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21 December 2018

Independent Review of the GEMS Act 2012  
Appliance and Building Energy Efficiency Branch  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

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

**Greenhouse and Energy Minimum Standards Act 2012 review – draft report November 2018**

Dear Ms Collyer,

Thank you for the opportunity to review the draft report into Greenhouse and Energy Minimum Standards (GEMS) Act 2012. Ai Group broadly supports the recommendations subject to our comments below:

- Alternative standards development – Ai Group (noting recommendations 6, 31 and 32) would like to see a more definitive statement regarding the default use of Standards Australia standards development processes. Current recommendations leave the Government free to pursue alternative standards development processes without a commitment to consensus.
- Transition period – Ai Group (noting recommendation 8) would like to see that the Act is changed so that a default transition period of 2 years is provided for with Ministerial power to vary it. The act of Government consultation with stakeholders does not always result in a workable implementation date.

We welcome the opportunity to discuss any element of this submission with you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Thomson'.

James Thomson  
Senior Adviser Standards and Regulation