



13<sup>th</sup> May, 2016

**Brotherhood of St Laurence (BSL), Consumer Action Law Centre (CALC), Consumer Utilities Advocacy Centre (CUAC), the Victorian Council of Social Service (VCOSS) submission to the Department of Economic Development, Jobs, Transport and Resources, Energy Policy and Programs' Residential Efficiency Scorecard (RES) training and delivery elements consultation.**

We are pleased to have the opportunity to comment on the training and delivery elements of the Residential Efficiency Scorecard. Our organisations work to ensure affordable energy for all Australians. We all see household energy efficiency as a way to address energy affordability and thermal stress. The Residential Efficiency Scorecard is an important facet of a much needed system of support to ensure all Victorians have energy efficient homes.

Attached, please find our short responses to the consultation questions. We look forward to the opportunity to discuss them with you further.

Yours sincerely,

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## Considerations for effectiveness of the Residential Efficiency Scorecard

The RES can provide a useful trusted platform for householders to assess the efficiency of the home they live in. This will benefit all Victorian households. Low income households, in particular, could benefit from a tool like this because:

- they spend more of their income on energy than other households
- many live in poor quality homes, that are inefficient

There are however likely to be some barriers to low income households benefiting, such as:

- the cost of the home assessment
- the ability to implement changes recommended in the assessment

The tool needs to work as part of a holistic system of support for energy efficiency upgrades in existing dwellings, including:

- programs that enable households to respond to the RES assessment
- minimum energy efficiency, health and safety standards for rental properties
- strengthened energy efficiency standards for new dwellings and appliances

Additional benefits that could stem from the RES include:

- potential to stimulate employment in the sector
- an essential opportunity to capture and analyse information on the energy efficiency of Victoria's existing housing stock to improve policy and program responses to the energy efficiency challenge

## Responses to consultation questions

### 1. How do you think the Scorecard could be used to enhance existing programs or industry development?

1.1. The tool will provide a platform for more energy efficiency interventions in residential properties.

There are two ways we see this occurring:

- by providing a whole of house assessment, the tool should steer households towards the most effective upgrades
- through integration with the VEET and information about other energy efficiency subsidies, grants and opportunities

1.2. To capture information on Victoria's housing stock to better plan future policy and programmatic interventions

1.3. As a basis to introduce minimum standards in properties being offered for rental or sale

### 2. Are the proposed training requirements appropriate to deliver a Scorecard assessment? Please outline why you support, or don't support, this approach.

2.1. We support the use of existing qualifications to keep down costs and facilitate employment of previously trained assessors.

2.2. We support an onsite assessment by an experienced assessor as an effective approach to hurdle examination for assessing competency.

2.3. We advise the importance of communication skills and personal safety in the training required of in-home assessors engaging with householders about energy efficiency. We suggest consultation with the Department of Health and Human Services (Office of Housing, Property and Assets branch), regarding the training requirements of their staff working in people's homes.

2.4. We suggest the *Scorecard User Training* address any gaps identified in the existing HSA qualifications.

- 3. What elements should be considered in a code of conduct? Please identify any existing codes of conduct, or elements of these, that would be supported as appropriate for the Scorecard.**
- 3.1. The VEET Unsolicited Consumer Agreements obligations<sup>1</sup> provides useful explanation of Australian Consumer Law in relation to telemarketing and door to door sales practices. Measures will be needed to ensure the RES is not undermined by unscrupulous marketing practices, by, for example ensuring consumer rights for opting out of direct marketing are enhanced and clear.
  - 3.2. Although in a different context, the principles of impartiality, transparency and disclosure from the Energy Comparator Code of Conduct<sup>2</sup> will be important, particularly if assessors bundle RES assessments with energy efficiency product offers
  - 3.3. UK Energy Assessor Codes of Conduct<sup>3</sup> sets out useful principles for standards of conduct for energy assessors
  - 3.4. It is important that all requirements of conduct, training and accreditation are explicitly provided to potential assessors before they invest in training and pathways to accreditation<sup>4</sup>.
- 4. What level and type of insurance would be appropriate for assessors delivering the Scorecard? Please outline why you support this approach.**
- 4.1. The Department should seek expert opinion on the level and type of insurance appropriate for assessors delivering the Scorecard
  - 4.2. Other risk management and quality assurance need to be addressed in addition to insurance. This includes registration of RES certificates, complaints processes and capping the number of assessments one assessor can make in a day. There are also important lessons learned from the Green Loans scheme<sup>5</sup> such as balancing assessor numbers and program uptake, departmental support and compliance structures and capacity.
- 5. Are there any other matters relevant to this program that you believe are important to consider during program development?**
- 5.1. The cost of RES assessments for low income and energy poor households and those at risk of adverse outcomes in heatwaves and cold weather: Provision needs to be made to keep costs down, or provide additional assistance to enable those most in need to access the benefits of the RES tool.
  - 5.2. Development of low cost delivery pathways
  - 5.3. Making RES assessments available to public and community housing tenants: Public and community housing tenants, like other tenants, could benefit greatly from the RES tool. Provision should be made to facilitate the roll out of the tool in public and community housing. To achieve this the Department should engage with DHHS (Office of Housing, Property and Assets branch) to facilitate the integration of the tool into the maintenance regime for public housing.
  - 5.4. A collaborative process (with not for profits and consumers) for making improvements to the tool in a timely and efficient manner
  - 5.5. Program evaluation and outcome measures should be developed to monitor and assess the impacts of the tool
  - 5.6. Collection of de-identified RES assessment data for use in policy and program development: The lack of reliable, detailed, data on the housing quality of existing homes in Victoria hinders effective policy and program development. Provision should be made to collect and store de-identified data from the tool, with appropriate consent from participating households.

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<sup>1</sup> <https://www.veet.vic.gov.au/public/Pub.aspx?id=313>

<sup>2</sup> [http://www.cuac.org.au/images/ECCC/Energy\\_Comparator\\_Code\\_of\\_Conduct\\_self-enforced\\_\\_August\\_2015\\_Final.pdf](http://www.cuac.org.au/images/ECCC/Energy_Comparator_Code_of_Conduct_self-enforced__August_2015_Final.pdf)

<sup>3</sup> see for example: [http://www.bre.co.uk/filelibrary/accreditation/scheme\\_documents/PN\\_210-1-Code\\_of\\_Conduct\\_for\\_Energy\\_Assessors.pdf](http://www.bre.co.uk/filelibrary/accreditation/scheme_documents/PN_210-1-Code_of_Conduct_for_Energy_Assessors.pdf)

<sup>4</sup> [https://www.anao.gov.au/sites/g/files/net616/f/ANAO\\_Report\\_2010-2011\\_9.pdf](https://www.anao.gov.au/sites/g/files/net616/f/ANAO_Report_2010-2011_9.pdf)

<sup>5</sup> [https://www.anao.gov.au/sites/g/files/net616/f/ANAO\\_Report\\_2010-2011\\_9.pdf](https://www.anao.gov.au/sites/g/files/net616/f/ANAO_Report_2010-2011_9.pdf)