ENM SOLUTIONS

ENM Solutions Submission

Review of the Australian Energy Regulator (AER) exemptions framework for embedded networks.

February 2024

Submission to AER Review of the exemptions framework for embedded networks

Stakeholder Questions

1. **Do stakeholders consider one factor or principle should take precedence over another? If so, what weighting should we give the various principles or factors provided by the Retail Law and set out above, to support any case for change to the exemption's framework?**

ENM Solutions agrees with the proposed criteria to guide the AER's assessment to deliver on the NEO; however, we note that the evaluation of the factors and principles will be determined by the lens that is applied to define "long-term interests of energy customers". An example of this is downward pressure on pricing, which may be in the short-term interests of consumers, that does not include the cost of purchasing renewable energy (such as GreenPower) or repaying capital investment into locally generated or stored energy.

Based on the concerns the AER has expressed in this issues paper pertaining to barriers to retail competition, monopolistic pricing, and a limited ability to monitor and enforce, the principles and factors that may best take precedence are those directly relating to these concerns. Within those outlined, the below principles/factors may take precedence:

- NERL Principle – Exempt customers should not, as far as practicable, be denied customer protections afforded to other customers.
- Retail Law Factors – The extent to which conditions on an exemption, or the requirements of other laws, would appropriately govern the energy seller's behaviour and provide exempt customers appropriate rights and protections.

2. **Is the AER's proposed approach to the exemption framework review the preferred approach? If not, what other factors or criteria should the AER consider?**

Considering the AER's constraints regarding updating the surrounding energy law and rules, we believe that the current proposed approach is adequate.

We note that the AEMC's 2019 "Updating the regulatory frameworks for embedded networks" had covered many of the concerns that the Victorian Government, IPART and the AER had with embedded networks; and, we believe this review should be updated and implemented as soon as possible.

3. **Is our proposed review scope reasonable? If not, what other supply arrangements should be considered and why?**

The AER's view is that the most risk for harm is where the most residential customers are located. However, testimonies from the IPART's public forum and rapid growth in Residential Park's outlined by EWON may indicate that consideration of embedded networks within NR4 (including lend-lease communications and manufactured home estates) may be worth further consideration. Those networks on the fringe, where operators

may be self-managed, not experienced in providing billing and customer support services and without detailed understanding of how networks can deliver great outcomes for customers, may present a greater potential for harm. Representing those in deemed categories or sizes of 15-50 customers - those which are less attractive to larger players.

4. What factors are driving the increase in residential exemptions?

There are many factors that are driving the increase in residential exemptions, and ENM Solutions agrees with the AER's suggested factors driving this growth.

It would also be worth considering housing supply and affordability issues, and the push to higher density living in our cities.

5. Which factors are having the bigger influence?

ENM Solutions believes there are two primary influences that have driving the grown of embedded networks in residential settings, the first is the financial benefits and the second is network flexibility.

The financial benefits have been widely discussed.

The network flexibility for residential developments is important. In non-embedded networks, the Local Network Service Provider (LNSP) provides the energy to the boundary of the property and will utilise the infrastructure owned and maintained by the building's strata with the exclusion of the electricity meters. The LNSP uses the infrastructure, free of charge, to provide power to the end consumers, and any infrastructure costs, to the energy wiring, switchboards or other, is the responsibility of the strata. In an embedded network, the strata can recover some of the costs associated with their network infrastructure and use it to support additional services (such as solar, batteries, EV Charging etc) without the need to engage the LNSP for additional metering.

6. How common is it for new residential developments to be built as embedded networks?

ENM Solutions has no comment.

7. How do embedded networks result in lower energy prices for residential customers?

ENM Solutions would first like to point out that the premise of this question is not a fair representation of how any network should operate; an embedded network does not have to result in lower energy prices for residential customers.

From a financial point of view and in general, the average cost per kilowatt-hour in an embedded network is lower for all residential customers and common areas.

The AER's issues paper has outlined the bulk buy benefits and tariff arbitrage that allows embedded networks to offer reduced pricing.

8. **How do infrastructure costs for new developments built as embedded networks compare to non-embedded networks?**

ENM Solutions has no comment.

9. **How do higher density complexes configured as embedded networks benefit residential buyers? Please provide supporting information.**

ENM Solutions has no comment.

10. **What kind of innovative and emissions reduction arrangements can embedded networks offer residential customers?**

One of the primary benefits that residential customers can elicit from embedded networks is that the energy for the whole building can be managed with a direct benefit to each customer's electricity invoice. Innovative billing agents can provide building wide educative and informative experiences for customers, that impacts usage patterns for the whole building. Spreading usage and lowering emissions intensity.

Previously we have covered that shared solar can be applied for all tenants to benefit from, meaning that those who are not able to have their own home (or can't own a rooftop specifically) can still benefit from rooftop solar.

Building management systems and smart metering along with phone and desktop-based customer portals – also enables live choices to be made by customers that aligns their usage to the building profile and solar energy. Further improving the energy efficiency of the whole building.

11. **What other benefits are there for residential embedded network customers?**

Consideration should also be given to the cost of engaging in energy. The dollar value is one component. In our experience, there is a segment of customers working with Embedded Network Operators that place a higher value on loyalty, service, and product. Not all customers see the price they pay as the primary benefit of living in an embedded network. There is a 'cost' to an individual who is unfamiliar with energy, what a good market price is, and the time/stress involved in reviewing, deciding, and connecting their energy. Value or benefit is also derived from speaking to the same person/s every time, and familiarity and trust with the provider. Sacrificing all else to provide customers the lowest price is not necessarily in the best interests of the consumer.

Embedded networks allow decisions on pricing to be made in the interests of all occupiers of that building. Pricing can be established based purely on offering the best possible rate; it may allow for a profit margin that enables betterment of infrastructure, facilities, and amenities; and may contribute to sinking funds. All of this can be offered at a lower price to those available in the open market – with the added benefit that any profit is directed back towards the interests and direct living experience of occupiers. While this price may not be the cheapest on the market, they're protected by an existing price cap and can receive tangible benefits.

Principally, the issue of not having an Embedded Network means that other centralised services, such as solar generation, battery storage, building management systems… etc. are limited to the Common Areas / Public

Light and Power meters. This removes a significant quantity of consumption when sizing up these centralised services and takes away the benefit of sharing these assets to individual owners and tenants. It also removes the ability to have peer to peer trading through various technologies without first "exporting" to the National Electricity Market (NEM), then "importing" it to neighbours in the same private electricity network.

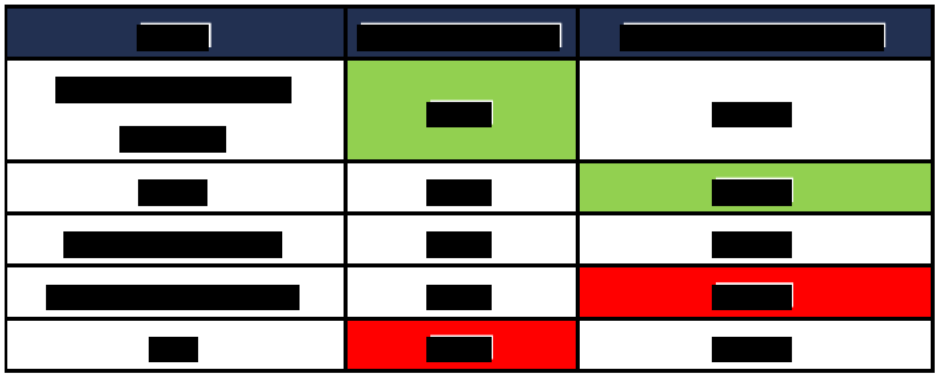
12. How should we consider any consequential benefits such as improved access to affordable housing in this review?

Following the re-branding of embedded networks within Victoria to Local Energy Networks (LENs), the Victorian Government's 'Homes Victoria' recently published a media release outlining how they are using this model to provide cheaper energy and social housing solutions. This is a great case study on how these networks can deliver positive customer experiences and outcomes, particularly for social housing initiatives.

13. What is the evidence that supports the view that embedded network customers are paying higher energy prices compared to on-market retail customers?

ENM Solutions does not provide invoicing services for customers and cannot provide evidence that exempt sellers are offering higher or lower prices compared to on-market customers. We do not hold copies of tenant invoices. Through our consulting and ENM provision, we work with many Embedded Network Operators (ENO) across the National Electricity Market. There are many scenarios where customers are being offered less than the maximum legal rate, and competing with on-market retailer offers.

As of July 2023, one such example comparisons to market offers was as below.



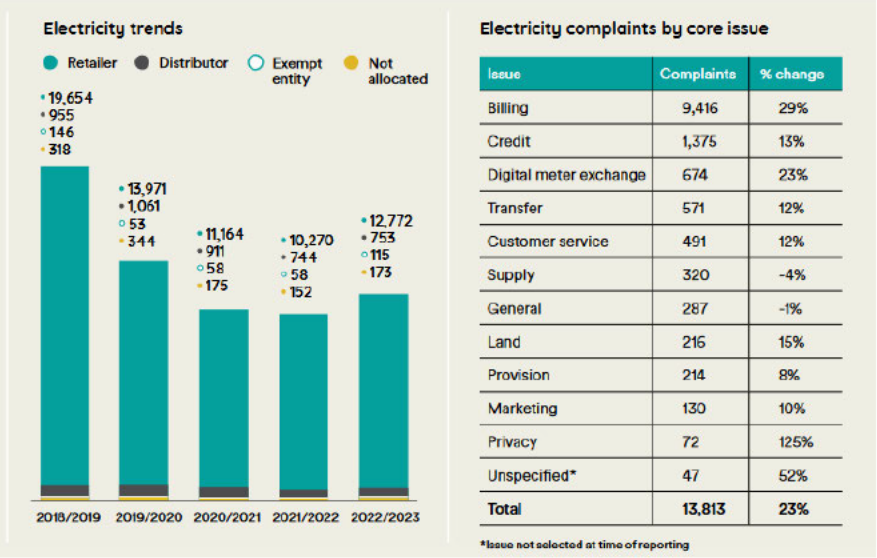
14. What evidence is available to understand the scale, extent or risk of harms?

Since the start of Power Of Choice on 1 December 2017, ENM Solutions has been acting as an Embedded Network Manager (ENM) for a variety of clients across the NEM. We have **not had a single customer** contact us in distress or expressing significant frustration at their scenario.

We don't believe the premise of the question here is fair to embedded networks, from experience with the IPART review and the banning of embedded networks in Victoria, there is a lot of conjecture based on specific examples that unfairly represent the operation of the vast majority of embedded networks.

This issues paper will consider the information available from the IPART and Victoria Government's reviews, both of which included commentary around the number of referred cases from EN customers to the ombudsman. Given the significant increase in the NR2 exemption class, the number of complaints against the number of sites and thereby customers is disproportionate to the number of market customers. This is best outlined by the Energy and Water Ombudsman of Victoria (EWOV) was only 2% of all case workload, for a customer base of 138,028 customers, eliciting 565 cases. Perhaps most importantly, only 8% of those cases heard were related to credit matters, and of Disconnection/reconnection which have greatest potential for harm – only 4.4% (22 cases). The Energy and Water Ombudsman of New South Wales (EWON) outlines in their 2022/23 Annual report that they have 298 exempt entities registered as members, the largest group of which is Residential Park's (164) and also the largest group of new members (22 of 33). This group of exempt sellers had 109 electricity complaints closed, with 115 new complaints that year, and two gas complaints closed from two received. Meanwhile, the 33 Authorised Retailers had 12,756 complaints closed for electricity, 2,979 for gas and 411 for water. EWON's reporting since 2018 (when membership became mandatory for exempt sellers, in fact also shows a decline over time in complaints (58 for electricity in 2021/22 against 146 in 2018/19. Overall, EWON experienced an increase in complaint cases for electricity (23%) and predominantly billing cases (29%) last reporting year, following a number of years of downward trend after introduction of the AER's framework (see figure 1 below). This evidence suggests that customer complaints with exempt sellers are likely to mirror market conditions and in fact since the introduction of the revised framework, customer outcomes have significant improved overall.

EWON also tabled in their Spotlight on Embedded Networks report, that they believed one of the more at risk groups in embedded networks for customer protection and access to dispute resolution, is actually small business customers. These data driven insights are crucial to understand the important role the AER's framework has played and where it can certainly be expanded, as opposed to drastically revised.



Electricity complaints by core issue

Issue	Complaints	% change
Billing	9,416	29%
Credit	1,375	13%
Digital meter exchange	674	23%
Transfer	571	12%
Customer service	491	12%
Supply	320	-4%
General	287	-1%
Land	216	15%
Provision	214	8%
Marketing	130	10%
Privacy	72	125%
Unspecified*	47	52%
Total	**13,813**	**23%**

*Issue not selected at time of reporting

Figure 1: EWON Summary of Electricity Complaints (2022/23 Annual Report).

15. What other harms do embedded network customers face?

Gaps in protection from network/retail guidelines

Within the AER's proposed Draft Network Guideline update released in 2022, there was proposed inclusions for protections of customers on network/supply arrangements and purchasing energy from a retailer of choice. Further stipulation around the requirements for supply agreements would be a welcome extension to this regulation, ensuring further protections are in place for these customers who choose to go on-market.

Impact of state-based legislation, conflicting information or resource locations

Customers searching online for information about their rights, how embedded networks operate, requirements around pricing and access to ombudsman schemes can become confusing when there is not a single source of information available. The proliferation of differences in regulation among the states can create confusion around how concessions operate, what maximum price applies and the requirements for information. The National Electricity Market (NEM) does not need to separate jurisdictional rules around managing embedded networks, specifically pricing. This is evident by Victoria's retail and network exemption frameworks closely mirroring the AER's retail and network exemption frameworks. The framework has previously been addressed by the Australian Energy market Commission (AEMC) in their 2019 final report "Updating the Regulatory Framework for Embedded Networks".

Lack of knowledge from on-market retailers

One of the harms embedded network customers face is the barrier of competition access through the lack of knowledge and business gaps of on-market retailers. ENM Solutions has experienced a variety of issues when it comes to this challenge, ranging from a retailer not realising until after their request to us that they were not set up to bill energy only, to others not established to handle the end to end requirements of wanting to replace the meter, and finally – their customer service or sales teams lacking the understanding of what embedded networks are and how customers can utilise them. In this scenario, even those operators and owners who are well setup to facilitate market access, can be let down by the structural issues of authorised market retailers who are not required to service this market. If this were the case, their ability to service these customers would be included within the authorisation requirements of becoming an on-market retailer.

ENM Solutions has experienced a scenario where we created a NMI for a customer, only for them to experience significant delays form their new chosen market retailer. This led to further interaction with their Exempt Seller, whose service and support inevitably gave them confidence to return to the Embedded Network.

16. How can we maximise the extent to which any changes to our Guidelines complements jurisdictional actions and minimise the risk of misalignment or duplication?

The recent IPART review was quite strong on moving away from the DMO as a pricing mechanism, delivering it's only two draft decisions specifically on the mechanism and approach. IPART felt that the ceiling offered by

the DMO was too high and not representative enough of the market rates most customers access within the market. However, we would note that it is not the role of the AER and regulatory bodies to secure customers the best deal, only to ensure they can access one should they choose. We are supportive of the existing approach and encourage the AER to engage with jurisdictional bodies to ensure their actions are fed through the appropriate channels within this review process, so any learnings and suggested improvements can be made for all customers. Movement towards further jurisdictional management of energy within the NEM is counterintuitive.

17. What are the risks and implications for embedded network service providers, prospective exempt sellers, customers and other relevant third parties if we require current deemed exemptions to be registered? How could any risks be mitigated?

Referencing the existing Electricity Network Service Provider – Registration Exemption Guideline, the only difference in application of core conditions to these network providers is the requirement to complete the registration. Similarly, the retail conditions for the D2 and NR2 mirror each other. Therefore, from a regulatory requirement standpoint, the risk to embedded network service providers in terms of additional burden should theoretically not be substantial. The AER should consider what impact this may have on your team, as they are the ones that will be answering the questions asked by those currently on Deemed Exemptions.

The name of the exemption class "deemed" may also need to be updated or removed to clarify that registration is required.

Many existing embedded networks do not have Embedded Network Codes allocated to them, particularly the smaller and older sites. We suggest that requiring deemed exemptions to be registered will then require LNSPs to create the EN Code promptly.

Lastly, the Embedded Network Manager role is central to facilitating retail access for customers in embedded networks. Requiring all residential exemptions to become registrable, would align with the requirement to appoint an ENM and ensure there is always ready access to retail competition for NMI creation.

18. How should we measure the benefits to consumers of registration?

Stringent Application Requirements Improving Customer Outcomes

Requiring all NR2 exemption applications to have stronger information requirements at the application stage will put pressure on smaller operators to comply earlier in the process. Adding reporting requirements will then allow the AER to oversee the operation of most residential embedded networks, which can then be used to justify the benefits to customers. This would increase the compliance requirements and either push operators to improve or exit the industry – resulting in improved customer outcomes.

Price monitoring and reporting

Requiring all NR2 exemption applications to have reporting requirements on their pricing each year can allow the AER to better monitor pricing in these residential networks, which can be used to inform price caps.

Access to retail competition

Requiring operators to submit their procedure or responses to retail competition access will improve knowledge of exempt sellers in these networks, ensuring that customers are being given the correct information, and exempt sellers are setup to support their choice. Providing the standard process outline defined by the AER would also be valuable, for authorised retailers, LNSPs, Embedded Network Operators, and Embedded Network Managers.

Customer protections

More educated operators, owners, and controllers of embedded networks will be better placed to support the customer protections required. The process to complete a registration is not arduous, and can be tailored as the existing process is, to adjust based on the number of customers. This can ensure that the information provided to operators within the ND2 category is suited to their needs. Adjusting the existing use of ND2 to become two registered classes, NR2a <10 NR2b >10, may ensure greater transparency, ombudsman membership and appropriate customer protections are communicated.

Access to upload of regulatory requirements

Requiring exempt sellers to upload documentation and information for their networks enables the AER to access this information and conduct random sampling of the quality and data available. Should any issues requiring AER attention come forward, all relevant documentation would be on hand for assessment and reference against what the customer is experiencing or has reported. These can be used to assess compliance and how exempt sellers/suppliers are meeting their core conditions of exemption.

19. **What are the risks and implications for embedded network service providers, prospective exempt sellers, customers and other relevant third parties if we revised the NR2 registrable network class exemption activity criteria to include prescribed customer benefits that must be met by NR2 registrable network class exemption holders? How could the risks be mitigated?**

The requirements themselves must be very clearly defined with the understanding that not all private networks will have equal capability to incorporate the same level of "customer benefits", specifically pricing or renewable energy. Prescribed benefits should be relatively permissive in their function, enabling providers and owners to deliver on varying competitive advantage to deliver competitive services and benefits to customers against other providers.

Defining how a "prescribed customer benefit" is assessed would also be crucial to this requirement. This may be better linked to the requirement to meet certain carbon reductions or other green/renewable targets. Worth noting that within the market there is no requirement to pass on benefits to consumers from renewable or clean

energy technologies, and therefore why should an embedded network be any different. Over time this has become self-incentivised with improvements in market access from upgrades to metering and infrastructure, driving network operators to improve their offerings and pricing for customers to prevent them going on-market/leaving the network. The alternate point of view could also be that there will be Occupiers who do not care at all about clean/renewable energy and will feel forced to engage in something that they will have 'no choice' of.

Overly prescriptive benefits run the risk of limiting innovation and design of embedded networks to meet the varying wants and needs or the market, aligning only to those defined within any requirements, rather than risk being turned down in their application.

Any prescribed benefits should align to the NEO and the NERL principles in granting exemptions.

20. If we were to prescribe a list of specific embedded network customer benefits, what could be included?

Any prescribed benefits of embedded networks should mirror those applicable to on-market retailers.

These could include renewable or clean energy technologies, meaning Energy Efficiency, smart systems, and demand management. Currently an Embedded Network could obtain a NABERS Rating for their energy use, contributing to the improvement of Energy Efficiency on site and environmental impact.

21. What other regulatory approaches would enable the AER to ensure future embedded networks are beneficial to customers?

More frequent reviews of the exemption guidelines would be beneficial. It would mean that the documents can be adapted and improved over time to incorporate a whole raft of issues relating to the distribution and sale of energy, which will ultimately benefit end consumers.

It would also be valuable to have 'energy only' offers published by the ROLRs, as this could then be utilised by customers as a benchmark offer. It could then support the process of authorised retailers to invoice for energy only, instead of retailers pushing customers away.

22. What are the risks to embedded network service providers, prospective exempt sellers, customers and other relevant third parties if we introduced a requirement to apply to the AER to register an NR2 network class exemption?

Given that the exemption framework for registered embedded networks relies on the public register, this may present a risk if there are delays in applicants. The AER will need to define an estimate of the timeframe for an NR2 to be reviewed and approved/denied. We note that there is currently no confirmation process to indicate that the public register has been updated, meaning that registrants will need to check the website for an undefined period for confirmation. Without a timeline, this may also create further work and contact with the AER Exemptions team as registrants follow up publication.

Another potential risk for existing deemed exempt networks may be that they are not able to meet the new requirements of registration. If this occurs, there what is the process and who will wear the costs associated with dismantling the embedded network.

23. **What are the implications of requiring embedded network service providers to demonstrate customer benefits before being permitted to register an NR2 network class exemption?**

ENM Solutions has no further comment pertaining to customer benefits.

24. **What support is there to stop the expansion of residential embedded networks by closing the NR2 registrable network exemption class?**

ENM Solutions does not support closing the NR2 registrable network exemption class. Doing so would undermine the recent Local Energy Network requirements in Victoria (5% on site generation with 100% renewable power supplied), and any outcome of the IPART review that is currently running. The benefits of embedded networks are strongly supported.

25. **What would be the impacts on customers, embedded network service providers, exempt sellers, embedded network managers, and other parties if we ceased granting exemptions for embedded networks with more than 10 residential customers? Please provide information to support your views.**

ENM Solutions does not support the AER ceasing to grant exemptions for embedded networks with more than 10 residential customers. Doing so would undermine the recent Local Energy Network requirements in Victoria (5% on site generation with 100% renewable power supplied), and any outcome of the IPART review that is currently running. The benefits of embedded networks are strongly supported.

There are existing embedded networks where customers are benefitting significantly from their current arrangements, through lower prices and/or access to renewable energy. These benefits would not be available for new residential embedded networks.

Additionally, the Strata is already responsible for the maintenance of the wiring and switchboards, which is distributing energy to residential customers, and they should be supported to operate the network in line with the NEO and the basic exemption conditions of the network exemption guideline.

Without utilising their electrical infrastructure and network, they are not able to incorporate any "shared solar" unless they run a separate distribution system at the site to each residential lot. An Embedded Network allows for the sharing of electricity generation and storage assets installed on Common Property without getting stung by network charges from the local network service provider.

26. What compliance breaches should exempt sellers be required to submit to the AER, if they on-sell to residential customers?

AER's Electricity Network Service Provider – Registration Exemption Guideline Conditions

- Condition 8: Exemption not completed within 20 days.
- Condition 10: Life Support
- Condition 12: Appointment of an ENM

AER's Retail Exempt Selling Guideline Conditions

- Condition 7: Pricing
- Condition 20: Life Support
- Condition 26: Hardship

27. What performance reporting indicators would best support the AER to identify consumer trends and inform regulatory reform for embedded networks.

The AER's issues paper has explicitly stated that it has concerns of consumer harm relating to barriers to access for retail competition, customers at risk of monopolistic pricing and the limited ability of the AER to monitor compliance and enforce. Reporting indicators put forward should therefore be designed to provide the information needed for the AER to justify their confidence in Exempt sellers facilitating access and not taking advantage of customers. These may include:

i. Average residential customer energy price – by embedded network and distribution zone

This metric would enable the AER to have real data on the average price all residential embedded network customers are paying, within each distribution zone. This can be used to benchmark against the DMO or similar price caps, and against customer data from market retailers. Summary statistics could also be provided to enable the AER to understand to what extent prices vary within distribution zones and network types.

ii. Number of residential customer queries about going on-market

Tracking the residential customer queries about going on-market over time will provide real data on the interaction from customers and their exempt sellers about any interest to change retailer. This will allow further investigation over time for larger deviations in number of queries and what barriers prevent this from proceeding.

iii. Number of residential customer queries relating to price match

Combined with the average price paid by customers within EN's, tracking the number of customer queries about having their price matched to a market retailer will provide insight into how often customers are engaging with their exempt seller on their energy rate. This may also provide insight into the funnel from here to queries from customers about going on-market.

iv. Number of residential customer complaints during reporting period

The extent to which customers are dissatisfied enough or facing strong enough harms to have made a complaint to their exempt seller can provide an indication over time of the dissatisfaction or harms being faced as a result of exempt sellers operating embedded networks.

v. Number of NMI's created for Exempt Seller sites/customers going on-market.

Reporting on the number of NMI's created for exempt seller sites will provide indicative data over time on the extent to which certain operators are seeing higher churn from their sites than other providers. This may also allow for specific investigation into reasons this occurs, and whether this is structural, framework or provider related causes. This should also provide a strong indication along with number of customer queries about price and going on market, to understand where in the process this ceases or there may be true barriers.

28. What would be the benefits, costs and risks to exempt sellers, and other stakeholders, if the AER were to impose compliance and/or performance reporting obligations on exempt sellers, who on-sell to residential customers?

Exempt persons will differ in their funding and resources more substantially in comparison to licensed retailers, and the enforcement and consequences should reflect that from a financial standpoint. However, demerit point systems and compliance deadlines for 'rehabilitation' programs that put the best outcome of the consumer first should be consistent and enforceable in line with any mandatory reporting requirements that are implemented.

29. Should we extend any compliance reporting obligations to exempt embedded network service providers, via the Network Guideline?

Consideration of compliance reporting obligations via the Network Guideline may be an appropriate mechanism to consider, as much of the basis for compliant operation of a network will be drawn from the requirements and conditions of the Network Guideline. The clear issue will be differentiating between own, control and operating the embedded network, and where the obligations sit. It may be better placed in the retail guideline for the entity that sells energy to third parties.

30. Should family violence obligations be extended to exempt sellers who on-sell to residential and small business customers?

Yes, all customers are entitled to have the same obligations regardless of if they have a mains connection or fall within an Embedded Network. However, it will need to be tailored to exempt sellers. This ensures a consistent and fair framework that offers protection to vulnerable customers. Small businesses may face different challenges compared to larger businesses in meeting new obligations, but also for those small business embedded network customers that can often be family businesses. Extension of the ombudsman requirements to small business in all jurisdictions, may also align with extension of these family violence provisions to that activity class. Smaller Exempt sellers may benefit from utilising updated agreements that can be applied to both customers with inclusion of these policies for both.

31. What obligations would, and would not be feasible, to implement?

Most of the obligations proposed are feasible to implement, considering ENM Solutions does not provide invoicing services. That said, our clients vary in size, and we anticipate that there may be limitations for certain exempt sellers who may not have all the required tools and resources to implement the required changes.

Smaller operators or networks may not have the funding or resource to conduct training, which can be very expensive. Resource allocation extends beyond just the financial resources required for training, but also to ongoing monitoring, support services and processes. While some smaller networks may be better able to identify a family violence customer more readily, managing the privacy concerns may be more difficult. Balancing the need to address family violence with individuals' right to privacy can become difficult, particularly for embedded networks where the owners as managers have access to the data which in turn could jeopardise the safety of the customer, but also the safety of the individual/s holding that information.

32. Could some obligations be tailored to the specific circumstances of an exempt selling scenario? How, and what support might enable sellers to meet their obligations effectively? What additional obligations should the core exemption conditions include?

Skills Requirement Support

The AER may play an important role in developing training programs and resources that are specific to exempt sellers. Alternatively, they could support or endorse industry experts to provide this type of training. This could include modules, educational materials, such as pamphlets or online resources (fact sheets), that offer guidance on recognising signs of family violence and appropriate responses. This may be similar to the implementation of the hardship policy requirements of the updated Retail Exempt Selling guideline and involve a template that can be used by those exempt sellers not resourced to provide their own.

Training Subsidies

Financial support or subsidies for training programs could encourage sellers, especially smaller businesses, to invest in educating their staff on family violence awareness.

Recognition

Acknowledge and certify exempt sellers who actively engage in family violence prevention and support efforts.