

The Renewable Energy Sub Group Secretariat  
Renewables, Offsets and COAG Branch  
Department of Climate Change  
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Just to small submission from me to make one important point:

The RET must not include solar hot water heaters. Including non-generating technologies within the targets is not appropriate or effective. Solar hot water heaters are essentially an energy efficiency measure, and should be encouraged by a separate scheme.

Why is this important?

1. Buyers of solar hot water systems which create deemed RECs are not aware of the market, and incorrectly assume that their purchase has a net impact on carbon emissions. When in fact, as their purchase simply offsets renewable generation, their purchase of a solar hot water heater has no net carbon reduction impact. People spend extra money on solar hot water in the belief of a carbon benefit which is not real. It's not right to mislead consumers in this way.
2. As the carbon reduction from solar hot water heater installation depends on the generation offset, no actual reduction in fossil fuel generation is guaranteed. Indeed, if the buyer already uses accredited GreenPower, there will be zero reduction of fossil fuel generation. Further, given the above point about offset of renewables, the purchase of a solar hot water unit by someone who uses accredited Greenpower will actually cause a net DECREASE in renewable energy and INCREASE of carbon emissions.

Kind Regards

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