

THE CITY OF
GREATER GEELONG

SUBMISSION TO REMAKING OF FINES REGULATIONS

—

DECEMBER 2025

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Executive Summary

The City of Greater Geelong welcomes the opportunity to respond to the Regulatory Impact Statement and draft regulations for fines in Victoria, recognising the Department's aim to enhance the system's efficiency, fairness, and sustainability.

As a rapidly growing and diverse community, Geelong faces significant challenges from rising living costs, housing pressures, and barriers to essential services, which especially impact vulnerable groups.

The City's submission addresses proposed changes affecting enforcement agencies, including local governments, government authorities, and Victoria Police, such as adjustments to fee structures and expanded data reporting, while highlighting the importance of targeted, inclusive policy responses to ensure all residents can cope and thrive in a shifting economic environment.

The City acknowledges the Department's ongoing efforts to improve the efficiency, fairness, and sustainability of the fines system. However, these changes come at a time when the Greater Geelong community faces significant cost of living pressures, making it essential to balance regulatory objectives with the need to avoid undue hardship for residents and enforcement agencies, including local governments.

The City supports **Option 2** - *Option 2 is based on the same cost data as Option 1, except the PRN fee has been lowered to 60 per cent of the corresponding cost, with the collection fee raised to achieve cost recovery on balance.*

However, to ensure an effective and equitable fines system, the City also recommends:

- Implementing a comprehensive public education campaign to promote timely fine payment and clarify enforcement fees.
- Quantifying and disclosing the financial and administrative impacts of the proposed changes on local governments, with consideration for transitional support.

This balanced approach aims to uphold regulatory objectives while minimising financial hardship on individuals and enforcement agencies and supporting community wellbeing.

Submission

The City of Greater Geelong (the City) welcomes the opportunity to respond to the Regulatory Impact Statement (RIS) and draft regulations for the remaking of fines regulations. We acknowledge the Department's commitment to improving the efficiency, fairness, and sustainability of the fines system in Victoria.

Greater Geelong is a rapidly growing and culturally diverse region, with residents from a wide range of backgrounds contributing to its social and economic vibrancy. However, this diversity also presents complex policy challenges, particularly in the context of rising living costs. Many households are facing increasing pressure due to escalating housing prices, utility costs, and limited access to affordable services. These financial strains are compounded by barriers to employment, education, and healthcare, which disproportionately affect vulnerable populations.

Addressing these issues requires targeted, inclusive policy responses that ensures all residents can thrive in a changing economic landscape.

The feedback provided is informed by three key documents which guide our work, they are the City's:

- *Social Equity Framework 2022–2025* which emphasises fairness as a core enabler, aiming to reduce disadvantage for residents and improve access to services.
- *Council Plan 2025–2029* which emphasises prudent financial management to ensure equitable outcomes for the community amid rising costs and economic pressures, with the goal of promoting fairness, access, and wellbeing for all residents.
- *Community Health and Wellbeing Strategy 2025–2029* which shapes financial decisions by prioritising equity and considering the social factors that affect health; this approach ensures that financial choices are not only responsible and sustainable, but also strategically aimed at reducing health disparities and enhancing long-term outcomes for the community.

This submission focuses on the proposed changes that will directly impact enforcement agencies, including local councils, government authorities, and Victoria Police. These changes include:

- Adjustments to the fee structure for registering unpaid fines with Fines Victoria.
- Expanded data reporting requirements for agencies.

We understand that feedback is being sought specifically on the RIS and draft regulations, and not on broader fines policy or individual infringement matters.

COST OF LIVING PRESSURES IN GREATER GEELONG

The greater Geelong region, one of Victoria's fastest-growing areas, is facing mounting challenges as the cost of living continues to rise. While the city has made strides in economic development and infrastructure investment, the reality for many residents is one of financial strain and uncertainty.

Current Cost of Living Snapshot

In Greater Geelong, the cost of living continues to rise, placing pressure on households across the region. A single person now requires ~\$2,058 per month to cover basic expenses, while a family of four needs ~\$4,226. Rent and utilities alone can exceed ~\$1,200 monthly, and grocery prices have steadily increased. Despite this, the median after-tax salary is only ~\$2,891, meaning many residents struggle to meet everyday costs.

Housing affordability remains a major concern, with median house prices nearing ~\$685,000 and rental options increasingly out of reach for low-income earners. These figures highlight the growing gap between income and living expenses, underscoring the need for targeted support and policy responses.

Only 0.9% of rental housing is affordable for very low-income households, despite a growing need for social and affordable housing. This shortage exacerbates housing stress and increases the risk of homelessness, particularly for vulnerable groups.

The City's current budget is shaped by a complex mix of financial constraints, community expectations, and regional growth pressures. While the 2025–26 budget includes some cost-of-living relief measures, such as free parking and reduced permit fees, it also reflects the city's struggle to maintain essential services under financial pressure.

Community Impact

The cumulative effect of these pressures is a community increasingly at risk of economic exclusion. Families are forced to make difficult choices between housing, bills, healthcare, and education. Young people and retirees alike are struggling to find affordable accommodation. The

region's growth, while promising, risks leaving behind those who are already vulnerable.

These mounting financial pressures also have a direct impact on an individual's capacity to pay fines and infringement notices. When basic living costs such as rent, utilities, and groceries consume the majority of household income, many residents find themselves unable to meet additional unexpected expenses like council fines or parking infringements. As a result, people may accrue further penalties or face legal consequences simply because they lack the disposable income to resolve these matters promptly.

This cycle compounds the stress and hardship faced by vulnerable groups, deepening economic exclusion and hindering community participation.

RESPONSE TO THE RIS OPTIONS

The RIS outlines three options for updating the fee structure:

1. **Option 1** - Retain the current fee structure, updating fee amounts in accordance with updated data on costs.
2. **Option 2** is based on the same cost data as Option 1, except the PRN fee has been lowered to 60 per cent of the corresponding cost, with the collection fee raised to achieve cost recovery on balance.
3. **Option 3** is the same as Option 2, except it provides for a 50 per cent discount on the PRN fee and collection fee for concession card holders.

Introducing a 50% discount for concession card holders, as outlined in **Option 3** while seen as beneficial for vulnerable groups, adds a significant layer of administrative complexity to the fines system. Local governments would be required to verify eligibility, process discounts, and manage appeals or disputes, all while maintaining accurate records and ensuring compliance with privacy requirements.

This additional workload is particularly challenging given that local governments are already operating under tight resource constraints, with no provision for extra staffing or funding to support the increased demands. The risk is that, without adequate support, the implementation of such measures could compromise the efficiency and effectiveness of enforcement processes, potentially delaying resolutions and increasing costs overall.

The City has calculated that **Option 2** alone, without additional discounting proposed under **Option 3**, will cost the city an additional \$83k due to the proposed increase in the Fines Vic lodgement fee of \$13.80. With an average 6,000 infringements lodged with Fines Vic every year at a total current cost of \$525k, these changes could have a substantial impact on the City's operations and workloads.

Importantly it should be noted that the increase in the PRN fee of \$21.20 per infringement would be retained by the City if the infringement were paid. The City sends ~19,000 PRNs annually for unpaid infringements reflecting a potential retention of revenue of \$400k pa which would be invested back into the community if paid.

Likewise, the increase in the Collection Notice Fee of \$35.60 per infringement would be retained by the City if the infringement were paid. The City sends ~10,000 collection notices annually for unpaid infringements reflecting a potential retention of revenue of \$350k pa which would be invested back into the community if paid.

Considering this, and the cost-of-living impacts highlighted above, the City has no option other than to support **Option 2**, the Department's preferred model.

While the City would advocate for **no cost** increases as a preferred status, we recognise that this is not an option, when so many infringement notices remain unpaid and that cost recovery is required when delivering a service. **Option 2** strikes a reasonable balance between cost recovery and community impact.

A higher PRN may prompt individuals to pay fines before receiving a formal reminder. Currently only 63% of infringements are paid before a PRN is issued.

RECOMMENDATIONS AND RATIONALE

In addition to our endorsement of **Option 2**, we respectfully submit two further recommendations, which we believe are essential for the successful implementation of the revised fines regulations.

1. Public Communication Strategy

A public communication strategy promoting prompt payment of fines benefits everyone, reducing financial stress and avoiding costly enforcement actions for residents.

It helps individuals avoid escalating fees and legal consequences, while enabling local and state government

to allocate resources more effectively. Clear, supportive messaging also builds public trust and encourages responsible civic behaviour.

Recommendation:

Implement a comprehensive public education campaign to promote timely fine payment and clarify the nature of enforcement fees.

Rationale:

The proposed changes will affect how individuals experience the fines system. Without clear communication, there is a risk of misunderstanding and increased non-compliance. An initiative-taking strategy will:

- Encourage timely payment, reducing enforcement costs.
- Minimise financial hardship, especially for vulnerable groups.
- Clarify that these are **state-imposed fees**, not council charges, protecting local government reputation.
- Support broader cost-of-living relief efforts by helping individuals avoid unnecessary penalties.

The intended outcome of implementing a comprehensive public education campaign is to ensure that the community clearly understands the changes to the fines system, particularly the nature and purpose of enforcement fees.

By proactively informing the public, the campaign aims to encourage people to pay fines on time, thereby lowering enforcement costs and reducing the risk of financial hardship, especially for vulnerable groups.

Additionally, it seeks to minimise confusion by clarifying that these are state-imposed fees rather than council charges, which helps protect the local government's reputation. This approach supports broader cost-of-living relief efforts by helping individuals avoid unnecessary penalties and promoting smoother, more efficient and transparent enforcement processes.

2. Transparency in Cost Impacts to Local Government

It is important to highlight that any increase to cost of fines could result in a rise in non-payment rates as increasing fees may make it more difficult for individuals, especially those experiencing financial stress, to pay their fines on time.

When enforcement-related charges go up, some people may be unable to afford the higher amounts, leading them to delay payment or default altogether.

This is particularly likely during periods of broader cost-of-living pressures, when household budgets are already stretched as the state (and country) is experiencing now.

As a result, fee increases can inadvertently discourage timely payments and contribute to a higher proportion of fines remaining unpaid, which then triggers further enforcement actions and additional recovery costs for local governments.

Recommendation:

Quantify and disclose the financial and administrative impacts of the proposed changes on local governments and consider transitional support.

Rationale:

Local governments will face increased costs and responsibilities, including:

- Higher fees for registering unpaid fines.
- Expanded data reporting requirements.
- Potential rise in non-payment rates due to fee adjustments.

Understanding these impacts is essential for:

- Effective budget planning and resource allocation.
- Advocating for transitional funding or administrative support.
- Ensuring local governments can continue to deliver services without shifting costs to ratepayers.

This transparency will also support collaborative implementation and policy refinement.

ADDITIONAL CONSIDERATIONS

Although outside the immediate scope of the RIS and this feedback, it is crucial to acknowledge that increasing fees in the current economic climate can have far-reaching effects on communities.

Higher enforcement-related fees may elevate the risk of non-payment, particularly among individuals already experiencing financial strain, potentially resulting in

increased enforcement actions and greater costs associated with debt recovery.

Individuals may be more likely to seek payment plans to manage the increased financial burden. Some individuals may also opt to wait for the debt to be lodged with Fines Victoria who can offer more lenient and extended payment arrangements increasing the level of fines unrecovered. Our experience is that the Infringement debt is unlikely to be recovered once lodged with Fines Vic.

Any additional demand placed on both Fines Victoria and City resources due to a possible increase in workload resulting from changes to fines regulations must be thoughtfully managed to maintain an appropriate balance.

Given the significant cost-of-living pressures many community members are facing, it is vital that any adjustments to fees are carefully considered to minimise further hardship. We recommend a balanced approach that takes these factors into account, ensuring that fee changes do not also disproportionately impact vulnerable groups and that any policy decisions are made with the broader community's wellbeing in mind.

CONCLUSION

The City of Greater Geelong supports the Department's preferred **Option 2**, provided that implementation is accompanied by:

- Clear public communication.
- Recognition of the financial implications for local government.

We appreciate the opportunity to contribute to this important consultation and look forward to ongoing collaboration to ensure the fines system remains fair, efficient, and responsive to community needs.

REFERENCES

[Remaking of fines regulations | Engage Victoria](#)

[Social Equity Framework 2022-25 | City of Greater Geelong](#)

[Council Plan 2025-29 | City of Greater Geelong](#)

[Community Health and Wellbeing Strategy 2025-29 | City of Greater Geelong](#)

[Budget 2025-26 to 2028-29 | City of Greater Geelong](#)

[Geelong Data Exchange](#)

[Selected Living Cost Indexes, Australia, June 2025 | ABS](#)

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