



Energy Markets and Programs Division
GPO Box 1264
Adelaide SA 5001

07.08.2013

Dear Sir

**RE: Submission in response to the Review of the South Australia
REES Directions Paper July 2013**

Thank you for the opportunity to respond to the REES Directions Paper July 2013 which outlines potential changes to the REES scheme in January 2015.

Our Registered Training Organisation and Consultancy, Green Business Audit & Training, (RTO # 40352) delivers training in sustainability skills and the emerging energy efficiency industry. We are a **Skills For All** Provider and have received the highest accolades by our industry regulator ASQA. Our efforts in training in this sector have been recognised in our successful selection as a Finalist in the 2013 Australian Training Awards in the Skills for Sustainability – Educational Institution Award.

We are often engaged as 'Subject Matter Experts' and have provided input into various committees and review panels on the issue of energy efficiency, education and program development.

We work extensively with the REES program in SA, VEET in Victoria, and with other energy efficiency programs. We have significant relationships with the companies approved to deliver retrofit services to the community, and with the Field Workers themselves. We offer nationally accredited training to Approved Providers and Field workers, both in Installation of energy and water efficiency products and at Certificate IV level in home energy audits.

In addition, we offer nationally accredited training in Business Sustainability Assessment at Certificate IV level.

We welcome the results of the Independent Evaluation which highlighted benefits to cost ratio of 3.5 to 1 and we strongly agree that highly cost-effective opportunities remain in both the residential and commercial sectors. We offer the following submission to the Directions Paper for your consideration.

Background

The public consistently rate the cost of living and in particular the pressure of rising energy and water bills as key areas of concern for families and small businesses.

The need for energy efficiency is clearly established, but REES as the very vehicle doesn't seem to be moving at a pace consistent with the need.

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Stakeholder feedback

Our stakeholders include:

- Approved providers under the REES
- Peak bodies who represent persons and enterprises working in this sector
- Industry, such as those who provide energy efficient products
- Fieldworkers who install energy efficient products
- Students who aspire to work in this sector
- Recipients of REES services

In respect to the REES Program, our stakeholders have given the following feedback

1. Making provisions for additional capacity in the REES Program and increasing the number and sources for certificates to be raised in SA
2. Ensuring continuity in provision of REES services, rather than the stop/start nature of the program which affects community awareness of REES and also affects uptake of REES services. This makes it a difficult business model for companies participating in the program. It also potentially sends the wrong message as to the commitment of stakeholders to the emerging energy efficiency sector.
3. Encouraging energy retailers to expand their product range of energy efficient products available under the REES program (e.g. chimney balloons, LED lighting, draft-proofing, etc)
4. Developing a new stream of REES Assessors who specifically work with hardship cases, both residential and commercial. This would require an additional level of training
5. Encouraging Energy Retailers to increase the marketing and availability of the REES Program to the public, as very few people know about this program
6. Consider expanding the REES Program into the commercial sector, as has happened in Victoria with the VEET program. (significant energy efficiency opportunities particularly for small/medium business)
7. Harmonisation with interstate programs such as VEET (Vic) and ESS (NSW)
8. Establishing minimum standards, qualifications and skill-sets for fieldworkers to wishing to work in the program, and closer monitoring and auditing of practices so as not to allow 'rogue' practitioners to tarnish the program, quality of services to households and this emerging sector.

Specific responses to the Discussion Paper

1. Continue the scheme

We strongly support the proposal that the scheme continues until 2020 and in particular we support a national or harmonised scheme throughout Australia.

2. Re-focus the objectives of the scheme

We strongly support refocusing of the objectives of the scheme to focus on energy reduction and in particular for to focus on low income households, including the expansion of priority group eligibility. We agree with the suggestion of welfare groups and services providers regarding this expansion and in particular to the inclusion of that the working poor are potentially at great risk of energy cost hardship. However, it must be acknowledged that the concept of 'working poor' may well include a greater demographic than originally intended.

3. Consider expansion to small and medium enterprises

We support the expansion of the scheme into the commercial sector, in line with schemes in other states. We believe that small and medium enterprises will benefit greatly from inclusion in the scheme and there are significant opportunities to save energy in this sector. This should not occur at the expense of the residential sector, and a model of co-contribution of costs towards energy efficiency could be devised.

4. Improve the quality of energy audits

Audit templates

Standardisation of audits by using a standard audit template would be of great value in ensuring quality standards are met. Behavioural change in energy usage behaviours will only come about through education of householders, which takes time and is enhanced by reviewing changes made by the householder periodically after the audit. We support the inclusion of these concepts in the scheme.

Training standards

In relation to training standards, we believe the current mandatory training requirements for new Home Energy Auditors under the REES scheme, involving nationally accredited training in three units of the qualification CPP41110 Certificate IV in Home Sustainability Assessment, should be expanded to include the full qualification. We have delivered the full qualification to new and existing REES auditors throughout 2012 and 2013 with positive feedback from the participants. They recognise and value that a full qualification as minimum training will help to ensure professionalism and minimum standards of conduct in the program, and further enhance job prospects, program credibility and further opportunities in this emerging sector.

The current minimum specification for competencies relating to energy audits, dated November 2011, still includes that a person is competent to conduct energy audits under REES if:

- They have completed an Energy Friends or Sustainability Victoria's Home Sustainability Assessment Course (course code 21854VIC) and undertaken energy assessments of residential premises, or
- They have more than 12 months experience and can provide two referees substantiating competence, or
- The person was a Green Loans Assessor for the purposes of the Commonwealths Green Loans Program.

We believe these inclusions are now extremely out-dated for the following reasons: -

1. The 21854VIC course has been deregistered and thus no longer exists. Our understanding is that Energy Friends course is no longer being run by DMITRE.
2. Substantiating competence via referees hardly meets standard industry methods of conformation of competency - what is required is **assessment** of prior learning and current competency against specific industry standards.
3. We are well past the era of the Green Loans scheme, and if the wording of the reference to Green Loans in this specification is adhered to, it actually means that anyone that was an accredited Green Loans Assessor has the competence to undertake REES audits, even-though many Accredited Assessors did not complete a single audit during the short duration of the Green Loans program. Further, even if they had performed any audits under the Green Loans scheme, that scheme finished in 2010, and significant changes have occurred within the emerging energy efficiency sector since then.
4. Given there is a specific nationally recognised qualification appropriate to the role of Home Energy Auditor, it is on offer in South Australia, and is (at the time of writing) funded under the SA Government's *Skills for All* program, we contend that all Home Energy Auditors should hold this qualification as a minimum competency for the role. Experienced Home Energy Auditors who have not gained these competencies through nationally accredited training can do so via a process of recognition of prior learning with additional gap training where required.

In relation to proposed expansion of the scheme to small and medium enterprises, we contend that there should be an appropriate nationally accredited qualification applied as minimum training requirement for auditors providing services to the this sector. A suitable qualification is 30894QLD Certificate IV in Business Sustainability Assessment.

As a major provider of accredited sustainability education in South Australia, we are happy to provide further consultation on suitable nationally accredited training for Business Energy Auditors and in particular the above qualification.



ESCOSA approving a greater number
using those currently operating in

the Directions Paper. Please feel free
to elaborate above in greater detail.

Yours Sincerely



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