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HELPING MARKETS  
WORK BETTER

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27 February 2020

Ministry of Business, Innovation and Employment  
Wellington, NZ

Dear Sir/Madam

### **FEEDBACK ON 'DISCUSSION DOCUMENT: ACCELERATING RENEWABLE ENERGY & ENERGY EFFICIENCY'**

Please find below our feedback in response to the Ministry's request for feedback on the discussion document 'Accelerating Renewable Energy and Energy Efficiency, December 2019'.

#### About JAS-ANZ

The Australian and New Zealand governments established JAS-ANZ by treaty in 1991. Its goals include:

- Integrity & Confidence: To maintain a joint accreditation system that gives users in Australian and New Zealand confidence that goods and services certified by accredited bodies meets established standards.
- Trade Support: Obtain and maintain acceptance by Australia's and New Zealand's trading partners for domestic management systems and exported goods and services.
- Linkages: Create links to relevant bodies that establish or recognise standards for goods and services or that provide conformity assessment.
- International acceptance: Obtain mutual recognition and acceptance of conformity assessment with relevant bodies in other countries.

JAS-ANZ works collaboratively with key networks, stakeholders and end-users to drive priority accreditation impacts. The relevance of this to MBIE's consultation is that JAS-ANZ can be a key credible provider of services to inform, manage and/or assist in the development and on-going maintenance of regulatory certification schemes in the energy and energy efficiency sector. JAS-ANZ already endorses and administers the accreditation of the Toitu carbon accounting/management schemes, and the ISO50001 energy management certification scheme.

#### ISO 50001 – Energy Management Certification Scheme

The consultation document notes possible relevance of ISO50001 (Page 50, Table 3) to assist with corporate energy transition plans. We believe that the potential of ISO50001 may not have been fully realised. This standard systemises energy management and energy efficiency via a robust management system framework. It has the potential to be as revolutionary for energy management as ISO9001 has been for quality management. ISO50001 is applicable across all business sectors, and well suited for medium to large businesses and energy users. Continued certification to this standard is conditional on an organisation demonstrated continued energy efficiency gains,



and this is subject to scrutiny via third party audits. Importantly, the standard provides a system by which energy management is structured, well-considered and prioritised rather than the more typically seen ad-hoc energy management.

We encourage MBIE to explore the use of ISO50001 as a tool for those energy users which falls beneath a regulatory threshold (e.g. NZ ETS or new requirements arising from this consultation) for energy management.

JAS-ANZ has endorsed the International Standard Organisation's energy management certification scheme (ISO50003/ISO50001) and it is available for uptake in New Zealand. However, there are current impediments to its uptake being something of a chicken/egg situation:

- There are few energy management experts/consultants in NZ able to support businesses in their endeavours to comply with ISO50001
- Certification bodies have not sought to offer ISO50001 services in NZ due to limited awareness and therefore demand
- There are few auditors experienced in ISO50001 to support certification bodies and audit their clients.

In effect capacity building is required. We would encourage MBIE to meet with us to understand ISO50001 with a view to ascertaining whether capacity building would provide some of the solution to addressing NZ energy business needs.

To understand the potential of structured energy management and ISO50001, we refer you to this recent publication <http://www3.cec.org/islandora/en/item/11823-supply-chain-energy-efficiency-through-iso-50001-how-guide-your-company-en.pdf>, which presents case studies on investment/energy savings for a range of businesses. It also presents an excellent synopsis of ad-hoc versus structured energy management.

#### Scheme confidence

Section 8 of the consultation document considers examples of carbon and energy offset schemes. We note that only one of the case studies is underpinned by accreditation; it will be important that whichever solutions MBIE evolves and supports, that it considers public expectation of assurance (e.g. accredited/non-accredited, regulated/voluntary).

#### JAS-ANZ can assist

(Q8.20; Q8.23) JAS-ANZ is available to evolve and consider endorsement of New Zealand or International Standards in context of regulatory or voluntary certification schemes. Personnel are available in our Wellington office to assist MBIE understand the accreditation and certification processes, resourcing and costs.

Please contact the undersigned if any clarifications to the above comments are required.

Yours Sincerely

Simon Bannock, Sector Manager - JAS-ANZ

JAS-ANZ



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