



21 December 2018

**Independent Review of the GEMS Act 2012 – Draft Report  
submission**

**C/O Ms Anna Collyer**

Appliance and Building Energy Efficiency Branch

John Gorton Building

King Edward Terrace

Parkes ACT 2600

Via email to: [GEMSreview@environment.gov.au](mailto:GEMSreview@environment.gov.au)

**RE: Independent Review of the Greenhouse and Energy Minimum Standards (GEMS) Act  
2012 – Draft Report**

Dear Ms Collyer

Standards Australia welcomes the opportunity to provide this submission to the Draft Report of the Independent Review of the Greenhouse and Energy Minimum Standards (GEMS) Act 2012. Standards Australia seeks only to respond to matters raised in the Draft Report that either directly mention Standards Australia, or are relevant to our work as Australia's peak standards development body.

**1. Recommendations relevant to Standards Australia**

Excerpt from page 73-74 of Draft Report:

*Choice has suggested that international standards could be developed with an addendum that takes into consideration the regional requirements of Australia and similar countries. Choice suggests this would make it more straightforward process to adopt international standards. Standards Australia may be able to facilitate this approach by representing Australia on international standards committees (see Section 5.2.2). Although willing, Standards Australia indicate that it would need financial assistance to undertake such a role. The benefits of representation during international standards development would need to be examined against the additional cost involved.*

**RECOMMENDATION 32**

*The Commonwealth Government request that the COAG Energy Council examine the cost and benefits of supporting Standards Australia's participation in international standards development.*

Standards Australia Response:

Standards Australia currently has an existing process in place for adopting international standards with modifications. This process is widely used and works effectively to achieve international harmonisation that takes into account local environmental or regulatory factors.

This type of international standard adoption includes an appendix to the document, outlining all of the Australian-specific modifications.

Standards Australia currently receive funding through the Commonwealth Government Support Industry Service Organisations (SISO) Programme, to support Australia's participation on international standards organisations. This allows Standards Australia to:

- Resource all international committee work where Australian stakeholders have demonstrated an interest in participating, and
- Allocate a travel subsidy for all endorsed Australian delegates attending international standards meetings. Any funding over and above the subsidy provided by Standards Australia is provided either directly by the individual delegate, or by the relevant employer.

Standards Australia does not seek any further financial assistance over and above that which it already receives from the SISO Programme to facilitate Australian membership of key international standards organisations.

## 2. Standards Australia's Recommendation

Standards Australia recommends:

- I. the below extract (pg.73) be removed from the Final Report, or further clarified. The below extract could be misleading and have the undesired effect of disincentivising participation on international standards committees, that would otherwise be compatible with the GEMS Act objectives:

*Although willing, Standards Australia indicate that it would need financial assistance to undertake such a role. The benefits of representation during international standards development would need to be examined against the additional cost involved.*

- II. that 'Recommendation 32' in the Draft Report be updated to reflect continued support for Standards Australia's coordination of Australian experts attendance at international meetings, participation in the preparation of International Standards, and continued use of the established modified adoptions pathway, where necessary.

## 3. Conclusion

Standards Australia welcomes the Draft Report, as well as the key recommendations presented in the report relevant to Standards Australia and our ongoing engagement with the GEMS Regulator. We look forward to our continued engagement with the Independent Review and seeing the Final Report in 2019.

## 4. Further contact

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For further questions in relation to this submission, please do not hesitate to contact Simona Tomevska, Stakeholder Engagement Manager, on 02 9237 6116 or via email at: [simona.tomevska@standards.org.au](mailto:simona.tomevska@standards.org.au)

Yours sincerely

Daniel Chidgey  
Head of Stakeholder Engagement

## About Standards Australia

Standards Australia is the Australia's peak, non-for-profit standards development organisation. We are a non-government organisation, and have an existing Memorandum of Understanding with the Department of Industry, Innovation and Science which outlines our roles and responsibilities, but also our function as Australia's peak Standards Development Organisation.

Standards Australia is the Australian member to the International Organisation for Standardisation (ISO) as well as the International Electrotechnical Commission (IEC). We are also a Partner Standardisation Body (PSB) with the European Standardisation Organisations (CEN-CENELEC), where we have an opportunity to partner on relevant technical committees where harmonisation with the European market is beneficial.

Our core responsibility is the development of voluntary, consensus based Australian Standards, as well as other voluntary lower consensus guidance documents. Through our membership at the ISO and IEC, we are also involved in the development and adoption of international standards.

Standards Australia publications act as a tool for public policy delivery, where appropriate, and can be referenced in regulation, legislation or contract. Standards Australia has no regulatory or legislative authority, and does not undertake any conformity assessment or certification activities.

Australian and international standards serve to enhance the nation's economic efficiency, improve our international competitiveness and meet the community's demand for a safe and sustainable environment.

## How Standards Australia develops standards

Standards Australia develops national standards, and adopts international standards through a consensus process in constituted technical committees. These technical committees are constituted by organisations which represent the interests of affected stakeholder categories that have an interest in the standards being developed. These nominating organisations comprise of industry, government, regulatory, research and consumer organisations.

Any stakeholder can propose to develop a standard, and if approved, is allocated to the appropriate existing technical committee, or for new areas of technical activity, a new committee is constituted. Standards Australia assesses projects on the basis of 'Net Benefit' to the Australian community, and this is determined through 5 broad criteria; public health and safety impacts, social and community impacts, environmental impacts, competition impacts and economic impacts.

Standards Australia utilises a consistent project development methodology for each project. This process includes project approval, project kick-off, drafting, public consultation period, committee ballot and ultimately, pending a positive consensus outcome after balloting has been finalised, culminates in the publication of the standard.