

## 2025 consultation

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# NSW Net Zero Commission

Submission to the 2025 consultation process

July 2025



We acknowledge the Traditional Custodians of all the lands on which Jesuit Social Services operates and pay respect to their Elders past and present. We express our gratitude for their love and care of people, community, land and all life.

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# 1. Jesuit Social Services: Who we are and what we do

Jesuit Social Services has been working for more than 45 years delivering support services and advocating for improved policies, legislation and resources to achieve strong, cohesive and vibrant communities where every individual can play their role and flourish.

We are a social change organisation working with some of the most marginalised individuals and communities, often experiencing multiple and complex challenges. Jesuit Social Services works where the need is greatest and where we have the capacity, experience and skills to make the most difference.

Our services span Victoria, New South Wales and the Northern Territory where we support more than 57,000 individuals and families annually.

Our service delivery and advocacy focuses on the following key areas:

- **Justice and crime prevention** – people involved with the justice system
- **Mental health and wellbeing** – people with multiple and complex needs including mental illness, trauma, homelessness and complex bereavement
- **Settlement and community building** – recently arrived immigrants and refugees, and disadvantaged communities
- **Education, training and employment** – people with barriers to sustainable employment
- **Gender justice** – providing leadership on the reduction of violence and other harmful behaviours prevalent among boys and men, and building new approaches to improve their wellbeing and keep families and communities safe.
- **Ecological justice** – inviting discussion on what practices, policies and actions can be taken by governments, individuals, organisations and the community services sector within Australia, to build an ecologically just society.

## The Centre for Just Places

In 2021, Jesuit Social Services established the Centre for Just Places to support and enable place-based approaches. The Centre for Just Places engages in research, advocacy and place-based work across Victoria, New South Wales, and the Northern Territory. A key focus of the Centre's work includes enabling climate justice, aiming to bring attention to the root causes of intersecting social and environmental inequities, and the actions required to shift them – including the critical work of community service organisations. Our work aims to build resilience for people and organisations most vulnerable to the localised impacts of climate change, through place-based, collaborative, and community-led responses.

## Dropping Off the Edge

For more than 25 years, Jesuit Social Services has collaborated with researchers to examine complex disadvantage in communities around the country. Over that time, we have released a series of reports now generally known as Dropping off the Edge (DOTE). [DOTE21](#) is the fifth instalment in the series and for the first time includes a set of environmental indicators for disadvantage, including heat vulnerability, air quality (particulate matter) and green canopy.

DOTE21 shows clearly that complex and entrenched disadvantage is experienced by a small but persistent number of locations in each state and territory across Australia. As a society we cannot, and should not, turn away from the challenge of persistent and entrenched locational disadvantage, no matter how difficult it may be to solve the problem.

For the full report, key findings and interactive maps, please visit our dedicated DOTE website at [www.dote.org.au](http://www.dote.org.au).

## **Working in place – Western Sydney**

Since 2008, Jesuit Social Services has been building on the strengths of Western Sydney communities to support them to break out of the cycle of disadvantage. We use a place-based, community development approach to support community members to develop local solutions to local problems. We currently support the community in two key ways:

### ***Community building***

- *Willmot Community Hub* – a thriving community centre which offers a range of programs including Early Childhood Nurse Clinic, Paediatric Clinic, Afterschool programs, school holiday programs, parent support groups and a range of social recreational and cultural groups and activities.
- *Parenting support* – we deliver therapeutic groups for Aboriginal women experiencing vulnerability during pregnancy and in their children's early years. This program is delivered in close partnership with Baabayn Aboriginal Corporation.
- *Pathways to Participation* – Jesuit Social Services employs local people and engages a team of local volunteers to provide pathways to enhanced community participation, skill building and employment.
- *Schools and community engagement* – we support high school students to become more aware and active in social justice through volunteering, helping students and staff from across Sydney to deepen their understanding of the experiences and struggles that many community members in Western Sydney grapple with every day.

### ***Social enterprises centred around food security and ecological justice***

- *Ignite Food Store* – this initiative enhances food security by rescuing food waste and bringing low-cost food to the Mount Druitt community. We also sell good quality used toys, clothes, books and household goods through the Ignite Op Shop.
- *Currawong Kitchen* – a social enterprise with a focus on training and employing local people, that supplies healthy and affordable food to the canteens at Willmot Public School, Lethbridge Park Public School and catering to the general community.
- *The Open Pantry* – which has supplemented Jesuit Social Services' food security projects in Western Sydney since 2022 by offering rescued and donated food at a low cost to the local community in Blackett.

Jesuit Social Services is also a member of the 'Together in 2770' collective, a group of organisations working across the 2770 postcode in Mt Druitt to create structural and systemic change, with a deep focus on community-led advocacy. The collective's current advocacy priorities are public transport, housing and infrastructure.

## 2. Key recommendations

### 1. Adopt a justice-centred approach

- Embed equity and justice at the heart of all mitigation and adaptation strategies.
- Recognise that climate vulnerability is shaped by structural disadvantage, not just environmental exposure.
- Prioritise support for communities “first and worst” affected by climate change, such as those in Western Sydney.

### 2. Build an inclusive engagement and empowerment model

- Move beyond information campaigns to participatory, co-led engagement strategies.
- Actively involve communities with limited digital access, language barriers, or reduced civic participation due to systemic disadvantage.
- Centre First Nations voices in climate planning and decision-making.

### 3. Support place-based, community-led adaptation

- Invest in local partnerships and community-led responses, building on existing local initiatives such as the Western Sydney Regional Organisation of Councils (WSROC) Heat Resilience Program.
- Engage with local knowledge and lived experience to co-design effective solutions.
- Scale up initiatives that build social capital and community resilience, which are critical in climate disaster responses.

### 4. Ensure equitable approaches to electrification and energy efficiency upgrades

- Mandate minimum energy efficiency standards for rental and public housing, similar to reforms in Victoria and the ACT, and fund upgrades to public housing stock.
- Provide targeted financial support to low-income households to retrofit homes and adopt energy-efficient appliances.
- Co-design subsidy and incentive schemes to be accessible for those experiencing financial stress.

### 5. Incorporate equity measures in monitoring frameworks

- Track localised impacts of climate change with detailed, place-based metrics (e.g., heat stress, air quality, social isolation) and reallocate resources to where they are needed most.
- Include equity-focused indicators that assess how well adaptation efforts reduce underlying drivers of climate vulnerability.
- Examine how adaptation initiatives build social cohesion and support place-based, local responses.

## **6. Take a comprehensive, community-centred approach to mitigating extreme heat**

- Support local heat mitigation efforts, such as those led by WSROC and Sweltering Cities.
- Address drivers of extreme heat, including urban planning issues and lack of green spaces, as well as drivers of extreme heat vulnerability, such as poor quality housing stock.
- Ensure mitigation efforts recognise the importance of social infrastructure and networks.

### 3. Submission

Jesuit Social Services welcomes the opportunity to make a submission to the Net Zero Commission's 2025 consultation process, as the Commission is shaping its work plan and developing the climate change and adaptation advice you will give to the NSW Government.

Climate change demands urgent, ambitious, and sustained action to protect communities in NSW and build long-term resilience. As a community service organisation working directly with vulnerable communities, Jesuit Social Services sees firsthand how climate change disrupts lives, exacerbates existing hardships and deepens cycles of disadvantage.

Climate risks are not borne equally, with the most severe impacts falling on those already experiencing structural and systemic inequalities such as insecure housing, digital exclusion, racism, poverty and economic disadvantage. Climate impacts like extreme heat, cold, and power outages are disproportionately felt by individuals and communities systematically denied the resources and power to adapt. These inequalities also constrain the capacity of many to participate in activities and decision-making that supports equitable climate mitigation and adaptation.

Jesuit Social Services has conducted national research into complex and entrenched disadvantage for more than 25 years. Our most recent Dropping Off the Edge (DOTE) report measured disadvantage on 37 unique indicators, including environmental indicators which examine heat stress, poor air quality, green canopy and access to nature reserves. The findings show that communities that experience persistent disadvantage often also experience disproportionate environmental injustices. Place-based climate adaptation is essential, as climate change impacts are shaped by local geography, social and environmental inequities, and entrenched disadvantage.

The Commission's work and independent advice to the NSW Government should support deep and sustained emissions reductions, alongside transformative place-based adaptation with a focus on equity and justice. This approach should ensure that those most impacted are at the centre of decision-making and implementation, with the necessary systemic and structural supports needed to drive these efforts. Additionally, the community sector's role in fostering resilience must be acknowledged and adequately resourced.

We welcome the Commission's focus on social equity in the transition to an electrified built environment and consideration of initiatives related to extreme heat, which disproportionately impacts communities already experiencing marginalisation and disadvantage. However, we are concerned that the consultation paper fails to acknowledge unequal capacities to adapt to climate change and support the shift to net zero. There is a notable lack of recognition of the unequal distribution of resources, power, and capacity among different communities to adapt to and respond to climate change.

In our submission we highlight the need and opportunity for the NSW Government to adopt a justice-centred approach within all climate mitigation and adaptation efforts. Our submission is grounded in:

- our place-based, community-led work in Western Sydney, based in Willmot and Emerton;



- our national research into locational disadvantage which forms the basis of the *Dropping of the Edge* report; and
- our ongoing advocacy for climate justice, including transformative climate action targeting the structures and systems that perpetuate disadvantage.

An equitable and just adaptation strategy is critical for the state's future. By centring place-based, community-led responses, addressing the structural drivers of climate vulnerability, and ensuring that adaptation is fairly resourced and equitably implemented, the Commission can work towards supporting a more resilient and just society. We welcome the Commission's work in this space and look forward to continuing to engage as work progresses.

## Response to consultation paper questions

**Question 1: What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work?**

Through our place-based work in Emerton and Willmot (Mt Druitt) in Western Sydney, Jesuit Social Services is working alongside communities who are already experiencing the compounding impacts of climate change. These experiences reflect how climate risks intersect with existing social and economic disadvantage, highlighting the urgent need for justice-centred responses that are shaped by those most affected.

Mt Druitt has some of the highest levels of disadvantage in NSW. The suburbs of Willmot and Emerton have been in the top 40 most disadvantaged locations (based on SA2) in NSW in the 2007, 2015 and 2021 editions of the DOTE report<sup>1</sup>. The Australian Bureau of Statistics 'Socio-Economic Indexes for Australia' (SEIFA) 2021 similarly ranked Emerton and Willmot in the lowest decile of relative socio-economic disadvantage<sup>2</sup>.

The Mt Druitt area is also home to the largest urban Aboriginal population in NSW. Systemic underinvestment in this community has led to persistent health inequities such as higher rates of chronic illness that are now being worsened by rising temperatures and heat stress, leading to hospitalisations.

In the summer, many people and families suffer from extreme heat in their homes, and in winter can also experience extreme cold. During extreme heat days, residents report regularly experiencing suburb-wide power outages of multiple hours, as a result of demand on the electricity grid from neighbouring suburbs. Even when power supply presents no challenges, people are often faced with the decision of not using air conditioning or heating due to concerns over their ability to pay rising electricity bills.

The urban design of suburbs in Western Sydney contributes to the extreme temperatures, with few green spaces, limited shade and tree canopies, and black roofs in new developments. Limited and unreliable public transport means people are incentivised to travel by car. For those community members who do rely on public transport, there are

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<sup>1</sup> Dropping Off the Edge 2021, [www.dote.org.au/new-south-wales](http://www.dote.org.au/new-south-wales)

<sup>2</sup> SEIFA, [www.abs.gov.au/statistics/people/people-and-communities/socio-economic-indexes-areas-seifa-australia/2021](http://www.abs.gov.au/statistics/people/people-and-communities/socio-economic-indexes-areas-seifa-australia/2021)

very few bus shelters, leaving people no option but to wait for unknown periods of time in the direct sun.

The area has a high rate of private rentals and public housing. According to the 2021 Blacktown City Council community profile, in Willmot approximately 35% of people own or are purchasing their own home (compared to 61% for NSW); 29% were in social housing (compared to 4% for NSW); and 23% in private rentals (compared to 27% for NSW)<sup>3</sup>. We hear from community that the quality of housing is very poor, commonly lacking insulation and poorly maintained. Community members express frustration at public messaging around individual action on climate change – e.g. being told to switch over to energy efficient appliances or light bulbs – when they may be dealing with leaking roofs or windows that don't close properly due to poorly maintained rental homes.

Residents in private rentals or public housing have little ability or incentive to upgrade their homes to make them more energy efficient. Among those who do own their home, there are high rates of mortgage stress. Where government incentives to upgrade homes to improve energy efficiency are available, these are still not viable for many families who are struggling to pay their bills.

In light of the disproportionate impacts of climate change on climate vulnerable communities, equity and justice must be at the heart of the state's mitigation and adaptation approach. Government investment and decision-making needs to address the unequal resources that individuals and communities have to support adaptation, and recognise the importance of place-based, community-led responses to ensure a just and equitable transition to net zero.

## **Question 2: What actions can the commission take to engage across the community to help drive the shifts needed for the net zero transition and for effective climate change mitigation and adaptation?**

Government-led efforts to adapt to and mitigate the effects of climate change must acknowledge the unequal capacity of individuals and communities to 'step up and act' to address climate change (as stated in the consultation paper). Structural inequalities in NSW like insecure housing, digital exclusion, language barriers, and economic disadvantage constrain the capacity of many to participate in activities that support climate mitigation and adaptation. Engagement must be designed to address these barriers to enable inclusive participation, and individual, household and community level action beyond this.

We must go beyond 'educating and informing' to supporting genuine empowerment and co-leadership with community in all engagements. Framing the public as passive recipients of knowledge overlooks the lived experience and expertise of communities and reinforces top-down, technocratic approaches. The shift to net zero must embed participatory, community-led processes to support equitable outcomes and impact. We encourage explicit commitments to equity, First Nations leadership, and support for communities that are most impacted but with the least capacity to mitigate the impacts of climate change.

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<sup>3</sup> Blacktown City Council community profile, <https://profile.id.com.au/blacktown/>

There is a need to support and invest in place-based partnerships with community service organisations who are embedded in local contexts. These organisations are best positioned to co-create relevant, equitable climate solutions with individuals and communities experiencing marginalisation and disadvantage.

As an example, in Victoria, Jesuit Social Services led the *Mobilising climate just and resilient communities in Melbourne's west* initiative, bringing together 44 health and community service organisations, as well as policymakers and sector networks, to identify needs, opportunities, and a strategic direction for action and advocacy in the region<sup>4</sup>. The year-long project resulted in a Collaborative Action Plan which reflects and builds on the diverse contributions of individuals and organisations already working at the interface of climate change, health and social justice in Melbourne's west. It also seeks to further understand the localised and systemic drivers of climate vulnerabilities for community health and service organisations in the area.

### **Question 19: What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings?**

Consideration could be given to building, construction and planning standards for new builds and new developments, to address features of the urban landscape that are known to contribute to energy inefficiency (e.g. availability of green spaces, roofing colours and materials, orientation of buildings).

In addition, energy efficiency standards for private rentals and community housing would assist in incentivising upgrades to existing buildings and accelerate electrification. Introducing minimum standards for community housing would also require investment by the NSW Government to upgrade existing public housing stock.

Jurisdictions including Victoria and the ACT have now legislated minimum energy efficiency standards for rental homes. In Victoria, a 2-star heating standard was introduced in 2023 and new standards will be phased in from 1 March 2027 including:

- heating and hot water systems that reach end of life must be replaced with efficient electric systems,
- insulation must be installed in ceiling spaces by an accredited installer, and external doors, windows and wall vents must have draught proofing installed, and
- efficient electric cooling must be installed in the main living area of all rental homes.

The Victorian Government's decision to introduce these standards was underpinned by long-standing evidence that voluntary programs and incentives don't encourage investment in energy efficiency upgrades in rental homes – because the costs are incurred by the homeowners while the bill saving and health benefits largely go to the tenant<sup>5</sup>.

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<sup>4</sup> [cjp.org.au/research-publications/collaborative-action-plan-for-climate-justice-in-melbournes-west/](https://cjp.org.au/research-publications/collaborative-action-plan-for-climate-justice-in-melbournes-west/)

<sup>5</sup> [www.energy.vic.gov.au/households/electric-and-efficiency-standards-for-buildings/energy-efficiency-for-rental-properties-in-victoria](https://www.energy.vic.gov.au/households/electric-and-efficiency-standards-for-buildings/energy-efficiency-for-rental-properties-in-victoria)

## Question 20: How could social equity be better addressed in the transition to an electrified built environment?

Social equity should be considered in the allocation of resources to support and incentivise electrification. Equitable investment must recognise the intersection of socioeconomic disadvantage and climate change vulnerability. Western Sydney is a prime example of an area with high levels of socioeconomic disadvantage where the effects of climate change – in particular extreme heat – are already being felt. These communities will be affected ‘first and worst’, and mitigation/adaptation efforts must recognise and respond to this, for example through equity-based allocation of government resources to support mitigation and adaptation, as well as electrification incentives.

In the context of government incentives to upgrade and retrofit existing buildings, governments must recognise that current subsidy schemes are out of reach for families experiencing financial stress, and unappealing for investors who are not currently required to provide rental homes which meet minimum energy efficiency standards. (Re)designing incentive schemes through a co-design process with community, including looking at non-financial barriers to accessing these schemes, could address equity considerations and support higher levels of uptake among people who are disproportionately vulnerable to climate impacts.

Introduction of policies such as minimum energy efficiency standards for private rentals and public housing (as discussed in the response to question 19), and higher levels of subsidies or incentives for low-income households would support a more equitable transition to an electrified built environment. Consideration of distribution channels for subsidy or incentive programs is also required, tapping into local organisations and initiatives focused on community building, disaster resilience and climate adaptation (see further detail in the response to question 27).

## Question 22: What should be included in a monitoring framework for NSW in the context of the transition to net zero, including specific metrics and indicators?

To support a just transition and a social equity approach, a monitoring framework for NSW should include the following:

- Climate impact indicators capturing the impacts of climate change on communities with different levels of climate vulnerability
  - This could include development of localised maps incorporating income, housing quality, health status, and social isolation indicators, and would support the prioritisation of communities at greater risk in adaptation/mitigation efforts
  - Examples of environmental indicators included in DOTE21 are heat stress, poor air quality, green canopy and access to nature reserves
- Equity indicators which monitor the drivers of climate vulnerability
  - This would support analysis of how adaptation efforts are reducing structural inequalities that contribute to climate vulnerability – e.g. housing precarity, underemployment, financial stress

- Process indicators that capture how well adaptation actions build social capital, strengthen local governance, and redistribute resources toward people and places that need it most
  - This would provide insights around how resources to support adaptation are being distributed, including support for place-based, community-led approaches

**Question 23: The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you?**

A resilient NSW is fair, inclusive, and transformative in how it prepares for and responds to climate impacts, which will in turn ensure the state is stronger in the face of climate disruption.

Resilience means being proactive in adopting approaches that simultaneously reduce climate risk and social injustice, recognising the intersection between the two. Climate change adaptation efforts often prioritise physical infrastructure and emergency responses, overlooking the social, economic and environmental conditions that make certain communities more vulnerable. It is not enough to ensure that there are public spaces where people can go to remain cool, or public health campaigns on dealing with extreme heat – a resilient NSW requires addressing existing inequalities that affect adaptive capacity.

Vulnerability is not an inherent trait—it is shaped by intersecting structural injustices, including colonisation, poverty, housing insecurity, health disparities, and social exclusion. Without targeted interventions to address structural and systemic inequalities, these communities will remain at heightened risk.

Resilience also means strong communities and social infrastructure. Political scientist Professor Daniel Aldrich emphasises the importance of strong social relationships in building community resilience in the face of climate disasters, drawing on research from across Japan, the United States and Australia<sup>6</sup>. Social capital networks provide people with access to diverse resources such as financial aid, information, and psychological support in disaster situations, and their value cannot be overlooked in efforts to build a more resilient NSW.

**Question 27: What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW?**

We encourage the Commission to consider the value of place-based, community-led heat adaptation responses, and to ensure state-level approaches take into account and build on what is happening at the local level.

Jesuit Social Service's community building work in Western Sydney plays an important role in strengthening social infrastructure. This enables the community to respond in the face of

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<sup>6</sup> [www.sydney.edu.au/sydney-environment-institute/news/2023/05/02/climate-change-and-social-capital--professor-daniel-aldrich-visi.html](http://www.sydney.edu.au/sydney-environment-institute/news/2023/05/02/climate-change-and-social-capital--professor-daniel-aldrich-visi.html)

disaster events such as extreme heat, consistent with Professor Aldrich's work on the value of social capital networks, and lays important foundations for climate mitigation and adaptation work.

A number of other organisations and initiatives are also operating at the local level across Western Sydney to address the specific issue of extreme heat. We encourage the Commission to engage with these organisations in the context of its adaptation and mitigation work around extreme heat.

For example, in 2018 the Western Sydney Regional Organisation of Councils (WSROC) established its Heat Resilience Program, which has made significant contributions to the understanding and management of heat risk in Western Sydney, and Australia more broadly. The project's governance includes the Heat Smart City Plan (2025–2030); Greater Sydney Heat Taskforce; and Turn Down The Heat Strategy<sup>7</sup>.

Sweltering Cities is a national advocacy organisation working specifically on issues related to extreme heat. The organisation was founded in 2020, inspired by the extreme heat and over development in Western Sydney, and the lack of representation of impacted communities in climate change coverage. Sweltering Cities is focused on the health and wellbeing of communities by advocating for better, climate-safe cities, and have released a number of reports including: Hot Roofs Report; Climate change and building standards; and Busted Bus Stops which reveals the infrastructure inequality resulting in Western Sydney communities baking at hot bus stops every summer.

We also reiterate the importance of the Commission assessing the drivers of heat vulnerability as part of its work, in particular energy efficiency of public housing stock and rental homes, urban planning and building regulations, and cost of living pressures.

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<sup>7</sup> <https://wsroc.com.au/projects/project-turn-down-the-heat>