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NTCOSS Response to National Energy Performance Strategy Consultation Paper

The Northern Territory Council of Social Service (NTCOSS) welcomes the opportunity to respond to the Federal Government's National Energy Performance Strategy Consultation Paper

NTCOSS is a peak body for the social and community service sector in the Northern Territory (NT), and an advocate for social justice on behalf of the people and communities who may be affected by poverty and disadvantage. The community sector in the NT is made up of community managed, non-government, not for profit organisations that work in social and community service delivery, sector development and advocacy. The community sector plays a vital role in creating social wellbeing for all Territorians and in building safe and healthy communities by providing services that enable people to access and participate in health services, education, employment, economic development, and family and community life.

NTCOSS' vision is for a 'fair, inclusive and sustainable NT where all individuals and communities can participate in and benefit from all aspects of social, cultural and economic life'. NTCOSS' mission is to 'promote an awareness and understanding of social issues through the NT community and to strive towards the development of an equitable and just society'.

Developing and implementing a National Energy Performance Strategy (NEPS) would be beneficial for the NT, where energy hardship is experienced by a large number of households and is exacerbated by poor quality housing and extreme weather. Retrofits for low income households and repairs and maintenance programs that ensure on-going compliance, should be prioritised in the NEPS.

NTCOSS has contributed to the ACOSS submission, which provides a detailed response to questions in the consultation paper. NTCOSS's submission focuses on issues of concern to low income households in the NT, and the benefit that a national thermal performance strategy would have for these households. It is informed by the views of NTCOSS members, and discussions with stakeholders in Government, industry and the health sector.

NTCOSS endorses the submissions made by ACOSS and Healthy Housing For Renters.

Yours sincerely,

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CEO, NT Council of Social Service

Introduction

The NT, like other jurisdictions in Australia, has made commitments to improve the thermal performance of all dwellings in the NT, through [the Trajectory for Low Energy Buildings](#) and other agreements.

Disappointingly, the NT has consistently chosen to adopt lower standards than in most other jurisdictions. For example, the NT has not applied up to date national energy efficiency requirements to commercial buildings, and even now only intends to adopt the 2019 version of Section J of the National Construction Code (NCC). Further, as reported by [Health Habitat](#), the NT government has decided to adopt a variation to the recently revised NCC for residential dwellings, which will allow the NT to continue to build houses below the national standard.

Likewise, there appears to be little progress towards commitments made in relation to specific cohorts in the NT. For example, no substantial work has been undertaken by the NT Government to progress the commitment to ensuring all rental housing meets minimum energy efficiency requirements (p7 of the Addendum to the Trajectory).

A national strategy (the NEPS) with accountability measures would help drive substantial and timely progress towards these commitments and ensure that states and territories that have been slow to adopt contemporary energy efficiency standards are required to act.

As noted in the Consultation Paper, improving energy performance has substantial benefits. The benefits of improved energy performance are widespread and long lasting and can have a profound impact on people's lives. Improved energy efficiency and management will:

- Reduce energy bills and prevent energy hardship
- Contribute to energy security and affordability
- Improve health and wellbeing and reduce poverty and inequality
- Build climate resilience
- Slash carbon emissions and accelerate the transition to a low carbon economy (and ensure the NT and Australia meet their emissions reductions targets in 2030 and 2050)
- Provide economic stimulus to regional and local economies

Governments here in Australia and around the world have made commitments to improved thermal efficiency. A national strategy will assist governments in Australia to implement programs and take concerted action to improve the energy performance of the buildings and structures we all live and work in.

As a result of climate change, the NT is predicted to experience more extreme weather events. Improving energy performance of residential dwellings is essential to build climate resilience.

Establishing a NEPS that directs, supports and resources energy efficiency work across all states and territories will ensure the benefits of energy efficiency are nation-wide.

Governance

Energy governance needs to be inclusive, transparent and accountable. Good energy governance should promote demand side initiatives and be delivered through a range of mechanisms. Consumer advocates need to be supported and resourced to participate in energy system planning, governance and delivery.

Governance structures and processes must be genuinely inclusive and support/facilitate/enable development and delivery of community led, place based solutions

Equity should be embedded as a key value and objectives of the Strategy should include improved energy performance, reduced emissions, improved energy security. This would ensure the energy needs of low income and unwaged households, people living in social housing and other cohorts experiencing disadvantage are prioritised in all aspects of planning and implementing the NEPS.

As stated in ACOSS' submission, at present responsibility for energy efficiency is spread a range of ministers and portfolios with no one person or agency to drive, monitor and evaluate energy efficiency work.

Targets

Despite commitments to improved energy performance by all Australian governments, implementation of energy efficiency measures has been slow and inconsistent, and the NT has consistently failed to apply contemporary standards.

Targets should include timelines and milestones.

Energy efficiency targets, supported by practical programs would be useful in driving energy efficiency improvements. Targets would be useful to:

- Make clear what actions need to be taken by a certain date
- Encourage investment in energy efficiency

Residential

Improving the thermal performance of residential dwellings will have profound and positive impacts on people, the environment and the economy.

First Nations people in the NT – [76% of whom live in remote NT](#) communities – often live in poor quality housing, and households in these areas experience disproportionate levels of poverty and therefore are less able to cool/heat their homes, and live in healthy environments.

Without specific and targeted measures, it is likely that the most disadvantaged households will miss out on the benefits of improved thermal performance, further entrenching poverty and inequality in the NT and across Australia.

Residential dwellings built in Australia before 2006 were not required to meet any energy efficiency standards and even since the development of standards the NT has been slow to adopt higher standards. A national strategy that guides the development and implementation of a national plan to achieve zero energy residential buildings is needed to ensure that all Australians, including those who experience poverty, discrimination and disadvantage benefit from the move towards energy efficient homes regardless of which state or territory they live in.

The fact that the NT has chosen not to adopt the new NCC is an example of the NT falling further behind national and international standards. A national strategy will ensure all states and territories act on agreed commitments.

Renters

The NT has a much higher proportion of renting households than any other jurisdiction in Australia (42.4% of households in the NT compared to the national average of 29.5%). Renters across Australia face specific challenges – including that they do not have the authority to make changes to their place of residence – and feedback suggests that landlords are often reluctant to undertake upgrades from which they do not immediately benefit. Experience in other jurisdictions indicates that financial incentives for landlords have not been effective in getting landlords to improve the thermal performance of their properties. The best solution for renters is to require rented properties to meet minimum energy efficiency standards. A mandated approach will ensure all renters benefit from healthier homes, not just those with proactive landlords.

Public and Community Housing

Again, the NT has a significantly higher proportion of the population living in social housing (11.4% v the national average of 3.6% of households). It is essential that public and community housing tenants benefit from improved energy performance, given the impact this will have on their expenditure on energy.

NTCOSS Cost of Living Reports consistently show that low income households in the NT pay a larger proportion of total household income on energy than average income households. For example, in 2017/18, low income households spent 9.3% of household income on energy compared to average income households that spent 3.9% of household income. ([NTCOSS Cost of Living Report 28](#), July 2020)

Social housing tenants should be prioritised in implementation plans and the Commonwealth should provide additional funding to help state and territory public and community housing providers bring properties up to standard and ensure ongoing compliance to the standards.

Regional, Remote and First Nations

First Nations people living in regional and remote NT experience appallingly high levels of energy hardship, as evidenced by the frequency, duration and impact of involuntary ‘self disconnections’ from prepayment meters. According to [ANU research](#) on energy insecurity in the NT, ‘(p)oor quality housing, low incomes, poor health and energy insecurity associated with prepayment all exacerbate the risk of temperature-related harm’. There are multiple issues contributing to energy hardship in the NT, including socio-economic factors, poor quality housing, exacerbated by overcrowding and inadequate maintenance. According to the ANU research, ‘the prevailing temperature can affect the security of electricity supply due to the cost of heating or cooling’, and ‘temperature extremes are likely to act as a risk multiplier, worsening energy insecurity for those at greatest risk as ‘vulnerable households typically live in poorer quality housing, and have least resource or opportunity to invest in improvements to its efficiency and heating technology’. This is in the NT context, where the effects of climate change are already being felt: the average yearly number of extremely hot days (over 35°) is rising and is expected increase significantly during this century.

Improved thermal performance of First Nations housing would be a key element in reducing energy hardship and in building climate resilient communities.

A national strategy that is founded on good governance and includes targets specific to and designed by First Nations communities is one of a suite of measures required to reduce energy hardship for First Nations people. Solutions need to be community led and place based, planned and implemented in partnership with local communities.

Supply Chains and workforce

As well as significant health, financial and environmental benefits, improving the thermal performance of buildings in the NT is good for economic stimulus. There are opportunities to provide training, accreditation and business opportunities for people across the whole of the NT, and could provide important training and employment opportunities in First Nations communities in remote NT. Supply chain and workforce development should be consistent with the principles in APONT's [Fair Work and Strong Communities: A Proposal for a Remote Development and Employment Scheme](#).

References

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