

# 2025 Safeguard Stakeholder Forum

## Q&As

18 November 2025

Responses to questions submitted at registration and during the forum that were not answered are provided below.

Several questions relating to policy matters were submitted by attendees. The Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) is responsible for developing Safeguard policy and we have referred these questions to DCCEEW for its consideration.

Our [2025 Safeguard Stakeholder Forum webpage](#) has further information about the event.

### **Q: Who are the members of the Energy Security Safeguard Industry Reference Group (ESSIRG) and what is its purpose?**

**A:** ESSIRG members are Solar Accreditation Australia, Clean Energy Council, Energy Savings Industry Association, Australian Energy Council, Lighting Council of Australia, NSW Building Commission, Fair Trading, Justice and Equity Centre, Energy Efficiency Council, Australian and New Zealand Water Heater Association, DCCEEW and IPART.

IPART and DCCEEW are committed to authentic and transparent communication and engagement with our stakeholders. IPART and DCCEEW work with stakeholders in the Energy Security Safeguard (**Safeguard**) schemes through the ESSIRG to:

- obtain stakeholder input on scheme matters
- share compliance and regulatory information with external stakeholders
- provide information and updates on DCCEEW programs, projects and activities related to the Safeguard schemes
- identify emerging issues and risks within the Safeguard schemes and discuss potential solutions
- share data, intelligence and discuss trends.

Note: The ESSIRG will not review compliance information regarding individual Accredited Certificate Providers or installers, however, it will review trends obtained from all audits and industry representation.

Working with stakeholders in the Safeguard schemes through the ESSIRG delivers benefits including:

- policy and program development
- improved compliance outcomes
- identification of opportunities to innovate
- better understanding of issues and trends affecting the industry

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present. We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

- opportunity to consult on potential changes to relevant regulations and Rules
- identify opportunities for improvement both within the industry and government
- promote better outcomes for NSW consumers.

**Q: How can I report misconduct?**

**A:** We are targeting our compliance efforts to identify improper conduct. You can help us by reporting alleged non-compliance to us. Where possible we ask that you provide specific details and evidence to support your concerns as it allows us to better investigate these matters. More information is available on our [Report misconduct](#) page.

**Q: How do ACPs and/or installers know what the requirements are (for example labelling requirements and whether circuits need to be upgraded)?**

**A:** The ESS and PDRS Rules clearly sets out the requirements of the schemes, which include complying with relevant standards and other legislation. Installers should confirm scheme requirements with their ACP. ACPs may also consult the Building Commission or access professional consultants to confirm requirements such as those relating to labelling and electrical work.

**Q: With the introduction of the product warranty requirement, could you clarify what liabilities this may impose on us as Accredited Certificate Providers (ACPs)?**

**A:** Product warranty requirements for heat pump water heaters under the ESS and PDRS Rules apply from 1 December. Where you replace a heat pump water heater with an Insulated Storage Volume of 700 litres or less:

- the equipment provided by the manufacturer(s) of the heat pump unit and tank must have a warranty against defects covering at least 5 years from the date of installation, purchase or supply as applicable; and
- if the person giving the warranty against defects is not in Australia, the warranty must also include the name and contact details for a contact in Australia in the event of a product failure.

ACPs and installers should confirm with the water heater manufacturer that 5-year warranties are in place for relevant heat pump units and tanks installed from 1 December 2025. Warranties must include an Australian contact in case the product fails. Keep evidence of the warranty.

**Q: Equipment Requirement 1 of Activity Definition D16 (air conditioners) requires installed equipment to be listed on the GEMS Register, but for multi-split air conditioning systems only the outdoor unit model number is listed published on the GEMS register. Can IPART provide clarity around this requirement?**

**A:** Equipment Requirement 1 for HEER Activity Definition D16 in the ESS Rule requires that: *"The New End-User Equipment or replacement End-User Equipment must be registered in the GEMS Registry as complying with the Greenhouse and Energy Minimum Standards (Air Conditioners up to 65kW) Determination 2019."*

Listing on the GEMS Register requires testing of the outdoor compressor with a representative sample of indoor units and test documentation including the make and model number of each indoor unit.

DCCEEW has carriage of Rule design and plans to consult on how to best address requirements for multi-split air-conditioners.

**Q: Where does the BESS2 requirement to have an agreement for services for 12 months sit in context with 'no lock-in contracts' for consumer energy supply?**

**A:** PDRS Activity Definition BESS2 (Onboard a Behind the Meter Battery Energy Storage System with a Demand Response Aggregator) requires the electricity account holder to sign a contract with the Demand Response Aggregator to provide demand response capacity for at least 12 months. The PDRS Rule does not require that the account holder is "locked in" to the contract.

**Q: We had some questions about timelines and communications for Rule changes.**

**A:** DCCEEW develops the policy and legislation for the Safeguard schemes, including consulting on and making changes to scheme rules. See the [NSW Climate and Energy Action website](#) for more information about recent Rule changes and the rule change process, and to register for updates.

IPART helps ACPs and others understand how to comply with the rules and monitors compliance. Once a new ESS or PDRS Rule is published by the NSW Government ('gazetted') we make sure our stakeholders are aware of the changes and where to find the information about the Rule change on DCCEEW's [NSW Climate and Energy Action website](#).

We also update our own guidance and documents to reflect rule changes. More information is available on the [News and updates](#) page of our website (information about the most recent Rule changes is available [here](#)), as well as our [ESS Rule](#) and [PDRS Rule](#) pages.