

Submission to the Productivity Commission Interim report: Investing in cheaper, cleaner energy and the net zero transformation

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Introduction

UNICEF Australia welcomes the opportunity to contribute to the Productivity Commission's inquiry into *Investing in Cheaper, Cleaner Energy and the Net Zero Transformation* and respond to the draft recommendations outlined in its interim report. We commend the Commission's forward-looking approach and its recognition of the long-term risks climate change poses to Australia's wellbeing and productivity.

As the leading global advocate for children's rights, UNICEF Australia is committed to ensuring that Australia's energy transition is equitable and inclusive of the needs, voices and contributions of children and young people. A successful path to net zero must do more than protect children and young people from climate risks – it must create opportunities for them to participate in shaping and benefiting from a cleaner, more resilient Australia.

While the Commission's interim report provides valuable insights, it does not yet explicitly consider children and young people or their rights within its analysis and draft recommendations. Given children and young people are disproportionately affected by climate-related risks and will live the longest with the consequences of today's decisions, there is a need to explore how the proposed clean energy reforms and housing resilience strategies might affect their current and future lives.

UNICEF Australia encourages the Productivity Commission to incorporate a child and youth lens into its final recommendations to ensure that the clean energy transition, climate resilience efforts and the broader net zero transformation reflect children and young people's rights and safeguards their wellbeing and future opportunities.

This submission begins by outlining why children and young people should be a central consideration in the Productivity Commission's interim report. It then provides detailed recommendations in response to Section 3 – *Addressing Barriers to Private Investment in Adaptation* – followed by broader recommendations relating to Sections 1 and 2 of the report.

Summary of recommendations

1. Integrate child-focused indicators into the proposed national climate risk information database to ensure children's vulnerabilities and needs are systematically assessed and addressed.
2. Mandate child-sensitive standards, benchmarks outcomes and monitoring within the proposed nationally consistent climate resilience rating system for housing, based on a holistic and multi-sectoral understanding of resilience.
3. Embed children's rights in equitable housing resilience policies and activities by:
 - a) Prioritising children and young people from Aboriginal and Torres Strait Islander communities, rural and remote families, low-income households, renters, and social housing tenants.
 - b) Ensuring housing resilience strategies include affordability safeguards, risk-informed planning, child-sensitive relocation protocols, inclusive consultation, and equity-focused monitoring to protect children and families in vulnerable situations.
4. Ensure national climate adaptation policymaking is transparent, rights-based and accountable to children and young people by:
 - a) Requiring the Climate Change Authority to embed child-sensitive indicators to its adaptation monitoring, evaluation, and learning frameworks and tracking resilience of essential child-focused services such as schools and health facilities.
 - b) Directing the Climate Change Authority to establish formal mechanisms for youth participation in adaptation governance and accountability.
 - c) Ensuring the Climate Change Authority's monitoring, evaluation, and learning frameworks promote cross-sectoral learning to reflect children's lived experiences across health, education, housing, and social systems.
5. Embed a child- and youth-focused lens into its recommendations on clean energy and net zero strategies by:
 - a) Prioritising equity in its proposed energy and decarbonisation strategies, ensuring benefits reach children and young people from Aboriginal and Torres Strait Islander communities and those in rural and remote areas and low-income households.

- b) Recommending the phase-out of indoor gas and retrofitting low-income homes with energy-efficient electric alternatives to protect children’s health and deliver significant economic and productivity benefits.
- c) Recognising and enhancing children and young people’s contribution to net zero transition by recommending greater investments in green skills and creating opportunities for co-design and decision-making.

Climate-related risks to children and young people: An overlooked threat to Australia’s future productivity

Children and young people are affected by climate-related risks in distinct ways from adults. This difference is due to their unique physiological sensitivity, developmental stage, limited access to resources and coping skills, reliance on carers and related vulnerabilities.ⁱ They face heightened risks from air pollution,² heat stress,ⁱⁱ and disasters,ⁱⁱⁱ which are compounded for Aboriginal and Torres Strait Islander children, those in remote or low-income communities, and children and young people with a disability.^{iv} What happens in a child’s early years shapes their lifelong health, wellbeing and opportunities. Despite being the least responsible for the causes of climate change, children and young people will live with the consequences for longer than any generation before. They will face its worsening impacts as they transition into adulthood.

An estimated 932,886 children and young people in Australia – or one in six – are impacted by disasters in an average year. Even more are impacted by other climate-related risks, including heat stress, pollution and food and water insecurity.^v Our new report with Deloitte Access Economics estimates the annual cost of disasters alone on children and young people at \$6.3 billion.^{vi} This is mostly driven by future income losses due to education disruptions (\$5.3 billion) and the cost of disaster-related mental health treatment (\$662 million). It also includes other impacts such as child abuse, displacement, employment disruptions and physical injuries.^{vii}

These disruptions risk undermining Australia’s productivity and resilience by limiting young people’s earning potential and workforce participation. The findings show that these costs will only increase as emissions rise and disasters become more frequent and severe, and that mitigation could reduce costs by up to \$3.8 billion annually by 2060.

This evidence makes a compelling business case for child-sensitive climate mitigation, adaptation and resilience strategies. Reducing emissions, accelerating the transition to net zero, and strengthening children’s resilience to climate risk is not only the right thing to do – it’s also a smart investment in Australia’s future productivity.

Detailed recommendations

Addressing barriers to private investment in adaptation

Draft recommendation 3.1 Set up a climate risk information database covering all climate hazards

UNICEF Australia supports the Productivity Commission’s recognition that Australia faces significant climate-related risks, regardless of future emissions reductions. To this end, we welcome the Productivity Commission’s proposal to establish a central, publicly accessible climate risk information database covering all hazards and regions. This resource will be critical for policymakers, planners, insurers, developers, builders and the public to make risk-informed decisions and investments. To ensure equitable and effective adaptation, the database must embed a child-sensitivity and future generations lens across its design and outputs.

A generic database risks obscuring children’s unique vulnerabilities. Users need visibility into how hazards intersect with children’s exposure (where they live and learn), sensitivity (age, disability, health status), and adaptive capacity (access to services, income support, safe housing). Without these insights, planners cannot identify child vulnerability hotspots, prioritise climate-resilient schools and early learning centres, or assess whether investments are reaching those most at risk.

UNICEF’s Children’s Climate Risk Index – Disaster Risk Model (CCRI-DRM) provides a ready pathway to integrate this lens. The CCRI-DRM is a global, child-centred tool that maps children’s exposure to hazards and vulnerability based on access to essential services.^{viii} Localising this model for Australia would deliver a granular, place-based picture of risk,

highlighting disproportionate impacts on Aboriginal and Torres Strait Islander children, those in remote and rural areas and low-income households. It would also strengthen accountability by aligning with national frameworks such as the National Agreement on Closing the Gap, ensuring child-relevant risks and outcomes are tracked over time.

Practically, the database should include child-specific indicators, present outputs that highlight areas of highest combined risk for children and make this information accessible for governments and stakeholders to guide planning and investment. A more accurate picture of the climate risks children face will help direct investments more effectively – reducing harm to children and young people today, and avoiding greater social and economic costs in the future.

Recommendation 1

Integrate child-focused indicators into the proposed national climate risk information database to ensure children's vulnerabilities and needs are systematically assessed and addressed.

Draft recommendation 3.2 Develop a nationally consistent climate resilience rating system for housing

UNICEF Australia welcomes the Productivity Commission's recommendation to develop a nationally consistent climate resilience star rating system for housing. We recognise the potential of such a system to empower families to make informed decisions about where they live, while also incentivising developers, sellers and homeowners to invest in early and effective resilience upgrades.

To ensure the system delivers equitable outcomes, we recommend that it be child sensitive. Children experience climate risks differently and more acutely than adults and their unique vulnerabilities, rights and wellbeing must be safeguarded within the system's design, standards and evaluation metrics.

Climate-related risks – such as extreme heat, flooding, bushfires and storms – can directly compromise housing quality and stability. These events may lead to deteriorating living conditions, including poor thermal regulation, mould and structural damage. Repeated exposure to disasters can also result in displacement and housing insecurity, as well as disruptions to schooling, healthcare and social networks.

Children are particularly vulnerable to these risks. Children are physiologically more sensitive to temperature extremes and poor thermal regulation in housing can exacerbate health risks and limit opportunities for learning and play.^{ix} There is a growing body of evidence demonstrating that housing conditions and stability affects children's health, development and longer-term wellbeing.^x Stable housing has been recognised as a protective factor for child wellbeing.

However, housing resilience extends beyond the four walls of an individual dwelling. It encompasses the surrounding environment, community infrastructure and access to essential services – all of which influence children's ability to thrive in the face of growing climate-risks. Access to safe outdoor spaces, nature and peer interaction is essential for children's physical and mental development. Children also require access to safe evacuation routes and private and trauma-informed spaces in emergency shelters to maintain dignity, safety and routine during disasters.

To achieve this, we recommend embedding the following considerations into the climate resilience star rating system for housing to ensure it is responsive to the needs of children and the specific climate risks they face:

- **Protection against climate hazards:** Minimum standards and metrics should be established to protect children and young people from extreme heat, floods, bushfires and other climate risks. These should include:
 - Indoor air quality and ventilation tailored to children's respiratory health.
 - Thermal comfort thresholds appropriate for infants and children.
 - Access to green spaces and safe outdoor play areas with climate-resilient surfaces and shade.
 - Emergency preparedness features, including child-friendly evacuation signage and routes, and access to emergency shelters and transitional housing that are child-safe and trauma-informed. These spaces should provide privacy and support children's recovery and psychosocial wellbeing.

- **A holistic, multi-sectoral approach to resilience:** The system should extend beyond individual dwellings to include community infrastructure and services that children and young people use and rely on. Climate resilience benchmarks should be developed for child-focused spaces such as schools, early learning centres and playgrounds, as well as surrounding transport infrastructure.
- **Monitoring and adaptation:** The system should be regularly reviewed to track progress on child wellbeing and adapt to evolving climate risks.

Though the Productivity Commission proposes an outcomes-based rating system focused on potential damage costs, we recommend a more prescriptive lens to clarify to homeowners, builders, insurers and policymakers what child-sensitive resilience means and how it is measured. This approach could still encourage innovation by specifying required child-focused outcomes – such as thermal comfort or ventilation – while allowing flexibility in how builders and developers achieve them and tailor them to respond to place-based risk.

By embedding these elements, the climate resilience star rating system could do more than reduce property damage – it could protect children’s health and rights, while creating safe, more inclusive homes and communities.

Recommendation 2

Mandate child-sensitive standards, benchmarks outcomes and monitoring within the proposed nationally consistent climate resilience rating system for housing, based on a holistic and multi-sectoral understanding of resilience.

Draft recommendation 3.3 Governments should agree on a series of actions to improve housing resilience over time

UNICEF Australia strongly supports the Productivity Commission’s call for coordinated, long-term action to enhance the resilience of Australia’s housing stock against climate change impacts. To be effective and sustainable, resilience policies must be equitable and grounded in child rights – with specific focus on families from Aboriginal and Torres Strait Islander communities, remote and rural areas, low-income households, renters, and social housing tenants.

Families experiencing social and financial disadvantage are disproportionately exposed to climate-related hazards and less able to afford adaptation measures.^{xi} Older and lower-quality homes, often occupied by families facing disadvantage, are especially vulnerable, placing children at heightened risk of heat stress, respiratory illness, displacement, and disrupted education.

Research indicates that heat events cause more deaths in Victoria than any other climate-related disaster and that social housing tenants – including First Nations people and people with disabilities and the children within these groups – are especially at risk.^{xii} Social housing is not built to withstand the increasing frequency and intensity of heatwaves and many homes lack basic cooling infrastructure.^{xiii} Without targeted action, resilience policies could widen inequality – benefiting children from families who can afford housing resilience upgrades while leaving others behind.

The Australian Council of Social Service (ACOSS) has proposed a 7-year national program and \$2 billion federal investments to retrofit public, community and First Nations housing for energy efficiency and climate resilience, highlighting the benefits including poverty reduction, improved health, and lower disaster costs through safer, more sustainable housing.^{xiv}

Alongside the child-sensitive, holistic, and multi-sectoral approach we recommended above, UNICEF Australia further recommends:

- **Equitable prioritisation:** Resilience strategies should prioritise the needs of children and young people from Aboriginal and Torres Strait Islander communities, remote and rural regions, and low-income families, renters and social housing tenants.
- **Safeguards for affordability:** Subsidies and financial assistance should be available to support families facing disadvantage to pay for resilience upgrades and avoid financial stress or housing insecurity.
- **Risk-informed urban planning:** Climate and disaster risk assessments should prevent new housing and infrastructure in hazard-prone areas and direct investments to lower-risk areas.

- **Child-sensitive planned relocation:** In regions where high hazard-risk makes areas unsafe and lead to untenable recovery and rebuilding costs, governments should consider planned relocation as a last-resort adaptation strategy. Any relocation process should be voluntary, rights-based and child-sensitive, ensuring continuity of children's education, healthcare, cultural connections, and social networks to protect against the trauma of displacement, and ensuring children's voices are heard and their needs prioritised.
- **Inclusive consultation:** Direct engagement with families, children and young people should be prioritised to ensure resilience measures reflect their lived experience and the specific needs of rural, remote and Aboriginal and Torres Strait Islander communities.
- **Equity metrics and monitoring:** Resilience progress should be tracked through measures that capture not only technical outcomes but also whether families and children in vulnerable situations are receiving timely and effective support.

Promising initiatives are already underway to strengthen housing resilience for communities most at risk. The NSW Government's \$100 million Resilient Lands Program aims to unlock safer land for housing in the Northern Rivers, complementing the \$880 million Resilient Homes Program.^{xv} Similarly, Brisbane Flood Resilient Homes Program improves safety for low-income households through targeted retrofits.^{xvi} Explicitly integrating child rights and child-specific vulnerability considerations into these existing resilience programs and new programs would significantly enhance their impact.

Tools such as UNICEF's CCRI-DRM and Child-Centred Urban Resilience Framework developed for inclusive city planning could guide the development of child-sensitive resilience actions.^{xvii}

The Australian Housing and Urban Research Institute (AHURI) 2025 research program includes inquiries into vulnerability mapping, risk costing and establishing a framework for building resilience into the Australia housing stock by 2050.^{xviii} It is also developing a data framework to better understand children's housing circumstances and wellbeing impacts.^{xix} Such research could provide a valuable evidence base for future investments.^{xx}

Recommendation 3

Embed children's rights in equitable housing resilience policies and activities by:

- Prioritising children and young people from Aboriginal and Torres Strait Islander communities, rural and remote families, low-income households, renters, and social housing tenants.*
- Ensuring housing resilience strategies include affordability safeguards, risk-informed planning, child-sensitive relocation protocols, inclusive consultation, and equity-focused monitoring to protect children and families in vulnerable situations.*

Draft recommendation 3.4 Give the Climate Change Authority responsibility for monitoring, evaluation and learning regarding adaptation policy

UNICEF Australia supports the Productivity Commission's recommendation to give the Climate Change Authority (CCA) responsibility for monitoring, evaluation and learning (MEL) on adaptation policy. Strong accountability is essential to ensure adaptation efforts are fair, effective, and responsive to children and young people, who will be most affected by the actions we take today.

Children and young people are not only among the most affected by climate change, they are also powerful agents of change. Across Australia and the world, young people are leading climate movements, contributing innovative solutions, and holding governments to account. Their unique perspectives and lived experiences are vital for shaping effective climate adaptation policy and accountability mechanisms. To this end, adaptation MEL must position children and young people as key stakeholders and partners.

The UN Convention on the Rights of the Child and General Comment No. 26 on children's rights and the environment provide a clear framework for integrating child rights into climate adaptation policy. To ensure the Climate Change

Authority can deliver an adaptation MEL framework that is rights-based and inclusive of children and young people's leadership, we recommend the following actions:

- **Apply rights-based principles:** The CCA should adopt the best interests of the child as a guiding principle in adaptation MEL and assess whether adaptation policies uphold children's rights to safety, protection, health, education, and meaningful participation.
- **Embed child-sensitive indicators into MEL frameworks:** The CCA should embed child-focused metrics in MEL frameworks and track the resilience of essential services like schools, early learning centres, and health facilities. It must also assess whether adaptation programs are accessible and equitable for children in rural, remote, and Aboriginal and Torres Strait Islander communities.
- **Establish youth participation mechanisms:** The CCA should establish formal mechanisms for meaningful child and youth engagement, such as youth representatives, advisory panels, and consultation forums, and ensure biennial reports reflect youth contributions and perspectives on adaptation progress. It should also publish accessible, youth-friendly summaries of adaptation outcomes to promote accountability and engagement.
- **Strengthen cross-sectoral learning:** The CCA should coordinate MEL efforts across sectors to build a holistic picture of adaptation outcomes for children and youth and facilitate learning and knowledge exchange between federal, state, and territory governments to embed inclusive, child- and youth-sensitive approaches.

Recommendation 4

Ensure national climate adaptation governance is transparent, rights-based, and accountable to children and young people by:

- a) Requiring the Climate Change Authority to embed child-sensitive indicators to its adaptation monitoring, evaluation, and learning (MEL) frameworks and tracking resilience of essential child-focused services such as schools and health facilities.*
- b) Directing the Climate Change Authority to establish formal mechanisms for youth participation in adaptation governance and accountability.*
- c) Ensuring the Climate Change Authority's MEL frameworks promote cross-sectoral learning to reflect children's lived experiences across health, education, housing, and social systems.*

Reducing the cost of meeting emissions targets and speeding up approvals for new energy infrastructure

UNICEF Australia commends the Productivity Commission for the considered recommendations in sections 1 and 2 of the interim report on *Reducing the Cost of Meeting Emissions Targets and Speeding Up Approvals for New Energy Infrastructure*.

We encourage the Productivity Commission to strengthen its recommendations by explicitly embed a child- and youth-lens in its proposals on clean energy and the broader net zero transformation. This includes ensuring its recommendations do not deepen inequalities and instead promote equitable access to clean energy benefits for children and young people in Aboriginal and Torres Strait Islander children and young people in rural and remote areas, and children from low-income households.

The Productivity Commission's report misses critical opportunities to integrate child-sensitive approaches in its analysis and recommendations on clean energy and decarbonisation strategies. For example, the interim report offered limited engagement with the health impacts of indoor gas use or detailed strategies for accelerated indoor gas phase-out. Continued indoor use of gas, especially gas stoves and unflued gas heaters, emit harmful pollutants such as nitrogen dioxide and fine particulate matter, which have been linked to up to 12 percent of Australia's childhood asthma burden.^{xxi}

Children in low-income and rental households are disproportionately exposed to these risks due to older, poorly maintained appliances and limited control over their living conditions. Beyond respiratory impacts, gas use contributes to indoor air pollution and long-term exposure can impair childhood development and wellbeing.

In addition to the immediate health benefits for children, phasing out indoor gas and retrofitting low-income homes with energy-efficient, electric alternatives could unlock significant productivity gains. Deloitte's analysis for ACOSS

demonstrated that retrofitting low-income homes with energy upgrades is projected to generate \$17 billion in economic benefits by improving housing affordability, reducing energy bills, and supporting local jobs.^{xxii} This dual opportunity to protect children's health while boosting productivity strengthens the case for a more targeted, equity-focused policy approach.

Finally, we recommend that the Commission consider how to strengthen children and young people's role in the net zero transition, as our future innovators, leaders and workforce. In our recent submission to the CCA's Annual Progress Report, we outlined practical ways to embed a child rights, intergenerational, and inclusive lens in the transition to net zero, including by investing in young people's green skills and creating opportunities for meaningful participation and co-design.^{xxiii}

UNICEF Australia remains committed to working with the Productivity Commission, governments and partners to explore what a child- and youth-inclusive energy transition should look like and how it could ensure the voices of children and young people are meaningfully integrated into decision-making processes at every stage.

Recommendation 5

Embed a child- and youth-focused lens into its recommendations on clean energy and net zero strategies by:

- a) Prioritising equity in its proposed energy and decarbonisation strategies, ensuring benefits reach children and young people from Aboriginal and Torres Strait Islander communities and those in rural and remote areas and low-income households.*
- b) Recommending the phase-out of indoor gas and retrofitting low-income homes with energy-efficient electric alternatives to protect children's health and deliver significant economic and productivity benefits.*
- c) Recognising and enhancing children and young people's contribution to net zero transition by recommending greater investments in green skills and creating opportunities for co-design and decision-making.*

Conclusion

UNICEF Australia commends the Productivity Commission's efforts to design a cost-effective and productivity-enhancing path to net zero. While cost efficiency is important, traditional cost-benefit analyses overlook the broader social value and longer-term gains of child-focused investments. UNICEF Australia encourages the Productivity Commission to recognise the intergenerational economic and non-economic value of building a safer, more equitable and climate-resilient Australia.

We urge the final report to explicitly consider the rights, needs and voices of children and young people. We welcome further engagement and are ready to support the Productivity Commission, Climate Change Authority, and Federal, State and Territory governments in developing child-sensitive resilience strategies and advancing a clean energy transition that not only boosts productivity, but delivers lasting benefits for current and future generations.

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ⁱⁱⁱ Emerging Minds (October 2024). Understanding how disasters influence infants and children. Available at: <https://emergingminds.com.au/resources/understanding-how-disasters-influence-infants-and-children/>

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