

# Submission to the NSW Minimum Energy Efficiency Rental Standards Consultation 2026

Submitted by:

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## Who we are: The Climate Change, Place and Mental Health Incubator and The Matilda Centre

The *Climate Change, Place and Mental Health Incubator* is a multidisciplinary research project housed at the **Matilda Centre for Research in Mental Health and Substance Use**, University of Sydney. The four-year project (2024-2027) uses a mixed method approach combining deep qualitative inquiry with nationally representative quantitative research to advance and share knowledge around the relationships between the built environment and mental health in the context of climate change. Investigators come from disciplines spanning Psychology, Architecture, Design and Planning, Social Work, Public Health, Political Economy and Social Policy at the University of Sydney, Adelaide University, University of Otago, Open University UK, Two Things Consultancy, and City of Sydney.

The project has lived experience expertise at its core, with an advisory group consisting of six people with lived experience of mental ill-health, and exacerbation of mental health issues in the face of climate change due to housing conditions. The group was established to assist in the ongoing governance and implementation for the Incubator research program, as well as providing insights and contributions to inform our research methodology.

### Submission summary

We are pleased to see that the NSW Department of Climate Change, Energy, the Environment and Water and NSW Fair Trading are seeking feedback on the introduction of minimum energy efficiency rental standards, and we welcome the opportunity to provide input. Our submission seeks to highlight the importance of considering mental health in the design, implementation, and evaluation of MEERS.

The submission combines empirical evidence collated by the Investigator team with rich insights from the real-world experiences of the Lived Experience Advisory Group. Rather than being structured by consultation questions, the submission is organised by 1. The potential impacts of MEERS on mental health, 2. Other considerations for the design and implementation of MEERS, 3. Learnings from other jurisdictions, and a final note on measurement and evaluation.

## 1. The potential impacts of MEERS on mental health

The introduction of Minimum Energy Efficiency Rental Standards offers significant potential to improve tenant wellbeing, with mental health benefits warranting particular attention alongside the better-known physical health and energy outcomes. Studies using standardised instruments have recorded statistically significant improvements in Social Functioning, Role Emotional and Role Physical domains following insulation retrofits, alongside improvements in overall mental wellbeing and satisfaction with the home (Lozinsky et al., 2025). Poortinga et al. (2017) found improvements in mental health following upgrades to a national housing standard in Wales (Poortinga et al., 2017). However, there are also risks of negative impacts on mental health, which should be addressed where possible in design and implementation.

### 1.1 Potential positive impacts on mental health

The mental health case for MEERS is grounded in several reinforcing mechanisms identified in the international literature and independently highlighted by representatives from the Lived Experience Advisory Group.

#### **Reduced ‘bill stress’**

Housing affordability, including the ability to meet energy costs, is well established as a determinant of mental health (Lozinsky et al., 2025). Envelope retrofits reduce heating and cooling demand and, where the savings flow to tenants, ease the financial strain associated with energy poverty. Gilbertson et al. (2012) identified decreased financial stress as a key mechanism linking envelope retrofits to improved mental health outcomes in low-income households (Gilbertson et al., 2012).

*“I often avoid using heating and cooling systems because of fear around gas and electricity costs.”*

- 61YO, lived experience across private rental, public/community housing, and homelessness.

*“Energy bills are so small compared to how much money we’re paying to have a roof over our heads but helping with the cost of living anywhere is helpful.”*

- 47YO, >25yrs in private rentals, LGBTQIA+

#### **Reduced exposure to cold, damp and mouldy homes.**

Living in cold and damp housing has been linked in the literature to depression, anxiety and reduced mental wellbeing (Ortiz et al., 2020). Envelope retrofits have been shown to reduce tenant reports of dampness, condensation and mould (Lozinsky et al., 2025), removing a known psychosocial stressor and contributing to a greater sense of dignity, control and security in the home.

*“The main benefits would be improved health and safety for renters. It seems wild that there are hygiene standards for restaurants and other workplace standards that have to be met and are taken seriously by society, but in your home it doesn’t matter. This benefit would cover so many things in terms of better health outcomes, which is better for individuals but also for society.”*

- 47YO, >25yrs in private rentals, LGBTQIA+

*“Mould could be the link that affects both renters and landlords... As the damage it can cause and the capital costs involved with rectifying mould outbreaks provide a nominal reason for property investors to become involved in discussions.”*

- 35YO, has lived in private rental housing in NSW for 14 years

### ***Improved acoustic amenity and sleep***

Envelope upgrades reduce indoor noise levels by 5–7 dB and substantially lower dissatisfaction with external noise (Lozinsky et al., 2025). Chronic noise exposure is associated with stress, sleep disturbance and reduced wellbeing, particularly for rentals near transport corridors.

### ***Greater perceived control over the home environment***

The ability to maintain comfortable indoor conditions is itself associated with reduced psychological stress and improved wellbeing (Ortiz et al., 2020). Tenants in poorly performing rentals frequently report feeling a lack of agency over indoor conditions; MEERS would help redress this.

*“Being able to be comfortable in my own home would have an enormous impact on my mental health. I’d feel more comfortable inviting people over. I’d be more able to do the things I want to do in my house... there’s something about the quality of your home being poor and feeling like you’re powerless to do anything about it. It sends this constant message that you’re failing...”*

- 47YO, >25yrs in private rentals, LGBTQIA+

### ***Greater transparency to enable informed decision-making when selecting a rental property***

Related to control and agency, MEERS has the potential to lead to more transparency around housing features and issues during the rental inspection and application process. The rental market is characterised by ‘information asymmetry,’ which leads to power imbalances between landlords and tenants (St-Hilaire et al., 2024). Ameliorating this through clearer standards, and more transparent communication of how a rental property meets these standards, has the potential to reduce this information asymmetry and have flow-on mental health benefits through increased tenant empowerment (Brackertz et al., 2020). The current roll out of voluntary disclosure of home energy rating in NSW is a step in the right direction and has the potential to reduce information asymmetry if made mandatory.

There is a strong appetite for improved energy efficiency communication at point of lease, with the Federal Report on Home Energy Upgrades finding that 75% of Australians said it was important to see the Home Energy Rating at point of lease, and that Australians were more likely to inspect homes with high energy ratings (Bennetts Kneebone et al., 2024).

*“Once you’re living in the property, you don’t really have any recourse to ask for the house to be more liveable ... because renters have such little security... You have to take a “let’s stay quiet and hope we don’t get kicked out” approach... Some things you can check when you’re doing an inspection... But a lot of things you can’t check, so you really have very little information.”*

- 47YO, >25yrs in private rentals, LGBTQIA+

*“For tenants, having a MEERS score may help them in the decision to choose one property over another one scoring less on MEERS.”*

- Individual currently living in a retirement village, prior private rentals and community housing

*“Regulation determining the type of information presented on listings can both provide transparency and incentive for landlords. A standardised listing category for MEERS allows clear choice between those that are energy efficient and those that are not which [for landlords] creates demand.”*

- 35YO, has lived in private rental housing in NSW for 14 years

### **Increased equity and safety for vulnerable renters**

Evidence shows that low-income households are disproportionately exposed to energy inefficient housing, hot and cold housing, and energy hardship, which exacerbates income-based health and mental health inequities (Daniel et al., 2020). Further, Australians with chronic health conditions are more at risk of negative health impacts of hot or cold housing (Bentley et al., 2025). MEERS has the potential to reduce these inequities.

*“In my view, minimum energy efficiency standards are not just about comfort – they are a mental health, physical health, dignity, and equity issue. People on low incomes, including families and people experiencing mental health challenges, are disproportionately impacted by poor-quality housing and extreme weather. People should have the right to keep their home at a safe and comfortable temperature without ongoing stress, financial hardship, or harm to their health.”*

- 61YO, lived experience across private rental, public/community housing, and homelessness.

*“Easing discomfort and minimising health issues while providing cost saving benefits is important for all households, particularly in those which temperature disturbances may affect their health condition. Variants of mental health conditions ... are more sensitive to availability of heating and cooling solutions.”*

- 35YO, has lived in private rental housing in NSW for 14 years

### **1.2 Potential risks to mental health**

#### **Renovictions**

The risk of landlords evicting tenants in order to make energy efficiency upgrades, also known as ‘renovictions’ represents a potential negative impact of MEERS on mental health (Ross and McCartney, 2025). The threat of eviction or actual eviction is a known driver of poor mental health. Evidence from a large systematic review showed that individuals under threat of eviction experience negative mental health outcomes (depression, anxiety, psychological distress, and suicides) and physical health outcomes (poor self-reported health, high blood pressure) (Vásquez-Vera et al., 2017), as well as preventing renters from building a sense of ‘home’ or ‘belonging’ due to experiences of continual instability (Morris et al., 2025).

*“A really important part of rolling this out would be to make sure that it doesn’t cause people to be evicted... If there is any significant work that needs to be done, there should be a negotiation between the landlord and the tenant such as asking for the house to be empty for a couple of weeks to do the required works, or if it was something more major then tenants should be given the right to decide”*

- 47YO, >25yrs in private rentals, LGBTQIA+

### **Potential rent increases**

In a market model, one of the biggest risks of an initiative such as MEERS is rental increases, and the resulting increased financial stress for renters. As upgrades enhance rental appeal, measures are needed to limit subsequent rent increases and ensure tenant security. This is particularly relevant for low-income renters who are often fearful of negative repercussions when requesting maintenance or upgrades. (Daniel et al., 2020).

*“... giving [landlords] another reason to raise rents will put further pressure on renters. The idea [is] that these minimum standards will improve quality of life for many renters, but the cost of living crisis impacting both renters and landlords will make it impractical at the present time as the cost will be incurred by someone.”*

- 35YO, has lived in private rental housing in NSW for 14 years

*“Helping to get as many households as possible onto more renewable energy is excellent from both a cost and climate perspective... helping with the cost of living anywhere is helpful. It’s also important to cap rent increases. If rent was more affordable, then people could actually pay their electricity bills a bit more easily. Even though no grounds eviction has ended now, renters know that landlords can put the rent up as much as they want. If they want you out, they’ll just hit you with a huge rent increase.”*

- 47YO, >25yrs in private rentals, LGBTQIA+

### **Uneven distribution of benefits between landlords and tenants**

The mental health benefits of energy efficiency updates depend on tenants, not only landlords, capturing the financial savings. Where retrofit costs are passed through as rent increases that exceed bill savings, the financial-stress benefit is eroded. We recommend the regulatory framework consider this directly. Poor implementation has the potential to further drive existing inequities for renters, while also creating uncertainty around responsibilities for both renters and landlords (Nix et al., 2024).

*“We need to find benefits for both landlords and renters to achieve a win/win outcome, or landlords could just see MEERS as yet another piece of legislation for them to get around... Financial assistance would be the most important one for landlords, since any expenditure on the property comes out of their pockets.”*

- Individual currently living in a retirement village, prior private rentals and community housing

*“Efficiencies such as solar power and battery storage are capital intensive and only solve the problem for the renters who pay the energy bill. Not all renters pay for electricity but for those that do, ... [cost of living] would improve with the implementation of MEERS as energy efficiencies reduce ongoing bills over time. Capital costs which may be passed onto renters from new systems must be categorised differently ... to protect renters from unwarranted rent hikes. Unless proven that subsequent reductions in energy costs are factored into rent [increases]... Incentives for landlords such as discounts to council rates or free assessments by MEERS professionals in the first year could lessen the financial impacts as I see MEERS is a necessary framework for sustainable housing for the future.”*

- 35YO, has lived in private rental housing in NSW for 14 years

### **Summer overheating**

Overheating resulting from insulation retrofits implemented without compensating measures is the most significant risk identified in the international evidence and is particularly relevant in the Australian climate. This has been shown to increase the frequency of overheating events, with associated risks for heat-vulnerable tenants and adverse implications for mental health and sleep quality (Palinkas et al., 2022). We recommend that MEERS explicitly require summer-performance measures, such as external shading, ventilation pathways and cooling provision, alongside thermal envelope upgrades.

### **Worse indoor air quality**

Indoor air quality can deteriorate where airtightness is increased without corresponding ventilation provision, with build-up of CO<sub>2</sub>, VOCs, formaldehyde and radon (Lozinsky et al., 2025). Poor indoor air quality is itself associated with reduced wellbeing and cognitive function (Bhui et al., 2023, Riva et al., 2022). We recommend MEERS require ventilation provision appropriate to the level of airtightness achieved to reduce potential adverse health effects (Cartwright et al., 2025).

## 2. Other considerations for the design and implementation of MEERS

### 2.1 The importance of lived experience engagement during implementation

Meaningful inclusion of a diverse mix of renters and their perspectives should be built into the development, implementation, and evaluation of MEERS. We commend the NSW Rental Commissioner and this consultation for attending renters' forums and incorporating the *Listening to Renters' Voices* report in the consultation document. This promising start should be continued through meaningful community engagement throughout development, implementation, and evaluation of the standards. This is a crucial component to ensure the implementation and functioning of MEERS supports tenants' mental health and wellbeing through genuine engagement and co-production.

Evaluations of previous Low Income Energy Efficiency Programs (LIEEP) in Aboriginal households found that the programs could overcome cultural barriers by involving Aboriginal people in the teams tasked with preparing and delivering information, conducting home energy assessments and/or implementing energy efficiency improvements in homes (Daniel et al., 2020).

As such, it is important that lived experience co-production is used to rebalance existing power asymmetry within policy practices, so that renters are central to all policy, practice, and service design, while also having decision-making influence (Martin et al., 2024).

### 2.2 The importance of education during implementation

MEERS has the potential to lead to more transparency around housing features and issues during the rental inspection and application process with flow on benefits for mental health through increased renter agency and control over housing and reduced information asymmetry (Daniel et al., 2020). In order for these benefits to be realised, appropriate education, support, and compliance monitoring and enforcement mechanisms will be integral components to MEERS implementation (Nix et al., 2024). Lived experience advisors proposed that educational resources for renters around the upgrades are made available through traditional avenues, such as real estate agents, as well as through other popular platforms, such as Realestate.com and Domain, where renters go to find rental properties. These educational resources should include information around what renters should expect for energy upgrades (i.e., the different technologies/changes) and expected quality of housing. This should also include important information around expected changes, when they are expected to occur, and what tenants need to do to support the upgrades. All resources should be made available in different languages, simple language that all groups can understand, and in different formats (i.e., flyers, online webpages, videos, community forums, etc.).

*“There should absolutely be education around the upgrades for tenants as well as landlords. Both in terms of what tenants should be expecting and what the quality of the house should look like. You can't enforce something that you don't know you're entitled to, even though tenants are often reluctant to try and enforce our entitlements, but you have to at least know what they are... I think making sure that tenants have access to information around what you can expect and what to do if there are problems”*

- 47YO, >25yrs in private rentals, LGBTQIA+

*“...depending on the type of lease and arrangement with landlord renters may not have access to any information without going online. Not every renter goes through traditional avenues such as real estate agents which make it increasingly difficult to standardise access to information or raise awareness.”*

- 35YO, has lived in private rental housing in NSW for 14 years

### *2.3 Feedback on implementation models*

While a detailed review of the implementation models is outside the scope of this submission, project Investigators and lived experience advisors broadly agreed that a features approach, incorporating learnings from the ACT, VIC and NZ is preferable to ensure consistency in implementation. It was noted that the ACT and VIC rollouts indicate that they have not resulted in rent increases, which is of particular importance for reducing potential negative impacts on mental health.

## **3. Learning from other jurisdictions – housing upgrades, mental health, and wellbeing**

Across the evidence base, housing quality and energy efficiency initiatives are increasingly understood as mental health interventions as well as environmental or housing interventions. Case studies from other jurisdictions offer learnings that can inform MEERS design and implementation.

Poortinga et al. (2017) examined the social and health impacts of housing upgrades delivered through the Welsh Housing Quality Standard, finding that measures such as new windows and doors, boilers, kitchens, bathrooms, electrics, loft insulation and wall insulation were associated with improvements in housing satisfaction, thermal comfort, financial wellbeing, and mental and general health outcomes (Poortinga et al., 2017). Also in Wales, the 2026 evaluation of the ‘Optimised Retrofit Programme’ found that housing retrofit and energy efficiency measures improved tenants’ experiences of warmth, comfort, safety and affordability, while also contributing to positive mental health and wellbeing outcomes, including reduced stress and anxiety linked to lower heating costs, increased comfort, and improved home security, as well as enhanced feelings of pride, dignity and belonging. The evaluation used a mixed-methods approach, including tenant surveys, interviews and focus groups, alongside social cost-benefit analysis, to assess both perceived and measurable social, health and economic impacts of housing upgrades (Alma Economics, 2026).

Evaluation of the Aotearoa New Zealand Healthy Homes Initiative used a linked data approach to measure health and social impacts of the Initiative (which provides tailored support including insulation, heating, mould removal resources, housing repairs, advocacy with landlords, and referrals to social and health services). Over five years, participants experienced an 18.6% reduction in all-cause hospitalisations, fewer GP visits, reduced school absences for illness, lower reliance on government benefits, and increased wage income (Pierse et al., 2024). These factors are all linked directly or indirectly to mental health and wellbeing. NZ’s framework includes “not reasonably practicable” exemptions and partial exemptions (including for limited roof space), which are

necessary in some cases—but they also create a risk that a subset of the poorest-performing homes remain below a healthy thermal baseline if there is no strong alternative compliance pathway.

Another persistent challenge in NZ is that enforcement relies heavily on tenants raising issues, yet many renters avoid complaints when they fear tenancy termination or other adverse consequences (Chisholm et al., 2020). In NZ, this was being addressed by strengthening tenancy protections, but recent tenancy law changes have reintroduced 90-day “no-cause” terminations for periodic tenancies (alongside other termination rule changes), which can undermine renters’ willingness to press for minimum standards compliance. If NSW proceeds with MEERS, pairing standards with robust tenant protections and anti-retaliation mechanisms (and ensuring renters have safe pathways to report non-compliance) is critical.

NZ still lacks a universal home energy performance certification/disclosure system for dwellings at point-of-rent (or sale), which limits incentives for landlords to go beyond “bare minimum” compliance and makes it harder for renters to compare expected comfort and running costs. For NSW, MEERS could be strengthened by coupling minimum standards with transparent energy performance disclosure (or a pathway to it), so the market rewards better-than-minimum housing.

Back home in Australia, a randomised controlled trial of the Victorian Healthy Homes Program investigated the impact of thermal home upgrades on energy and health outcomes in vulnerable, older households. The trial showed that upgrades increased indoor winter temperatures, reduced exposure to cold conditions, lowered gas consumption and improved perceived thermal comfort. Importantly, the intervention group experienced significantly improved mental health, alongside reduced breathlessness and lower overall healthcare costs (Page et al., 2025).

#### 4. Opportunities for collaboration and synthesis with existing initiatives, to realise co-benefits for housing, climate change, and mental health

Several other important NSW plans, frameworks, and strategies have complementary objectives to the MEERS, offering the potential for a wraparound cross-agency approach to address housing, climate change, and mental health challenges for NSW residents. For example, the Housing and Mental Health Agreement (2022, NSW Health and DCJ) recognises the important link between safe, secure and appropriate housing and mental health, and positions safe housing as a mechanism for promoting recovery for those with mental illness. The Homes for NSW Strategy (2025-35, Homes NSW, DCJ) prioritises the development of more ‘decent homes’ that are affordable, healthy, accessible, well-designed, secure, safe and appropriate for the household, ensuring a ‘foundation for a good life’. The NSW Aboriginal Health Plan (2024-34, NSW Health) includes strategic priority areas of addressing the social and planetary determinants of health and climate change. Importantly, sitting across all portfolios is the NSW Performance and Wellbeing Framework (TPG26-02, NSW Treasury), which has relevant outcomes across the areas of ‘Healthy,’ ‘Housed’ and ‘Sustainable.’ The Performance and Wellbeing Framework offers mechanisms through which cross-agency performance indicators can be tracked, offering the potential to track the co-benefits of the MEERS across different wellbeing outcomes.

## Final note: Measurement and evaluation

It is crucial that implementation of MEERS has a measurement and evaluation framework that includes mental health. The learnings from other jurisdictions discussed above offer various evaluation approaches, with randomised controlled trials (as in the Victorian Healthy Homes Initiative) offering the highest quality evidence. Further, the NSW Treasury Performance and Wellbeing Framework offers mechanisms for mobilising cross-agency performance tracking, which could offer evaluation pathways in collaboration with NSW Health and Homes NSW.

Thank you for the opportunity to submit to this public consultation. We welcome opportunities to discuss our submission further.

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## Detailed responses: Lived experience consultation conducted with the Climate Change, Place and Mental Health Incubator Lived Experience Advisory Group

On the following pages we have provided the full responses to different consultation questions from the Incubator Lived Experience Advisory Group for consideration. Whilst we consulted with four Advisors, we have only included responses from Advisors who consented to share their feedback in its entirety.

### **Lived Experience Advisor 1 - Age 35, has lived in private rental housing in NSW for 14 years**

**Question 1** - *What are the biggest issues that renters and landlords face in New South Wales regarding energy efficiency of rental homes? Are there any important issues not listed here that should be included?*

The cost of living has impacted energy bills and for many is a primary concern in the current economic climate. This along with pressure from landlords who are also facing the same challenges, and who are willing to pass on costs to renters, make energy efficiency a difficult topic to approach.

Lower quality appliances amplify the problem by being less energy efficient yet affordable upfront but costing more in the longer term due to energy costs. Lack of knowledge and awareness around how much energy is saved in dollar terms is likely due to information not readily available to those when making purchases. If the information exists it could both raise awareness and create more informed decision making. Eg. The difference between a 5 star rating and a 2 star rating in monetary terms per month could make the steeper upfronts costs easier to bear.

Health issues affecting renters that opt out of using energy intensive appliances or do not have access to heating and cooling can be hard to qualify as the cause of illness and may not be directly linked to the immediate environment, but the immediate environment can exacerbate illnesses which may be under-reported.

Mould could be the link that affects both renters and landlords causing energy efficiencies to be addressed. As the damage it causes and the capital costs involved with rectifying mould outbreaks provide a nominal reason for property investors to become involved in discussions. The presence of mould is a health concern for renters and can be avoided with structural improvements that can be energy efficient.

Efficiencies such as solar power and battery storage are capital intensive and only solve the problem for the renters who pay the energy bill. Not all renters pay for electricity but for those that do this would eliminate most of the cost and not return any value for the landlord unless rents are raised which can be an argument in of itself as the rent could only be minimally increased where savings from energy bills can be drastically reduced, depending on the situation. Thereby moving money away from energy companies and towards landlords providing an incentive for upgrades.

**Question 2** - *What information do renters currently have access to about the energy efficiency of a rental home before signing a lease, and how could this be improved?*

None that I am aware of, depending on the type of lease and arrangement with landlord renters may not have access to any information without going online. Not every renter goes through traditional avenues such as real estate agents which make it increasingly difficult to standardise access to information or raise awareness.

Getting involved with advertising on rental boards such as the popular realestate.com/domain while also being present on gumtree.com, Facebook, flatmates.com and other informal sites may provide information to those that need it the most.

**Question 3** - *Are some groups of renters disproportionately affected by poor energy efficiency (for example, low-income households, older people, people with disabilities, families with young children, or renters in regional and remote areas)? Please explain.*

Groups that struggle to be regarded as stable sources of income for investors are the ones that will suffer the most as their ability to negotiate better energy efficiency practices is drastically reduced. This is because of the lack of options available to them if they were to say no. It can be said that this is common now for most renters as the saturated rental market puts most renters in this category and the barrier and stress in looking for alternatives remain high and give landlords the upper hand.

Socio-economic groups that suffer from health vulnerabilities will be greatly affected by poor energy efficiencies and will be compounded if they also fall under the low-income household category. Forgoing heating in winter is common among renters and insufficient cooling leading to reported cases of heat stroke within one's homes bring to light the severity of the issue. Health vulnerabilities extend to the elderly and particularly among renters who speak a language other than English at home making it difficult to convey any distress caused by inefficiencies.

Easing discomfort and minimising health issues while providing cost saving benefits is important for all households particularly in those which temperature disturbances may affect their health condition. Variants of mental health conditions such as Seasonal affective disorder and mood disorders such as bipolar are more sensitive to availability of heating and cooling solutions often causing milder episodes transposing into something more serious if prolonged and combined with other factors.

**Question 4** - *Would you like to share any experiences related to energy efficiency in rental homes with the team conducting this investigation?*

Refusal from landlord to fix air conditioner and restricting how much of the window can be opened, saying it was locked and they don't have the key. It was not very energy efficient.

**Question 9** - *What are likely to be the main benefits and impacts of introducing MEERS?*

Improving the thermal safety and comfort of rental homes  
Improving energy affordability and reduce energy hardship.

Maintaining and improving the quality of rental homes.

-From the consultation paper.

Other benefits mentioned are also important but the three above provide the most incentive for energy efficiencies to be introduced. Seeing the deficiency of rentals compared to owner occupiers it is important that both have access to the same level of wellbeing within their own homes.

Energy efficiencies are at the core of reducing our carbon footprint and tackling climate change. MEERS can introduce renewable energy to the home if it is economically and physically feasible for the dwelling in the form of solar. There are reports now of German apartments installing solar panels on their balconies, but it is yet to be seen as efficient or effective.

The thermal shells mentioned in the report from proper insulation is an incredible asset for a dwelling to reduce energy consumption and improve wellbeing.

From low vacancy rates in NSW and associated limitations in choice mentioned in the consultation paper, a rating by MEERS which is not met by the renter's current property may introduce greater hardship from merely knowing that they are living subpar and needing to seek for upgrades leading to mental distress. If the onus was placed on the landlord to introduce MEERS upgrades this could be mitigated.

**Question 10** - *Do you support the introduction of MEERS for rental homes in New South Wales? Why or why not?*

The current economic climate with rising interest rates and landlords already dictating market rents, giving them another reason to raise rents will put further pressure on renters. The idea that these would be minimum standards will improve quality of life for many renters but the cost of living crisis impacting both renters and landlords will make it impractical at the present time as the cost will be incurred by someone. I would support an initiative combining MEERS and existing standards, where there are already performance requirements in place such as the Building Code of Australia as well as those mentioned in the report, which in the future would streamline the process of implementing MEERS and enforce consistency.

**Question 15** - *If MEERS were introduced in New South Wales, how could potential impacts on rents be minimised to ensure renters are better off overall, including both rental and energy costs?*

Rent Freezes or ceilings for several years pegged to CPI with offsets to council rates/land tax as subsidies to encourage energy efficient upgrades. If upgrades are needed rent can be frozen for 1-2 years or pegged to CPI for a length of time.

Energy costs borne by the renter would improve with the implementation of MEERS as energy efficiencies reduce ongoing bills over time. Capital costs which may be passed onto renters from new systems must be categorised differently and made unable to combine with rent to protect renters from unwarranted rent hikes. Unless proven that subsequent reduction in energy costs are factored into rent at a reduced rate and the benefits of the new system offset the increase.

**Question 25** - *Are there any other alternatives or hybrid implementation models that would help achieve the objectives listed in the potential objectives for minimum energy efficiency rental standards in New South Wales?*

BASIX is already a mandatory standard since 1 July 2004, an implementation around option 1 "Features Checklist" to meet the minimum requirements set out in BASIX might be an option. Extending BASIX to include MEERS could be easier to implement and administer due to reduced

administrative burden. MEERS could then design the energy efficiencies and focus on potential feature improvements instead of certification as BASIX certificates already exists.

NatHERS implementation would be ideal but it is not a standard and does not set minimum requirements. Although using the same scale as NatHERS in MEERS would make sense and streamline the process of applying for one or the other upon development.

**Question 26** - *What types of support (financial, technical or regulatory) would most assist landlords, property managers and renters to improve the energy efficiency of their rental properties?*

Rental freezes could be implemented to protect existing renters while upgrades are installed to meet the minimum standards or pegged to CPI for a time so costs don't immediately get passed onto renters.

Incentives for landlords such as discounts to council rates or free assessments by MEERS professionals in the first year could lessen the financial impacts as I see MEERS as a necessary framework for sustainable housing for the future.

A features approach where the renter can apply for improvements with minimal involvement from landlord besides the final authorisation can lead to energy efficiencies installed more readily as benefits including energy cost savings directly impacts the renter. Subsidies can be introduced in low-income households to improve wellbeing and start discussions with the landlord.

As one of the most effective forms of temperature modulation in property and most expensive to install, insulation can be difficult to approve as a landlord. Regulation determining the type of information presented on listings can both provide transparency and incentive for landlords. A standardised listing category for MEERS allows clear choice between those that are energy efficient and those that are not which creates demand and attract a premium. Estimates made for energy bill savings can also be distributed at the listing level within the MEERS category.

Requirements for apartment buildings to have solar panels and adequate battery storage for occupants could be opt in for existing properties and mandatory for new buildings. Only allowing for subsidies to existing property.

There is a need for a standard to protect the wellbeing of renters as well as ensure that properties comply to a minimum level of habitability.

- having the standard as well as the features that would meet the standard be visible to those choosing to rent, that is on property listings;
- Temporary subsidies on property taxes based on upgrades needed to meet minimum standards for landlords;
- and temporary tax credits on purchases by tenants that would improve the standard of living;
- as well as the ability to combine these credits with landlords to upgrade fixtures to meet minimum standards.

**Lived Experience Advisor 2** - Individual currently living in a retirement village. Housing over a lifetime has included: paying off a mortgage, a private rental tenant, a community housing tenant, 10 years Director of a Community Housing scheme.

**Question 1** - *What are the biggest issues that renters and landlords face in New South Wales regarding energy efficiency of rental homes? Are there any important issues not listed here that should be included?*

The biggest issue faced is the reality that not everyone believes in climate at all. Some leaders and potential leaders speaking that way in the past week include Donald Trump and Angus Taylor, leader of the Opposition to our current government. So our ability to react to the changes we are already seeing will always be governed by politics.

My second point relates to how we can measure thermal efficiency in properties. I am unsure whether a scale for measurement already exists, but if not, we need to develop one. I am suggesting something like the K10, used in mental health assessments.

This leads onto difficulty of comparing one property with another, since private rentals are so variable in construction, and geographical location. It may be easier with public housing when there are often whole streets and bigger areas built in the same way.

**Question 2** - *What information do renters currently have access to about the energy efficiency of a rental home before signing a lease, and how could this be improved?*

I double checked this response with my adult son, who has been a lifelong renter, currently in Sydney. There has never been any information on offer.

We could improve on this as mentioned in Q1, and making it a legal requirement for landlords to give a figure, when they first lease out a property.

However, market forces come into play. There are not enough rentals available for prospective tenants, so demand is very high. Any property, however energy inefficient, is better than no property at all, so energy efficiency slips down the priority list.

**Question 3** - *Are some groups of renters disproportionately affected by poor energy efficiency (for example, low-income households, older people, people with disabilities, families with young children, or renters in regional and remote areas)? Please explain.*

The obvious answer to this is yes, of course. All of them.

The inherent difficulty in answering a question like this is that the categories are not mutually exclusive. So, belonging to one category does not mean you are also not included in another category.

For example, you could be an older person with disabilities, living in a rural or remote area. That takes in three categories.

**Question 4** - *Would you like to share any experiences related to energy efficiency in rental homes with the team conducting this investigation?*

When summers became hotter and more humid in Springwood, NSW, the owner of my rental installed a wall mounted air conditioner, at my request. Previously, I had existed with portable air conditioner I bought myself, but the increasing humidity made it impossible to run them for any length of time, without the need to empty the water collector every few hours. This meant pushing the whole unit to a bathroom floor drain to let out a large amount of water, followed by a mopping session to catch the overruns, and avoid wet, potentially slippery floors. The new air conditioner worked well on the ground floor, but upstairs was off limits, except in the very early hours of the morning, since it was unbearably hot. I had large windows and sliding doors receiving almost all-day sunshine.

I live with Multiple Sclerosis, a disease of the brain and spinal column. It causes some people to develop an inability to cope with high temperatures. Our brains stop functioning optimally, and this can lead to confusion and limbs failing to cooperate when we need to use them. It also affects the ability to balance. For me, going upstairs at times of high temperatures in Springwood was impossible.

I was under the impression that I was receiving a rebate on the costs of summer cooling, but my current energy supplier tells me this has been discontinued, as this is not considered sufficient reason to warrant a financial reduction. I have not followed this up any further, due to time pressures, and needing to care for sick husband. They actually did not tell me, I only found out when talking to them about another matter.

**Question 9** - *What are likely to be the main benefits and impacts of introducing MEERS?*

The main benefit of introducing MEERS would be to get the issue of climate change embedded into the documentation landlords need to consider when renting out a property.

This links back to answer one, and the difficulty of measuring accurately how energy efficient a home is, when it may not be built the same as other properties. If there are no standards, it is impossible to set requirements for energy efficiency. If we have MEERS, at least some sort of process has begun to hold landlords to account.

The Impacts of MEERS, include: landlords taking properties out of the market, because the work needed to retrofit a property is too costly. For tenants, having a MEERS score may help them in the decision to choose one property over another one scoring less on MEERS.

**Question 10** - *Do you support the introduction of MEERS for rental homes in New South Wales? Why or why not?*

I totally support the introduction of MEERS in NSW. This comes from my personal conviction that looking after our planet is the most important goal anyone should have. I am a 'Green' by political affiliation, so I don't know how I could answer otherwise.

**Question 15** - *If MEERS were introduced in New South Wales, how could potential impacts on rents be minimised to ensure renters are better off overall, including both rental and energy costs?*

This is an enormous question. We need to find benefits for both landlords and renters to achieve a win/win outcome, or landlords could just see MEERS as yet another piece of legislation for them to get around. We can only appeal to their better nature, although some more green leaning ones may not find it an issue.

In dollar terms, I can only think of a situation where tenants pay rent by direct debit (of course some probably do this anyway). The direct debit option could be offered, in exchange for a small \$ offset from the total rent looks like the only win/win I can see.

That would be difficult to apply to existing tenancies, but could be a future consideration. The total amount of rent payable would have in it an allowance for a beneficial MEERS rating to begin with.

**Question 16** - *Please indicate if you think there should be variations in how MEERS applies to certain home types, and if so, how and why.*

We were not asked to answer this one. I just want to acknowledge what a grey area retirement villages are. We paid a market price to 'buy' into this one. We are here on a 99-year lease, but we do not pay rent. We do however pay a 'general service' fee, like a strata fee, to cover the amenities we have access to, council rates and building insurance. When we leave the property for good, the owners take a cut of the increase in market value.

This is the first time I have seen a document which includes retirement villages, alongside other forms of rental. This still feels like a home we own, because we paid a market rate lump sum, in order to 'buy' it.

**Question 26** - *What types of support (financial, technical or regulatory) would most assist landlords, property managers and renters to improve the energy efficiency of their rental properties?*

Financial assistance would be the most important one for landlords, since any expenditure on the property comes out of their pockets.

It is probably true to say that making money is their prime objective, unlike Housing Associations, which have a mission to house people in need, no matter what their background and/or presenting problems.

**Lived experience Advisor 3 - Vibrant 61 years young, with lived experience across private rental, public/community housing, and homelessness. I spent around 15 years in private rental, approximately 10 years in public and community housing, and have lived in the social/community housing Independent Living Program (ILP) with my young adult son for the past 8 years. I have also been involved in cooperative and collective housing projects, giving me a strong understanding of housing insecurity, community living, and the realities of navigating housing systems over time.**

From my own experience living on a consistently low income in both private rentals and social housing, inadequate or non-existent heating and cooling has had severe impacts on both my mental and physical health, as well as financial wellbeing. There were periods where my child and I were extremely cold in winter and unbearably hot in summer, affecting sleep, increasing my anxiety and major depression, and contributing to frequent illness.

Because proper heating and cooling were unavailable or unaffordable to run, I often relied on unsafe or costly alternatives just to cope, including using a clothes dryer to heat the home in winter, and repeated cold showers in summer to cool down. At the same time, energy costs and financial stress became overwhelming, particularly when already surviving on a very limited income. Even now, I often avoid using heating and cooling systems because of fear around gas and electricity costs.

I later developed asthma, and my child was born with a respiratory condition. At one point we had to stay with my ageing parents because the housing conditions were not suitable, which created significant stress for everyone involved.

There is also an environmental and emotional impact to living this way. I felt guilty using a clothes dryer as a source of heating because of the energy consumption and what it communicated to my child about what people have to do just to stay warm and safe in their own home.

In my view, minimum energy efficiency standards are not just about comfort – they are a mental health, physical health, dignity, and equity issue. People on low incomes, including families and people experiencing mental health challenges, are disproportionately impacted by poor-quality housing and extreme weather. People should have the right to keep their home at a safe and comfortable temperature without ongoing stress, financial hardship, or harm to their health.

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