



Ageing on the Edge

NSW COALITION

Investigation into Minimum Energy Efficiency Rental Standards Consultation Paper

This submission is supported by the following NSW Ageing on the Edge Coalition members -



About NSW Ageing on the Edge Coalition

The NSW Ageing on the Edge coalition includes over 150 member organisations and supporters.¹ The members of the Coalition are advocates for change including people with lived experience, service providers, peak advocacy bodies and private sector organisations, working together to address housing and homelessness related issues of older people in NSW. The Coalition was originally convened as a reference group for the Ageing on the Edge project that launched a report in 2017, *The Older I Get the Scariest It Becomes – Older People at Risk of Homelessness in NSW*.²

We welcome the opportunity to provide input into the Minimum Energy Efficiency Rental Standards consultation process and endorse the submissions that directly respond to the consultation questions including the recommendations of Tenants Union NSW, Better Renting NSW, Shelter NSW and The St Vincent de Paul Society NSW. This submission highlights some of the key challenges specific to older people in NSW.

Context

An increasing number of older people in NSW are renting privately. There were approximately 240,000 older renters in 2021 compared to 137,500 in 2011 which equate to a 74.5% increase in a decade. Older people are disproportionately affected by extreme weather events such as heatwaves. Extreme weather-related injury deaths were predominantly among people aged 45 years and over with 77% of deaths accounting for those over 45 years and over half or 52% of deaths were people over 65 years.³

The prohibitive costs of electricity or gas results in older people not using heating in winter or risking their health in summer as they are unable to make their homes energy efficient. The vast majority of non-homeowners have little control over improvements that make the biggest difference to costs, such as insulation, solar or other energy efficient fixed appliances.

According to *Summer Survey Report*, older renters were more likely to feel unwell during heatwaves than the general older population (87% compared with 62%), were less likely to have air conditioners in their homes, and if they do, were more likely not to turn them on due to prohibitive costs.⁴ Data provided by Sweltering Cities from this report demonstrated the disproportionate impact of heat on older renters over 65 years.

¹ See further, Ageing on the Edge NSW Forum, accessible at: <https://www.olderrenters.org.au/national-action/ageing-the-edge-nsw-forum>

² J. Fiedler and D. Faulkner, *The older I get the scariest it becomes: Older people at risk of homelessness in New South Wales*, 2017, accessible at: <https://www.olderrenters.org.au/sites/default/files/older-i-get-scarier-it-becomes291117.pdf>

³ Australian Institute of Health and Welfare, *Let's talk about the weather: injuries related to extreme weather*, 2023, accessible at: <https://www.aihw.gov.au/reports/injury/extreme-weather-injuries/contents/about>

⁴ Sweltering Cities, *Summer Survey Report*, 2024, accessible at: <https://swelteringcities.org/2024/04/04/summer-survey-2024/>

Survey findings on older renters over 65 years

Indicator	All older people over 65 years	Older renters over 65 years
Do you ever feel unwell on hot days or during heat waves?	62.37%	86.76%
Do you think that cost of living pressures (the price of food, energy, housing and other things) will make it harder for you or your family during a heatwave this summer?	49.66%	72.46%
Do you have an air conditioner at home?	76.7%	65.22%
Do concerns about cost stop you turning it (air conditioning) on?	55.01%	77.78%
Do you think you have enough information to keep you and your family safe during heatwaves?	85.61%	70.59%

These demonstrate the stark differences older renters experience in keeping themselves safe during extreme weather events, especially in relation to feeling unwell during heatwaves and cost of living pressures resulting in people not using heating or cooling. A lower proportion of renters had air-conditioning at home and nearly 80% of older renters who had air-conditioning were concerned about cost of running them. These challenges are likely to be exacerbated for older renters relying on income support payments.

Case study

Sophia*, a 60 years old woman worked as a school administrator for 15 years before being made redundant at the age of 59. She had always rented, never having quite saved enough to buy a house. She had some savings and a small amount of superannuation. Over a period of 18 months, her landlord increased the rent three times, until she depleted all her savings and was paying 90% of her Jobseeker allowance on rent.

Sophia decided to move to regional NSW for cheaper rent, but as an older woman she couldn't find work, the car was expensive to run and the house was run down. To save money she avoided turning on the gas heating and couldn't afford the internet or credit on her mobile phone. She fell behind in rent and was served an eviction notice.

*Name has been changed and consent was obtained to share the story

Older women in the private rental sector: unaffordable, substandard and insecure housing report also highlighted how older women go to bed early evening to stay warm and reduce use of heating, some buying heavy curtains that they are able to take between houses and cladding the outside of properties with tarpaulins to reduce draughts.⁵ These demonstrate that thermal comfort becomes less of a priority as older people are forced to make extreme choices to ensure they do not fall behind on rent. Therefore, it is imperative that the implementation of these standards adequately cater for the needs of the most vulnerable people in NSW, particularly older renters.

Rooming houses provide an affordable housing option for many older people who are locked out of private rental market or from public and community housing. However, there are some rooming or boarding houses that are unregistered and therefore unregulated.⁶ Even in registered rooming houses, many older people experience significant challenges but are less likely to raise these issues due to fear of eviction.

There is a clear need to work directly with the residents of these settings to identify the types of modifications required and implementation processes, particularly those in unregistered boarding houses that are likely to lack basic insulation and ventilation, energy efficient equipment and are subject to restrictions around energy consumption.

The NSW Ageing on the Edge Coalition supports the implementation of minimum energy efficiency standards in rental properties and other forms of accommodation as a matter of urgency. Implementation should also consider the impact the disruptions will have on tenants and how to mitigate them.

Recommendations

In addition to the recommendations listed in Tenants Union NSW and Better Renting, Shelter NSW and The St Vincent de Paul Society NSW submissions, NSW Ageing on the Edge Coalition recommends –

- Implementing Energy Efficiency Rental Standards across NSW urgently, with a focus on prioritising households that are at higher risk of harm such as older people who are vulnerable to extreme weather events.
- Incorporate mechanisms to ensure private renters, people in rooming/boarding houses and others who are impacted by lack of energy efficiency in their homes are consulted throughout the process including implementation.

⁵ E. Power, *Older women in the private rental sector: unaffordable, substandard and insecure housing*. Western Sydney University, accessible at: <https://lmhn.net.au/wp-content/uploads/2020/10/Older-Women-in-the-Private-Rental-Sector.pdf>

⁶ See further: Your Community Health, *Submission to Commissioner for Residential Tenancies review into rooming house, 2022*, accessible at: https://www.yourch.org.au/wp-content/uploads/2022/04/Rooming-House-Lived-Experience-Project-YourCH-submission_FINAL3.pdf