

Request for information: Solutions to stimulate demand for home energy ratings

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About the Justice and Equity Centre

The Justice and Equity Centre stands for a society that is fair and free from discrimination and disadvantage. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we use the law and policy advocacy to challenge injustice and inequality. We do this through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

Energy and Water Justice

Our Energy and Water Justice work improves regulation and policy so all people can access the sustainable, dependable and affordable energy and water they need. We ensure consumer protections improve equity and limit disadvantage and support communities to play a meaningful role in decision-making. We help to accelerate a transition away from fossil fuels that also improves outcomes for people. We work collaboratively with community and consumer groups across the country, and our work receives input from a community-based reference group whose members include:

- Affiliated Residential Park Residents Association NSW;
- Anglicare;
- Combined Pensioners and Superannuants Association of NSW;
- Energy and Water Ombudsman NSW;
- Ethnic Communities Council NSW;
- Financial Counsellors Association of NSW;
- NSW Council of Social Service;
- Physical Disability Council of NSW;
- St Vincent de Paul Society of NSW;
- Salvation Army;
- Tenants Union NSW; and
- The Sydney Alliance.

Contact

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1. Introduction

The Justice and Equity Centre (JEC) welcomes the opportunity to respond to the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) request for information on solutions to stimulate demand for home energy ratings. We offer our insights as a member of the Home Energy Rating Disclosure Consumer and Industry Reference Group with an in-depth understanding of the needs of NSW's energy consumers.

The single most effective driver of the development of the market for home energy ratings is a commitment to mandate disclosure of home energy ratings at point of sale and lease. We note the clear consensus among the reference group regarding the necessity of mandatory disclosure of home energy ratings.

While we commend the NSW Government's work to date to progress this ambition, extended delays critically undermine certainty and significantly risk scope to achieve the outcomes intended to be enabled through disclosure. Further delays to announcing mandatory disclosure are the most critical risk to the development of the market for ratings services and the employment of disclosure to inform upgrades.

2. Key questions

1. What model or solution could DCCEEW implement to subsidise ratings and to build consumer demand and awareness of ratings?

The most effective way to build demand is to signal a committed – and ambitious - timeline for the implementation of mandatory disclosure of energy efficiency ratings, and ratings-based minimum energy efficiency rental standards. Without either of these measures to stimulate demand the market will perpetually be trapped in an immature phase of development and capacity. The considerations for implementing disclosure of ratings are discussed in depth in the Commonwealth Government's '[Home Energy Ratings Disclosure Framework](#)'.

Regardless of a commitment to mandate disclosure, the Government should consider programs to target households most likely to benefit from a rating – aligned with other Government programs. This includes energy rebate and EAPA assistance recipients, households living in homes with low energy performance, or other households otherwise experiencing disadvantage. We discuss models for such programs in our response to question 5.

Subsidies for ratings must be targeted and equitable. We note subsidies for Home Energy Ratings are already available to households eligible for the Home Energy Saver Program.¹ It may be more efficient to expand awareness of the Home Energy Saver Program, and expand eligibility where necessary, rather than offer a broader subsidy for ratings.

¹ NSW Climate and Energy Action, [Home Energy Saver](#), accessed 5 August 2026.

2. What model or solution could DCCEEW implement to support people to become accredited assessors and expand the accredited assessor workforce?

The expansion of the accredited assessor pool would best be enabled by a clear market signal and certainty, in conjunction with effective supports for training providers and the upskilling and accreditation of professionals with aligned skills.

The Victorian Scorecard program found that the most effective measure to increase the assessor pool was to provide assessors with long term certainty and the reasonable assurance that there will be forward business opportunities.² In NSW, this reasonable assurance would be provided by a concrete commitment, start date and program for implementation of mandatory disclosure, supported by programmes to enable assessments while disclosure is still voluntary (see response to question 5).

To ensure the right education pathways are available, the Government should partner with industry and training providers to investigate development pathways for assessors. In its Residential Energy Efficiency Workforce Mapping, the Energy Efficiency Council makes the following key recommendations to grow the workforce:

- attracting higher enrolments and completions from under-represented groups (First Nations people, women, and returning/transitioning workers);
- supporting training pathways to upskill existing workers and for new entrants;
- actively encouraging sector support and participation to accelerate workforce training and growth reforms resulting from new government policies and activities.³

This report also provides detailed analysis of the skills required by energy efficiency assessors,⁴ which may help the Government to identify existing professionals with applicable or aligned skillsets which can be augmented rapidly through upskilling and accreditation.

We support the Energy Efficiency Council's recommendations, and emphasise the need to work with communities, industry, and trade unions to ensure programmes to attract workforce are in line with community needs.

3. What role/s can industry play in supporting and delivering these models? What would be required by industry (if any) to undertake these roles?

We refer to the Energy Efficiency Council in relation to advice on how industry can support implementation of disclosure.

² The Residential Efficiency Scorecard, 2023, [Learnings from the Energy Savvy Upgrades program for vulnerable households](#), p 42.

³ Energy Efficiency Council, 2025, [Residential energy efficiency workforce mapping](#), p 40.

⁴ Energy Efficiency Council, 2025, [Residential energy efficiency workforce mapping](#), pp 113-118.

4. What risks and issues are important for government to consider? And how can they be mitigated?

The Government has already acknowledged the risks of balancing demand for home energy ratings, but should carefully weigh the materiality and impact of these against the much more significant and ongoing risks of inaction and further delay.

For example – should demand significantly outstrip the availability of services, this would present a temporary risk of consumer dissatisfaction through delayed service provision, service price escalation and potentially opportunistically poor service delivery. However, these are transitory risks which would rapidly dissipate as the market adjusts and matures in response. They can also be managed through a reasonable and targeted framework of amnesty and exceptions during the transition period.

In contrast the ongoing lack of signal to drive demand for ratings means a market guaranteed not to develop or mature, preventing NSW realising the well-evidenced benefits of disclosure⁵ and, more significantly, critically undermining the delivery of MEERs, the effectiveness of the Home Energy Saver Program and other important NSW Government initiatives implementing the Consumer Energy Strategy.

Importantly, the transitory risks arising from implementation itself are mitigated by an effectively planned and communicated timeline for phasing in disclosure requirements. This should involve concrete commitments with an announced date by which disclosure at point of sale and lease will be mandatory, with this date preceded by an appropriately staged 1-2 year transition.⁶ A longer phase-in period would be inefficient as it would undermine the force of the incentive provided by the committed date, and would likely require additional (inefficient) ‘early mover’ incentives to stimulate demand in earlier years.

5. Where are the opportunities for innovation and partnerships?

The Government should consider partnerships with the health or community sectors to drive demand and enable more equitable outcomes from energy efficiency upgrades.⁷

In doing so, it can draw from examples from other jurisdictions, where households experiencing disadvantage receive home energy assessments and supports to enact recommendations from the assessment. For example:

- The New Zealand **Healthy Homes Initiative** (funded by government) partnered with health, community and Indigenous organisations to provide home energy/safety assessments, referral to rebate programs and access to upgrades, to eligible low income households. Evaluations of the programme identified between 507-630% return on investment, largely due

⁵ Common Capital, 2024, [An assessment of the costs and benefits of energy performance disclosure in single dwellings and apartment buildings](#)

⁶ Australian Government, 2024, [Home Energy Ratings Disclosure Framework](#), p 38.

⁷ Australian Council of Social Services, 2024, [Funding and financing energy performance and climate resilient retrofits for low-income housing](#)

to avoided healthcare costs.⁸

- The Victorian Government ran the **Energy Savvy Upgrades program** in partnership with councils and community groups, to deliver Residential Efficiency Scorecard assessments to households experiencing energy poverty. After the assessment, residents were offered subsidised energy efficiency upgrades. The program achieved substantial home comfort improvements, energy bill reductions, and estimated greenhouse gas emission reductions.⁹
- In England, the '**Warm Homes: Local Grant**' is offered to select low-income households. The grant is administered by councils, who are tasked to arrange a home energy survey and pay for select efficiency improvements.¹⁰

We highlight that these programs supported households to make energy efficiency upgrades after the assessment. This is important, as households may not have the financial or mental resources to act on the findings of their rating. The recently announced Home Energy Saver Program grants stream, in conjunction with Energy Saving Scheme and other aligned programs could support this.

The JEC's 'Powerless' research on energy debt and disconnection highlights that many households experiencing payment difficulty cannot simply reduce their energy use, and would benefit long term from energy efficiency assessments that are paired with meaningful assistance to improve their living situation.¹¹

The NSW Government should explore similar opportunities with local government and local community organisations, including Aboriginal Community Controlled Organisations and Local Aboriginal Land Councils.

3. Further engagement

We would welcome the opportunity to discuss any matters relating to home energy ratings further with the Department. Please contact Kira van Os (Policy Officer – kvanos@jec.org.au) regarding any follow up.

⁸ Health New Zealand Te Whatu Ora, 2024, [Healthy Homes Initiative: Five year outcomes evaluation](#); Habitat for Humanity Northern Region, 2023, [Healthy Homes Program Evaluation](#)

⁹ The Residential Efficiency Scorecard, 2023, [Learnings from the Energy Savvy Upgrades program for vulnerable householders](#), p 22.

¹⁰ UK Government, [Apply for the Warm Homes: Local Grant to improve a home](#), accessed 30 July 2026.

¹¹ Public Interest Advocacy Centre, 2024, [Powerless: Overview report](#), p 102.