Monday, 21 May 2007

James Golden
Victorian Energy Efficiency Target Scheme
Department of Primary Industries
Level 23
80 Collins Street
Melbourne VIC 3000

By email: veet.submissions@dpi.vic.gov.au

Dear Mr Golden

RE: VICTORIAN ENERGY EFFICIENCY TARGET SCHEME

Thank you for the opportunity to comment on the Government's Victorian Energy Efficiency Target Scheme ("the scheme") Issues Paper released in March.

The Property Council of Australia represents the broad interests of the property industry. It is the largest and most influential organisation within its sector and has in excess of 2000 member companies throughout Australia, with approximately 500 of those in the Victorian division, representing property assets of over $140 billion nationally.

This submission from the Property Council (Victorian Division) responds to two issues raised in the Issues Paper: the extent of the scheme's application and the scope of eligible implementers and activities. We are also interested in implementation of the scheme.

The Property Council believes that the scheme should initially be focussed on the residential sector. Households and businesses differ in their energy end uses and the ways in which owner-tenant relationships are structured. After successful implementation in the residential sector, a review of the scheme could determine whether and how to extend the scheme to small and medium businesses.

The Property Council does not support the mandatory application of the scheme to large energy users. As the Issues Paper notes, large energy users are already subject to Victorian and Australian Government requirements in this area.
The Property Council favours a scheme with a broad range of potentially accredited parties, such as those outlined in the Issues Paper at 3.5.9. We suggest that the range of potential eligible activities discussed at 3.5.10 be expanded to include activities building occupants and tenants can carry out.

The Property Council supports the Issues Paper statement at 3.5.16 noting the importance of providing a range of information to households and industry players about the scheme's opportunities and requirements. The Property Council offers its assistance to Government in developing implementation materials for relevant industry sectors.

If you have any queries about this submission, please contact Property Council policy analyst Karen Dowling on (03) 9664 4230 or kdowling@vic.propertyoz.com.au.

Yours sincerely

[Signature]
Jennifer Cunich
Executive Director
Victorian Division