Summary for energy efficient products and services: A regulatory reform discussion document

IrrigationNZ has lately responded to the MBIE's submission request on the options and proposals in the Regulatory Reform Discussion Document on Energy Efficient Products and Services to inform MBIE's work. The document sits within MBIE's wider strategy of transition to a low-carbon energy economy. The broader purpose is to provide a more efficient avenue for regulating products, removing redundant product classes, and make it significantly quicker and easier to maintain alignment with Australia under TTMRA.

- In its submission, IrrigationNZ noted that the organisation advocates for and supports the adoption of best practice in irrigation systems design and operation that includes issues related to pumping components and overall irrigation efficiency in the primary sector.
- IrrigationNZ also believed that any legislative change and regular review would provide certainty for those operating in the food and fibre sector, therefore, the support for updating the system to reflect current practice around the registration process.
- Further IrrigationNZ stated that the organization supports the proposal to amend the Energy Efficiency and Conservation Act 2000. Amendments entail the improvement of the regulatory system, in which the Minister is empowered to introduce new MEPS and labelling requirements.
- IrrigationNZ stressed that the legislation should be outcome-focused and regulate the efficient use of energy for food and fibre production to help avoid exceeding NZ generation and distribution capacity.
- IrrigationNZ stated its support for the proposal to set out referencing, in regulations, to guidance material approved by EECA's Chief Executive. The guidance material would be based on the Australian policy as presented in the discussion document.
- IrrigationNZ welcomed the system approach that was proposed to be applied to irrigation water pumping through this regulation. They also noted the selection of an efficient pump/motor combination is a key element of achieving whole-of-life energy and cost efficiency while specifying the elements that make a pumped irrigation system efficient.
- IrrigationNZ's preference is that new procedural layers are not added, and that any new legislative mechanism has alignment with and endorsement of existing processes that reinforce approaches to achieving energy-efficient systems.
- Instead, IrrigationNZ stated its support for legislative improvements that reduce the time and costs that may impact participants in the industry and for an internal review as an effective way of identifying and correcting minor mistakes without the cost of an appeal or judicial review.
- IrrigationNZ stated it supports a strong safety culture in the Agri-sector and suggested highlighting safety considerations with products or systems involving electrical energy in water pumping systems.
- If energy-efficient systems become a legislative requirement, IrrigationNZ would be concerned if achieving system design approvals introduces delays in developments.
- Other considerations particularly relating to pump and motor sets were said to be labelling related to product quality.

- IrrigationNZ assumes, based on the EECA E3 discussion document on expansion of the Regulated Products Registry, that pumps may be brought to the legislation covering energy efficiency labelling.
- IrrigationNZ commented about the ISO standards applicable to pumps and pumping systems, inclusive of ISO/ASME 14414:2019 Pump system energy assessment by noting that while these standards are available to pump manufacturers and specifiers of pumping systems it is not clear how widely or stringently these standards are adhered to by manufacturers especially with the supply of lower-cost equipment. Therefore, IrrigationNZ supports the development and adoption of an assessment and labelling system that asserts a level of statutory obligation on manufacturers and importers. This approach would protect the irrigation industry from the cost of premature failure, unsafe equipment, and whole-of-life energy efficiency.
- For the use of energy-efficient water pumping systems, IrrigationNZ recommended consideration of the Warmer Kiwi Homes incentive-based program.
- Given that the proposal for MEPS could potentially allow a third-party demand response service provider to remotely control the energy performance of an electrical component or system, IrrigationNZ expressed concern that the remote and automated control by a third party may introduce uncertainty if this system applies to irrigation pumping systems.
- IrrigationNZ expressed its interest in better understanding this element of the proposed changes in terms of risk associated with shedding load where irrigation scheduling may be critical.
- IrrigationNZ also suggested a focus on a scaled approach that avoids capturing small electrical systems with relatively small energy loads.
- IrrigationNZ suggested that apart from improving labelling and considering the systems approach, a review of actual load demand and emissions may inform the biggest savings.
- IrrigationNZ stated its reluctance to see any additional cost obligations imposed on the irrigation industry including farmers, growers, and equipment suppliers. An additional note was that the establishment of legislative requirements may create increased costs of conducting business without the burden of regulatory authority cost recovery beyond normal business taxes.
- Similarly, IrrigationNZ stated its reluctance to see additional compliance inspections potentially imposed on the irrigation industry. IrrigationNZ also endorsed the alignment of inspections with existing or developing legislation that already covers compliance checks.
- IrrigationNZ suggested that more time be provided to the industry to prepare for the changes as opposed to the limited four-week commencement period.
- IrrigationNZ expressed concern that if a systems-based approach is adopted, verification of energy efficiency compliance could be difficult to test. IrrigationNZ suggested alignment with the existing design and specification process as an alternative to direct testing in these cases.