

DRAFT CLIMATE CHANGE STRATEGIC PLAN AND A DRAFT PLAN TO SAVE NSW ENERGY AND MONEY – SUBMISSION FORM

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Type of organisation	Other (please specify below)
Type of organisation (if other, please specify)	Professional Association [Not -for-profit]
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Is this a confidential submission?	No [Note: All submissions will be published on our website unless confidentiality is specifically requested]
Would you like to be kept up to date with the development of action plans?	Yes, please keep me updated.

Instructions

Thanks for taking the time to provide feedback on the [Draft Climate Change Fund Strategic Plan](#) and [A Draft Plan to Save NSW Energy and Money](#).

Please use this submission form template to comment on any of the specific potential actions in the draft two plans. There is a section at the end of the form where you can provide comment on the overall strategic approach we have taken.

We invite you to provide comment on each of the three priority investment areas in the *Draft Climate Change Fund Strategic Plan*. For each priority area, we are interested in:

- whether and how we should refine and deliver the potential actions identified
- whether there are other actions that should be considered to deliver the government's priority investment areas.

We have also asked more specific questions on the potential actions in *A Draft Plan to Save NSW Energy and Money*.

Note: You do not need to complete all the fields in the form: Feel free to comment on all of the potential actions, or only the ones you are most interested in.

The submission template is divided into four sections for targeted submissions:

1. Accelerating advanced energy
2. National leadership in energy efficiency (including *A Draft Plan to Save NSW Energy and Money*)
3. Preparing for a changing climate
4. General comments

Please upload your completed form online in Microsoft Word format [here](#). Submissions close at **5pm on 16 December 2016**.

1. Accelerating Advanced Energy

Please provide any comments on specific potential actions below:

Sections and potential actions	Questions	Responses
<p>2.1 Maximise investment under the national Renewable Energy Target</p> <ul style="list-style-type: none"> investigate a competitive ‘contracts for difference’ funding model to guarantee a minimum price for output from up to 250 MW of new large scale renewable energy, providing benefits to local communities build on the New South Wales 50 MW solar power purchase agreement (PPA) to expand PPAs to cover all of the renewable energy procurement commitment under the Government Resource Efficiency Policy support initiatives to make it easier for businesses, institutions and local government to buy electricity from renewable energy projects in New South Wales, such as WWF’s ‘Renewable Energy Buyers Forum’ work with the COAG Energy Council to investigate minimum emissions performance standards for new power stations and the role of government in securing an orderly exit of the existing power station fleet advocate for stability and certainty in Commonwealth Government renewable energy policy sponsor energy market reforms to improve network connection processes. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Overall, there is a missing communication/education plan/program to accompany/support these actions and plans. There is a need to encourage and support ‘energy literacy’ amongst all users (i.e. government, business and householders) that covers supply, use and efficiency.</p> <p>A recent example that could be seen to address this overarching need is the EPA’s Litter program – Hey Tossler - whereby they provide small grants for location specific programs [Council and community] plus support these with mass media communications.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>More consistency of approach is needed in NSW. The Climate Fund Actions are supported with respect to the Renewable Energy Target, however AAEE NSW notes for example, that Windfarm Guidelines have been in draft form since 2011 and that investment in windfarms is stalled in this state, because of government inactivity and uncertainty. Words in a Strategic Plan about maximising investment are not matched by actions on the ground or in the air; where non-existent turbines, which have been in various stages of development for years cannot be seen. For example: note proposed Wind Farms in Flyers Creek [near Blayney] and Bodangora [near Wellington].</p> <p>NSW needs a much more vigorous approach to the renewable energy industry and much less mixed message and rhetoric.</p>

	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.2 Attract investment in advanced energy demonstration projects</p> <ul style="list-style-type: none"> • support research and demonstration projects for emerging advanced energy technologies that could provide flexible electricity generation • support research and demonstration projects for renewable alternatives to natural gas and transport fuels in industrial applications, including concentrated solar thermal, biomass, electrification and hydrogen. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>AAEE NSW members include teachers, Council educators and community eco groups who educate the community and school groups. Resources on advanced energy should be made available so that these groups can continue and extend this education.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.3 Provide start-up funding to accelerate innovation in advanced energy</p> <ul style="list-style-type: none"> • work with established business incubators to provide dedicated programs for entrepreneurs and start-ups developing, demonstrating and deploying clean energy and supporting technologies and services • sponsor energy innovation events to facilitate collaboration among universities, industry, government and investors • develop tools to share information, connect 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>

<p>collaborators and promote energy innovation in New South Wales</p> <ul style="list-style-type: none"> • monitor the development of technologies, community attitudes, price signals and share information to encourage investment and support market growth. 	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>As indicated in 2.2 above, AAEE NSW members include teachers, Council staff and members of community eco groups as members. All these people and groups educate the community and school groups. Resources on advanced energy should be made available so these groups can continue this education and help support market growth.</p>
<p>2.4 Put the New South Wales vehicle fleet on the path to doubling energy productivity</p> <ul style="list-style-type: none"> • advocate for higher national fuel efficiency standards • investigate appropriate incentives to encourage the purchase of fuel efficient light vehicles and to retire inefficient vehicles, including through stamp duty and registration charges • provide the right 'real-world' information so that businesses and individuals can choose fuel efficient light and heavy vehicles • work with vehicle suppliers and clean energy providers to make zero emission and flexible fuel vehicles available to the New South Wales vehicle market • investigate and consider how the government could best invest in a fleet of electric vehicles, including for public transport, and charging infrastructure at government sites • investigate the case for public investment in electric vehicle charging infrastructure and the requirements for renewable energy power supply • review and extend the Green Truck Partnership approach to demonstrate new technologies for low-emissions light vehicles and freight (road, rail and other). 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Purchasing fuel efficient vehicles for government departments is an excellent direction. Again use educators to use this an example to promote clean energy.</p> <p>Much has already been done to improve the fleets of Government agencies [including Local Government]. It is acknowledged that there is still much more to do.</p> <p>Actions under Strategy 2.4 however, disregard successful programs that have occurred. They fail to build on and extend previous successes and programs. As indicated previously, in this submission, AAEE NSW is of the view that much good impact will result from reconsidering and reimplementing previous successful projects, Examples include: Local Government NSW' Sustainable Procurement program [Fleet Management component] and the various NSW Council Capacity Building projects delivered by Local Government NSW [and previously through the LGSA].</p> <p>There are previous programs that were run that could be utilised to assist here (e.g. Fleetwise) rather than creating new programs. There also seems to be a strong focus on electric vehicles. The Climate Change Fund should not hem itself in but use a term that allows for new technologies and fuels to be included when they are developed.</p>

	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>It is important that approaches to fleet management are broader than an immediate and absolute focus on electric vehicles. In part fuel efficiency of the fleet is the essential feature of the actions under this strategy. Movement to electric vehicles is laudable but costly in the short term.</p> <p>In addition, promotion of other fuel sources and alternatives is important [for example more fleet cars that can use ethanol enhanced fuel].</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.5 Build capacity of local communities to deliver and own renewable energy</p> <ul style="list-style-type: none"> • build capacity in councils in regional areas to provide advice to their communities on advanced energy • sponsor energy market and financial regulation reforms through COAG to make it easier for community scale projects to connect to the grid and share their benefits • help community energy groups to share knowledge and experience with financing and delivery models 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Community energy projects are essential for rural and regional areas, especially. Strong support and capacity building is required to enhance the skills and knowledge of Council staff about building a more effective and efficient local energy pathway. It would assist if a mechanism could be put in place which delivered cheaper energy to local communities, in circumstance where energy is generated locally. This does not occur at the moment and would be a very positive outcome for rural and regional centres and for accelerating advanced energy.</p>

<p>to get community energy projects off the ground</p> <ul style="list-style-type: none"> • deliver connection guides and business case guides for sustainable energy community and residential projects • investigate the best ways to encourage developers to share the benefits of renewable energy projects with the local community. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>AEE NSW members include teachers, Council staff and eco groups who educate the community and school groups. Resources like connection guides and business case guides on financing and delivery models should be made available so these groups can use them effectively with those they educate. Local groups may also have facilities which could be adapted to use less. Education can assist/lead community group off the ground on a journey to growing more sustainable actions, or becoming regional demonstration/pilot programs. AEE NSW could be a conduit for information and education in this space.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Education should be used as a major force to promote scientific knowledge and confound climate sceptics who still, for an unknown reason, want to hold back sustainable energy developments. While these people hinder NSW goals, we as a cooperative group working across government and non-government agencies should establish a platform for objective discussion on renewable energy and climate change and promote open discussion about ways forward for a more sustainable world.</p> <p>New and better technologies are always around the corner. This goal should allow for this and keep an open mind on what we do not know at present and what may be understood better into the future, we might need to consider.</p>
<p>2.6 Identify low-emissions pathways for emissions intensive sectors</p> <ul style="list-style-type: none"> • partner with researchers and industry to identify and assess the potential for heavy industrial sites 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>The notion of working 'with industry to share knowledge' is supported. However some clarity is required about the ways in which knowledge might be shared and how other stakeholders might benefit from this.</p>

<p>to reduce emissions</p> <ul style="list-style-type: none"> work with industry to share knowledge of emissions reduction technologies and practices based on a 'learning by doing' approach. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Personal car use [and car owners/drivers might be a sector]. Key messages about using the car less, using public transport more etc, should be strongly encouraged. This has implications for public transport planning, including bike paths etc.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.7 Reduce emissions in NSW to support achievement of Commonwealth objectives</p> <ul style="list-style-type: none"> Coal Innovation NSW continuing to support research into low emissions coal technologies and encouraging the development and implementation of these technologies, including investigating ways for coal mines to reduce their fugitive emissions, including via the Commonwealth Government's Emissions Reduction Fund strengthen emissions-performance requirements and monitoring in land-use planning and major project-planning approvals processes advocate for Commonwealth, COAG and international action consistent with the Paris Agreement advocate for improvements to Commonwealth policy and programs to address key emissions sources in New South Wales such as agricultural production systems and transport support farmers and the agricultural industry to reduce emissions or enhance carbon sequestration and attract funding from the Commonwealth Emission Reduction Fund. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>While we can't abandon coal immediately it is important for this program to focus NSW in this direction even in the medium term. AAEE NSW would support the use of the Climate Change Fund in aiding the achievement of this objective and supporting transition as a longer term focus.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>A problem with the whole strategic approach and the intent of the fund is the overarching sluggishness of the Commonwealth to demonstrate the same commitment as the NSW State Government. The draft strategy would b improved with the addition of a statement aiming for greater coordination and cooperation between federal and state governments and even local and more national leadership.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>

<p>2.8 Make Sydney the Asia-Pacific's carbon market hub</p> <ul style="list-style-type: none"> seek to make Sydney the Asia-Pacific's carbon market hub by extending Sydney's financial and business infrastructure, scaling-up Sydney's carbon market workforce and encouraging international businesses to headquarter in Sydney. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.9 Identify cost-effective pathways to reduce greenhouse gas emissions to achieve net zero</p> <ul style="list-style-type: none"> model emissions pathways and their economic impacts taking account of national and international carbon constraints and trends in both government policies and private sector action monitor and predict the impact of current and new policy initiatives on the state's emissions performance develop a plan for New South Wales to achieve net zero emissions. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Developing a plan for NSW is only a part of the action. Implementing that plan in a way that has significant impact as immediately as possible, is the key.</p> <p>Immediate actions in the plan must identify how to begin the move towards net zero now. Some actions, for example tree planting, are important in the strategic approach, but will not reduce greenhouse in the short [or medium] term. A significant number of actions in the plan must make change happen now.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>There is a higher order need for consistent and transparent public policy concerning net zero emissions. Recent changes to NSW conservation and biodiversity legislation will mean that more land clearing is possible and even likely in urban, peri-urban and rural NSW. This is inconsistent with the intent of Strategy 2.9. It is essential for the future that public policy and legislation in NSW is developed within a net zero mindset. If a policy or law impacts negatively on greenhouse gas emission, it must be reconsidered/not proceeded with.</p> <p>Achieving a net zero is laudable, but not easy. Government actions must all line up in a row to achieve this end result. It is important that government agencies model appropriate movement towards net zero, all of the time. See 3.1 below.</p>

	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>AAEE NSW is of the view that there needs to be a better definition of “net-zero emissions” This would include clarity about off-setting emission in the same time-scale they are emitted. This would mean that tree planting should not be the only action.</p>
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2. National leadership in energy efficiency

A Draft Plan to Save NSW Energy and Money provides a greater level of detail on some potential actions in the *Draft Climate Change Fund Strategic Plan*. There are more detailed consultation questions in italics with numbering corresponding to *A Draft Plan to Save NSW Energy and Money*.

Please provide any comments on specific potential actions from the *Draft Climate Change Fund Strategic Plan* **AND** *A Draft Plan to Save NSW Energy and Money* below:

Sections and potential actions	Questions	Responses
<p>3.1 Expand investment under the Government Resource Efficiency Policy</p> <ul style="list-style-type: none"> • support councils to upgrade public lighting and adopt the Government Resource Efficiency Policy. • implement government energy management and reporting systems to help agencies understand where and how to make energy savings • develop clean energy standards for new government funded infrastructure projects and investigate the best way to implement them 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>The lack of real leadership by the Commonwealth hampers and restricts the support tht the States and Territories can provide. This is a challenge for NSW but this could be turned into an opportunity, with appropriate and positive program management.</p> <p>A strong NSW Government approach might add to other catalysts for change nationally and that would be a positive outcome. The vast majority of people in NSW would be supportive of the state’s strong position and leadership on this issue, if it is communicated effectively.</p> <p>In saying this we acknowledge that the potential exists to become side-tracked in debates over whether climate change is real or not. The Fund needs to state that the government has made a decision to act and that actions do not get blocked by trying to combat these arguments.</p>

	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Consider making energy efficiency programs mandatory across all NSW Government agencies.</p> <p>Set mandatory five-year targets for each government agency, especially big energy users, schools, TAFE, hospitals, prisons and juvenile justice facilities.</p> <p>Allow all publically funded government agencies to keep within their budget energy savings made through energy efficiency measures [from a benchmark year]. This is a major incentive for change in schools and TAFE especially.</p>
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	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>The school community is a large community resource both with infrastructure (lots of roofs) and energy use that is mainly during solar generation periods of the day. Schools, particularly public schools, should be the hub for community generation projects. They should be a major focus for energy efficiency, solar generation and education. The school curriculum can use energy efficiency as a way to discuss maths and statistics, and educate children, from primary to secondary on how to change family based energy practices to reduce energy use across the community. There is a big focus on STEM education at present and a project on energy would fit the criteria and provide a real world context for learning. Schools should be given more incentives to save energy and be able to retain more of the cost savings. In Germany there is a 50/50 program where schools receive more money for projects if they can prove they have saved money from an appointed base year. See: http://www.german-sustainable-mobility.de/about-us</p> <p>Similar comments apply to the VET sector, especially to TAFE. In addition, other 'public utilities' that are large users of energy need to be targeted directly; the hospital and broader health sector, Councils and state Government agencies. Actions need to range from education and capacity building through to mandating energy reduction, setting benchmarks and targets etc.</p> <p>Leading by example is very highly rated and the resulting communication of this to the general public considered important.</p>
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	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>The development and provision of training of key people across a range of sectors is vital to the delivery of an effective climate change approach. It is strongly recommended that at the earliest stage of the program a training/capacity building ‘summit’ is held that identifies training needs, training availability, training outcomes and evaluation approaches [a MERI] related to capacity building and training. The outputs of this ‘summit’ should be used to guide resource delivery/negotiation with the training sector to meet these needs. This approach would deliver tangible, quantifiable and ongoing benefits across all aspects and strategies within the Climate Change Fund strategy and actions.</p> <p>In saying this, it is noted that there are several mentions in the Strategy and in our response to it, of ‘building capacity’ in councils. It is noted that there is much existing expertise in the local government sector about these issues. This has resulted from previous programs including Cities for Climate Protection and Energy Saving plans and even WaSIP funding.</p>
	<p><i>Q27: What is the best approach to develop higher sustainability and energy efficiency standards that can apply across a range of infrastructure types?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q28: What are the best policy options to facilitate the installation of energy efficient public lighting?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q29: What is the best way to support councils to apply GREP?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q30: What is the best way to achieve energy and bill savings from hotels used by NSW Government?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q31: Are there other ways to save energy through government procurement?</i></p>	<p>Click here to enter text.</p>
<p>3.2 Improve energy productivity for households and businesses</p> <ul style="list-style-type: none"> • accelerate energy efficient appliance standards under the national Greenhouse and Energy Minimum Standards program • consult on increasing the NSW Building and Sustainability Index (BASIX) targets for new homes to encourage industry innovation and best practice, and reduce energy bills • improve energy standards for new commercial buildings by advocating for new standards • investigate the introduction of energy standards for retail tenancies and common areas in apartment buildings. • partner with supply chains to improve the efficiency of the products available to end consumers. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p> <hr/> <p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>There is a need to be wary of actions for small business and industry that makes money for consultants but doesn't equate to efficiencies in the long run as several past programs have done. Proper project design and evaluation - the the MERI [see elsewhere in this submission] will assist the fund to manage this risk.</p> <hr/> <p>Involving the community in any consultation about BASIX is important. They can be important drivers for change in this area.</p> <p>Industry can be involved through Sustainable House design competitions/exhibitions for community. There is a good model for this in the Northern Rivers.</p> <p>Schools can also be involved in submitting designs and industry could work with and mentor design students at TAFE.</p> <p>Schools should be given more incentives to save energy and be able to retain more of the cost savings. In Germany there is a 50/50 program where schools receive more money for projects if they can prove they have saved money from an appointed base year.</p>

	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>The Housing Industry Association is a crucial partner here and should be engaged directly.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Councils can play a role here in setting up an awards scheme for both businesses and private households who can be invited to demonstrate their competitive energy saving strategies. A similar awards scheme could be introduced for schools across the LGA. The Fund could offer grants for some demonstration awards projects. And the results of these could be shared widely.</p>
	<p><i>Q8: What is the best way to keep BASIX standards up to date?</i></p>	<p>BASIX needs a built in public review period. This should occur every five years or more often. It should be transparent and lead to a significant report about achievements as well as revision of the Standards.</p>
	<p><i>Q9: How can better information on BASIX performance help consumers and industry to understand the benefits of better designed and more energy efficient homes?</i></p>	<p>See also question 8 above. Consumers will comply more and even reach beyond minimum standards, if they understand the process and why it is in place.</p> <p>There is a need for much more education of new home buyers and prospective buyers about BASIX. Provision of this should not just be left in the hands of the industry. They have a mixed agenda on this issue.</p>
	<p><i>Q11: What is the best approach to achieve energy and bill savings from common areas and shared services in apartment buildings?</i></p>	<p>A BASIX style tool for apartment buildings would be invaluable. While it is unlikely that this could be mandated for existing blocks, it would be a significant selling point for owners in new apartment buildings that had a high rating.</p>

	<p><i>Q12: Could the NSW Government achieve energy savings from precinct-scale developments, high-growth areas and by partnering with local government areas?</i></p>	<p>When new developments are proposed it should be mandated that minimum energy saving strategies are included in plans for houses across the development. Sharing of results across the development idutry will promote uptake elsewhere.</p>
	<p><i>Q13: What would be the benefits and impacts of encouraging precinct-scale or local government area energy savings for new homes and other buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q20: Reports indicate a 70% improvement on 2010 energy consumption levels deliver significant and cost-effective energy savings for new commercial buildings. What level of stringency increase should the NSW Government advocate for to deliver significant and cost-effective energy savings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q21: What role, if any, could the NSW Government play to help businesses access private finance to help them adjust to improved energy standards for new commercial buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q22: What other approaches could be taken to achieve energy and bill savings from commercial buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q23: What are the potential benefits and impacts of this option?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q24: What other approaches could be taken to achieve energy and bill savings from large retail buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q25: What are the potential benefits and impacts of this option?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q34: What is the best approach for the NSW Government to support the acceleration and expansion of GEMS?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q36 Are there opportunities to enhance the national Energy Rating Label system that could deliver significant energy savings?</i></p>	<p>Click here to enter text.</p>
<p>3.3 Support industry to realise cost-effective energy productivity opportunities</p> <ul style="list-style-type: none"> • support large energy users to investigate energy savings opportunities. • support industry sectors to adopt best practice energy management practices 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>

	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>As indicated above schools [both Government and non-Government are an important target. Previously undertaken effective projects need to be revisited and delivered in a continuing way. For example:</p> <p>The Climate Clever Energy Savers program was delivered to over 1400 teachers in over 1100 schools at its conclusion in 2014. The project was supported in regions by the Environmental Education Centres. Through the project students investigate issues related to energy use in their school and community, and develop and then implement energy reduction plans. It was positively evaluated and then discontinued.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Local demonstration sites and projects are important mechanisms for driving change in communities. A number of these exist across NSW, mostly driven by Councils. For example: The Northern Rivers Sustainable House Event. In 2016 this resulted in 80 entries that were enjoyed by over 1500 viewers. The 2016 Design Competition culminated in a Showcase Awards and Expo at Mullumbimby Civic Hall in September 2016. Programs like this need to be supported and extended.</p>
	<p><i>Q14: What is the best approach to providing funding support to large energy users to prepare plans?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q15: The NSW Government could determine program participation by targeting a set a number of large energy users, or by setting an energy consumption threshold.</i></p> <p><i>What is the best approach to determine which large energy users could be included in a program?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q16: Payback periods or internal rates of return could be suitable ways to determine what makes a 'cost-effective' energy efficiency opportunity.</i></p> <p><i>What is the best approach to define 'cost-effectiveness'?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q17: Are there instances where large energy users should be exempt from preparing a plan? If so, under what circumstances?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q18: Is requiring energy management systems similar to those applied in Germany or the United States appropriate for large energy users in NSW?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q19: Are there other initiatives or approaches that NSW should consider that could be effective in enabling large energy users in NSW to implement cost effective energy efficiency opportunities</i></p>	<p>Click here to enter text.</p>
	<p><i>Q26: What opportunities may be available to the NSW Government to further promote waste heat recovery?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q34: Are there opportunities for the NSW Government to work with the hot water industry to explore innovations that can save energy and money?</i></p>	<p>Click here to enter text.</p>
<p>3.4 Drive clean energy upgrades for rental households</p> <ul style="list-style-type: none"> • provide ratings for homes at the point of sale or lease to help renters and buyers know which properties would be cheaper to run and more comfortable to live in • improve energy performance of tenanted homes to make them more affordable and liveable for renters. • provide financial incentives and/or access to affordable finance for landlords to improve their properties to make them more energy efficient • investigate opportunities to work with other jurisdictions on common approaches to energy efficiency in rental properties. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>These actions are innovative and are supported. They acknowledge that renters have very few options available to them to reduce energy use and costs.</p> <p>In order to implement them however, an education/engagement strategy is required so that landlords and their tenants are informed about the rating scale, financial incentives etc.</p> <p>Beyond this, it is noted that uptake will be voluntary and it is noted that this will have limited impact. AAEE NSW submits that mandatory approaches should be considered, in order to drive energy reduction in this sector.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>The Fund can help key organisations to drive discourse and argue cogently that certain climate deniers need to provide clear scientific proof to support their judgements. While this “noise” continues as an irritant by cropping up in the media, it will be difficult to implement many of these actions.</p> <p>Also the Fund needs to encourage and support ‘energy literacy’ that covers supply, use and efficiency. Energy efficient homes and appliances need to be used correctly to achieve their efficiencies and (as we have found with rain water tanks) a lot of people don’t know how to use these in their homes and so don’t achieve the savings.</p>

	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>The social housing sector is important. With regard to their engagement with energy choices, they are in a similar position to other renters, but the landlord is the NSW Government. Hence both landlord and social housing tenants should be targeted directly and urgently.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
	<p><i>Q1: What are the best approaches to deliver a ratings program in a way that will drive implementation of energy efficiency and grow the market for energy efficient homes and upgrades?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q2: What are the key attributes for a voluntary ratings program to be considered successful and justify transition to a required scheme?</i></p>	<p>It is difficult to get industry to do things voluntarily unless there is something in it for them. It is easier for individuals to do things voluntarily.</p> <p>Target big polluters as your top priority. Work on the federal government to demonstrate the same commitment as the state may be showing.</p>
	<p><i>Q3: The NSW Government has identified performance standards, technology standards, and an incentive program as potential approaches to improve energy efficiency standards for tenanted homes.</i></p>	<p>Click here to enter text.</p>

	<p><i>Q4: Housing stress includes rent and energy bill pressures.</i></p> <p><i>What are the best approaches to reduce energy bill pressures for tenants without increasing housing costs and why?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q5: On-bill financing and other innovative financing mechanisms could allow owners to share upgrade costs with tenants.</i></p> <p><i>What is needed to help landlords to improve the energy performance of tenanted homes?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q6: What are the best approaches to deliver a ratings program for tenanted homes in a way that will drive implementation of energy efficiency and grow the market for energy efficient homes and upgrades?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q7: What are the key attributes for a voluntary ratings program for tenanted homes to be considered successful and justify transition to a required scheme?</i></p>	<p>Click here to enter text.</p>
<p>3.5 Support vulnerable households to reduce their energy bills</p> <ul style="list-style-type: none"> • upgrade 15% more social housing by reviewing and expanding the Home Energy Action program, strengthening partnerships and developing 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>It is difficult to get industry to do things voluntarily unless there is something in it for them. It is easier for individuals to do things voluntarily.</p> <p>Target big polluters as the top priority.</p>

<p>innovative financing mechanisms.</p> <ul style="list-style-type: none"> • as part of a review of energy concessions, the government will investigate the use of energy rebates and other innovative mechanisms to fund energy efficiency upgrades, taking account of community views • provide bill reduction advice that is tailored to the needs of vulnerable customers identified through better information. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>The actions under this Strategy 3.5 are insufficient to the intent of the strategy statement. High level and effective education and engagement will be required to identify 'vulnerable households' and to engage effectively with them. Strategy 3.5 will not be achieved unless a clear education strategy is built to guide activity.</p> <p>It is strongly suggested that additional actions relating to education and engagement are added.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
	<p><i>Q10: What is the best approach to help vulnerable households save energy and money?</i></p>	<p>Click here to enter text.</p>
<p>3.6 Support small businesses to increase their energy productivity</p> <ul style="list-style-type: none"> • invest in market capacity to deliver innovative energy efficiency products and services to small businesses and collect data to inform the Energy Savings Scheme • continue to provide energy efficiency training to general business advisers. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
	<p><i>Q32: Are targeted incentives an effective way to deliver energy savings and kick-start new activities in the Energy Savings Scheme?</i></p>	<p>Click here to enter text.</p>

	<i>Q33: Are there more effective ways to grow and transform the market for energy efficiency products and services?</i>	Click here to enter text.
<p>3.7 Ensure that 40% of participants in the NSW Government clean energy program are in regional NSW</p> <ul style="list-style-type: none"> provide information on the business proposition for energy efficiency service providers in regional New South Wales such as a map of known energy efficiency opportunities. 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?	<p>The action under Strategy 3.7 is totally insufficient to the intent of the strategy. First of all the Government should set an overall participation rate target for the clean energy program. This is not evident.</p> <p>Once that is established, high level and effective education and engagement will be required to engage people so that this overall target can be achieved. In addition, if the intent is to achieve a target of 40% participation rate in regional NSW, then specific recruitment activity will be required for engaging people outside the metro areas.</p>
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there particular communities or industry sectors we should be targeting to improve energy efficiency?	See comments on government sectors in 3.1 above.
	Are there other opportunities for energy efficiency we should be encouraging?	Click here to enter text.
<p>3.8 Reduce peak demand through battery storage and other demand management measures</p> <ul style="list-style-type: none"> engage with the COAG Energy Council to reform the National Electricity Rules to reduce barriers to broad based demand management advocate to the Australian Energy Regulator for greater implementation of demand management by network businesses 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?	Click here to enter text.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.

<ul style="list-style-type: none"> • jump start the demand management market during the current regulatory cycle with reverse auctions to reduce peak demand using technologies such as appliance demand response and battery storage • work with network businesses and energy efficiency service providers to coordinate information required to target energy savings at grid constrained areas. 	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
<p>3.9 Identify energy efficiency measures that could double New South Wales' energy productivity</p> <ul style="list-style-type: none"> • establish an Energy and Resource Efficiency Research Hub in collaboration with the research sector to build expertise in energy efficiency and support innovators to assess the performance of new products • monitor and publish New South Wales energy use, energy savings and energy-efficiency sales data in collaboration with the energy services sector and the COAG Energy Council • research the design of programs that are more effective in influencing consumers and suppliers to save energy • provide funding to measure and verify energy savings in targeted industry sectors and technologies 	<p>Are there other opportunities for energy efficiency we should be encouraging?</p> <p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p> <p>In the past a range of Energy Efficiency programs have been designed and delivered. A number have been evaluated positively but then funding and/or support have been discontinued and momentum has been lost.</p> <p>It is strongly proposed by AAEE NSW that an action is included that involves a review of what programs have been delivered and have proved to be successful and what should be picked up again, reworked [if need be] and delivered in an ongoing way.</p> <p>The current Framework and Strategy has the feel of an strategic approach that is 'starting from scratch.' That is not the case and success needs to be built on, not ignored.</p>

<ul style="list-style-type: none"> investigate the introduction of an energy productivity target for New South Wales and the form that it could take 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>The community would benefit from the identification of sustainable houses across NSW and the delivery of a comprehensive program to use these locations as demonstration sites for community education.</p> <p>A number of sites are Council operated and meet criteria as demonstration sites. For example: the Coal Loader in North Sydney, Barret House in Woollahra, the Sustainability Hub in Randwick, and there are many more. It would be desirable to build a statewide network of sustainable houses and to undertake free education programs for the community at each location on a monthly basis. A pre-prepared workshop program could be developed to support this initiative.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>

3. Preparing for a changing climate

Please provide any comments on specific potential actions below:

Sections and potential actions	Questions	Responses
<p>4.1 Ensure 100% of NSW Government agencies are taking action to manage their climate change risks</p> <ul style="list-style-type: none"> • prepare best-practice guides, tools and targeted training to help government agencies identify and manage climate change risks • support government agencies to meet their requirement to undertake initial climate risk assessments and develop appropriate responses • develop a framework for reporting government agencies' adaptation initiatives to foster best practice • build the capacity of land management agencies to enhance bushfire management and prevention. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Guides, tools and targeted training are important education actions. But is is unclear where these will be targeted and how they will be rolled out.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>4.1 is a laudable action. Of Course all NSW Government agencies should be doing more to manage their climate change risks. However it is noted by AAEE NSW that doing more is not base-lined. Key inclusions that should be included are:</p> <ul style="list-style-type: none"> • Doing more than what they are currently doing - what baseline? • Doing more by when? • Judged by/against which criteria will an agency be seen to be 'doing more?' <p>This strategy must be made mandatory and include regular reporting to a central agency.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Case studies of good practice are an important education tool and provides examples for other like-minded agencies. These have been shown to be effective in local government and are a signifiant tool that must be developed and promoted in the program.</p>

<p>4.2 Increase awareness of climate change risks in industry sectors and local governments</p> <ul style="list-style-type: none"> provide tailored information resources and updated climate change projections, including expanding the AdaptNSW website, on practical cost-effective ways to reduce risks for local councils and communities help the primary industries, energy and infrastructure sectors understand how they can respond to climate change risks and capture opportunities build capacity in coastal councils to respond to climate change risks build capacity in local councils and joint organisations to understand and coordinate local responses to climate change impacts. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Building the capacity of local government is an essential activity for the Fund. How this is to occur is of vital importance. Mandatory training for local government senior officers and a process for supporting local government to plan and implement climate change mitigation is essential.</p> <p>Beyond this local government must be assisted in their communication about these issues in their communities. This is no small task, but their capacity to drive the understanding and behaviour of people within their LGAs is vital.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>There is a significant need to build upon successful past and current activities. For example: in schools the Climate Clever program has been successful but is now discontinued, indefinitely. Programs of this quality must form part of the Funds Strategic Plan.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.3 Grow the adaptation services market</p> <ul style="list-style-type: none"> establish an adaptation innovation fund to support innovation and entrepreneurialism that could protect our local communities and provide export opportunities investigate the need for accreditation schemes and information hubs for professional services involved in climate change adaptation such as agriculture, emergency preparedness and health 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>

<ul style="list-style-type: none"> improve building standards and planning requirements to take into account the impacts of climate change investigate and develop rating systems to assess the climate resilience of residential and commercial properties and infrastructure. 	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.4 Assist local communities to reduce their exposure to natural hazards</p> <ul style="list-style-type: none"> minimise the impacts of climate change on socially and economically disadvantaged urban, regional and remote communities through social impact investment for actions such as upgrading homes, community facilities and infrastructure assist in making private finance, such as resilience bonds, available for households and businesses to adapt to climate change through partnerships with the finance and insurance sectors support innovative pilot projects that demonstrate best practice adaptation and can be replicated in other regional communities or local government areas. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>See overall comments in Section 4, below. Essentially there is little by way of overarching strategy designed to inform and bring the community along the path with government. It needs more that resilience bonds and pilot projects. Funds need to be available in an ongoing way to engage and support local communities at risk.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>It is important for successful activity in this area to involve local and more regional community organisations in this process. If the funds are not directed to engaging community groups, the program will fail.</p> <p>AAEE NSW as a member of the Nature Conservation Council can provide significant assistance in this area.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.5 Increase canopy coverage in heat exposed suburbs and regional towns</p> <ul style="list-style-type: none"> implement a program of information, tools and 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>

<p>funds for demonstration projects to improve green cover in our cities and regional towns</p> <ul style="list-style-type: none"> investigate how to encourage the use of natural ecosystems to reduce the effects of climate change on people, communities and infrastructure, for example through flood mitigation and preventing coastal erosion. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>AAEE NSW has hundred of members and associates that support local and regional land, river, programs (see comments in 4.4 above). AAEE NSW can help to promote climate change awareness can undertake leadership and climate risk programs and help get new groups up and running.</p> <p>It is clear that Government needs a friendly broker in this area.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.6 Improve understanding of climate change impacts in priority sectors</p> <ul style="list-style-type: none"> update and enhance the state-wide climate projections developed with NARClIM, including projections for longer time periods and under different emissions scenarios produce hazard maps and reports for key hazards, such as flood, bushfire, drought and heat, to help decision makers understand risks co-fund new research on extreme climatic events, such as extreme rainfall or wind, to understand future risks as part of the NSW Adaptation Research Hub co-fund new research into climate change risks and adaptation options for priority sectors, such as primary industries, health, water security and vulnerable communities, as part of the Adaptation Research Hub identify risks to critical public infrastructure, such as energy, water, transport and health infrastructure 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>While this strategy is supported, only one of the Actions addresses the notion of priority sectors [dot point 4]. This limits the way in which the issue is to be implemented and means it will almost certainly not be achieved.</p> <p>Priority sectors do include ‘vulnerable communities’ but it is unclear what this refers to. Many communities need ‘improved understanding’ and it is submitted that this whole section needs rethinking with respect to the education it is proposing.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>

and options to manage these future risks.	Are there positive opportunities from climate change we should be targeting?	Click here to enter text.
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4. General comments

This section provides an opportunity for any general comments on the overall strategic approach of the *Draft Climate Change Fund Strategic Plan AND A Draft Plan to Save NSW Energy and Money*.

Questions	Responses
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Questions	Responses
<p>The government is interested in your feedback on whether and how we should refine and deliver the potential actions identified.</p>	<p>At the Paris Conference of 2015, 195 nations agreed to hold the temperature well below 2 Degrees Centigrade above pre-industrial levels, but 1.5 degrees is even too high. Australia agreed to contribute but on a world scale we are seen, along with Saudi Arabia, as a nation doing the least and at the top of world contributors to CO2 emitters. In spite of our comparatively small population, Australia is the 13th highest emitter in the world. In the light of this concerning reality, the Climate Change Fund has a mammoth responsibility and laudable intent. Overall it is the view of members of AAEE NSW, that the current framework and strategy does not go far enough to address the challenges at a sufficient level. Within this braod comment the following perspectives are provided.</p> <p>Policy Directions in the Framework lack the necessary in-depth focus on the community and their knowledge attitudes and behaviour. Education and engagement of the people of NSW is a significant deficiency in the approach proposed. It is almost as if the community and their education are just thrown into a few actions as an afterthought. In saying this the documents fail to refence the excellent energy education that have been delivered to date. With respect to education, the proposed approach can be characterised by two statements: it is either ‘ignore past activity and start again’ or ‘education has no role in prompting behaviour change regarding climate, renewables, advanced energy, or energy efficiency.’ Clearly both of these positions are not the intention of the proposed program, but they both appear to be.</p> <p>It would be possible and even desirable to include Education Components within each of the actions under all three priority areas. Directing funding towards each education action could be possible if there is a clear and defined outcome relating to knowledge increase and behaviour shift. Currently there is no scope for this in the consultation draft of the Framework or the Plan. In the submission above AAEE NSW has provided some input about where this might occur, but we submit that the problem is broadly structural and that the strategic approach requires a rework, so that this issue can be addressed. In saying this we are aware that this is a significant task that needs a considered approach. The following factors are important in this process:</p> <ul style="list-style-type: none"> • Actions should contain ‘suggestions’ as to how grants may fit outcomes under the actions - how do we account for education for each action. • Use scientific principles and research data to back up the case for more community engagement and education. • Work in partnership with key stakeholders like AAEE NSW to achieve real impact in this area. • Consider how educators of all sectors might be harnessed effectively to carry key messages forward and to provide a bridge for the community. • There is a need for urgent action in this area in NSW. Currently the lack of leadership and understanding demonstrated by the Federal Government puts more and broader responsibility on the States and Territories. While it is difficult to ignore the politics in this issue, science takes an objective approach and needs to be listened to more seriously and communicated more effectively.

Questions	Responses
<p>The government is interested in your feedback on whether there are other actions that should be considered to deliver the government's priority investment areas.</p>	<p>The AAEE NSW is concerned that the current Strategic Plan does not engage the community sufficiently. Many specific actions are reasonable but there is no overarching acknowledgement of the current community views about issues of accelerating advanced energy, energy efficiency, preparing for a changing climate etc. Nor is there a method for engaging the community about the whole big picture. Community members will be much more engaged in supporting specific actions if they see them as part of a whole.</p> <p>This is a significant oversight because the success of the whole strategy depends on the community, government and industry seeing the need for comprehensive and wholehearted change. Given the extent to which public policy and debate about energy, climate etc, has waxed and waned over the past few years, just throwing money at the problem, even if it is done strategically, is not sufficient. People need to be provided with education that indicates why a Climate Change Fund is important, what it will mean for them and their children, socially, environmentally and financially. This needs to clearly and strongly communicate the Government's position on this issue.</p> <p>It is absolutely essential that Government rethinks the overarching communication and engagement approach to the program and ensures resources are allocated to this important need. This should be done in collaboration with the community and its peak organisations. AAEE NSW would welcome the opportunity to be involved. This should also build upon existing and past activity and focus on evaluating programs through a Climate Change Fund specific Monitoring and Evaluation Plan process.</p> <p>There is a need for urgent action in this area in NSW. Currently the lack of leadership and understanding demonstrated by the Federal Government puts more and broader responsibility on NSW. While it is difficult to ignore the politics in this issue, smart science takes an objective approach and needs to be listened to more seriously and communicated more effectively.</p> <p>It is strongly suggested that an action is added that develops key messages for the program and circulates these to stakeholders across NSW. These would form an integral part of the proposed Communications Strategy that must become a significant underpinning component of this program. This would be supported by an appropriate program-wide evaluation regimen.</p>

