



**TRADES SERVICES**

**SOUTH AUSTRALIA**

08/12/2021

Essential Services Commission  
GPO Box 2605  
Adelaide SA 5001  
[Escosa@escosa.sa.gov.au](mailto:Escosa@escosa.sa.gov.au)

Dear Sir or Madam,

**Re: Retailer Energy Productivity Scheme (REPS) Code Review 2021 – Draft Decision**

Trades Services South Australia (TSSA) is one of the oldest and largest Activity Providers under the Retailer Energy Productivity Scheme, saving energy since 2009.

In 2020, TSSA merged with MAC Energy Efficiency Group, Australia's leading energy efficiency training, auditing, and quality assurance business to create a single industry leader.

TSSA welcomes the opportunity to make a submission on the REPS Code Review 2021 regarding proposed stakeholder recommendations that were not initially incorporated into the REPS Code that took effect on the 1st of January 2021. TSSA recognises the need to have quality controls for managing activities conducted under REPS and the need to maintain systems that are administratively simple so that REPS can be created as cost effectively and efficiently as possible. We remain supportive of the REPS design and the continued focus to harmonise the Scheme with the other states.

If you have any questions regarding this submission, please contact me on 1300 430 917.

Regards,

Merrily Hunter  
Managing Director



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## 1. Consultation Questions

- 1.1. Do stakeholders support amending the existing requirement to provide an Information Statement to include the requirement to provide the name of the obliged retailer on whose behalf the activity is undertaken prior to commencement of the REPS activity (refer clause 6.1.2(b) of the draft REPS Code at Appendix 2)?

TSSA is supportive of the amendment to disclose the Obligated Retailer on the Information statement. With respect to the addition of Clause 6.1.2(b) requiring the specific obliged retailer to be identified and recorded within the information statement, this measure was common practice when the scheme was in its infancy (2009-2012), when there were fewer parties operating and fewer obliged retailers.

Obligated Retailers commonly engage with multiple Activity Providers to minimise risk of defaulting on their targets, and therefore there are several Activity Providers that service agreements across multiple Obligated Retailers. Whilst there are concerns over the administration of this measure to ensure the correct Retailer is disclosed on each activity, we believe that this additional accountability requirement will reduce the occurrence of misleading sales practices and 'pre-sales' carried out by Aggregators and Sub-Contractors.

There are multiple parties involved in delivering targets between Activity Providers and Obligated Retailers, targets can vary on occasion which means determining on initial contact with the customer on whom the Obligated Retailer presents added difficulty. As the onus of the delivered activities sits with the Obligated Retailer, TSSA agrees that for the customer to understand whom the Obligated Retailer is prior to the install will be beneficial if a complaint were to arise.

In our experience, these issues pertaining to complaints not being registered with a Retailer have more to do with the front-end sales and marketing practices of 'Aggregation' businesses, not necessarily in the installation and delivery of the REPS activity.

TSSA is of the opinion that the Code should clearly specify that all persons entering a property for the purposes of REPS is clearly identifiable as a representative of the Activity Provider e.g. Uniformed or ID tagged. This includes the sales representative and/or site assessors to give clear line of site to the responsible party.

In 2016, Chantelle Hobart from the Essential Services Commission emailed REPS stakeholders about this very issue (*see image below*), this had the effect of Retailers and Activity Providers increasing their oversight, branding and accountability matrix, however, since that time, new subcontractors have entered



the market and without this guidance being formally outlined in a Code or Bulletin, meaning subcontracted parties are generating REPS leads without disclosing the Activity Provider responsible nor the Obligated Retailer.

TSSA believes that if this measure of full disclosure and branding of all persons entering a home or business for the purposes of REPS to link that party back to the responsible Activity Provider, there would be less occurrence of non-compliance and poor sales practices resulting in customer complaints.

**From:** Hobart, Chantelle (ESCOSA) [<mailto:Chantelle.Hobart@escosa.sa.gov.au>]  
**Sent:** Thursday, 15 September 2016 3:30 PM  
**Cc:** Webster, Richard (ESCOSA) <[Richard.Webster@escosa.sa.gov.au](mailto:Richard.Webster@escosa.sa.gov.au)>  
**Subject:** REES Issues - Consumer Protection Obligations

REES Retailer/Provider

The Commission has become aware of some scenarios where REES activities undertaken by companies/individuals contracted to third party providers are not meeting the minimum requirements of the REES Code, in particular the consumer protection obligations. This email is to remind all providers of the requirements outlined in the Code in this regard.

**Identification**  
Where third party providers that are directly engaged by obliged retailers, contract further to companies/individuals to undertake REES activities, those persons must meet the identification requirements of 7.3.1 of the REES Code, including the full name of the company they are representing and the contact number for that company - this should be the details of the third party company they are representing (as engaged by the obliged retailer), not that individual contractors business or company name.

**Activity aggregation**  
The Commission has been advised that some third party providers are rolling our REES activities through an aggregation type model - thereby they are engaging numerous companies/individuals to undertake REES activities on their behalf or submit evidence/documentation to claim a REES activity. Each person undertaking activities for the purposes of REES must meet the requirements of the REES Code, including general conduct, information provision, fitness and propriety and mandatory training requirements. In this sense activity aggregation activities are not eligible to be undertaken under REES where the person undertaking the activity has not completed REES training, been assessed for fitness and propriety and does not meet the identification and other consumer protection requirements of the REES Code.

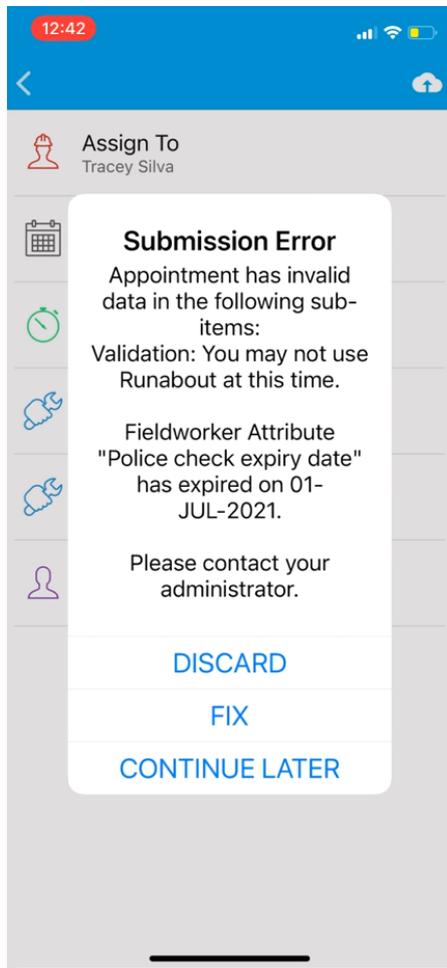
Obliged retailers are required to provide the Commission (through its annual compliance report), a description of the systems and processes in place to ensure that persons undertaking activities in a customer premises are appropriately trained, have been assessed for fitness and propriety – in most cases this includes details on third party provider training programs and training registers. Training registers must be kept up to date and only persons listed on those registers are able to undertake REES activities. The Commission encourages providers and retailers to review REES activities in conjunction with these training registers to ensure that the REES Code requirements are met.

If you have any questions, please don't hesitate to contact me.

Regards  
Chantelle

**Chantelle Hobart**  
Regulatory Officer  
(Tues, Wed, Thurs)

 Essential Services Commission of SA



1.2. Do stakeholders support the introduction of minimum standards which must be applied by obliged retailers when conducting fit and proper person assessments (refer clause 6.6.2 of the draft REPS Code at Appendix 2)?

TSSA supports the introduction of more prescriptive details on what constitutes a 'fit and proper person' assessment and encourages that the Code be amended to include all persons entering a property for the purposes of REPS rather than just Installers.

Presently, TSSA has a mandatory requirement for all fieldworkers to present a Nationally Recognised Police Check, valid licenses, and pass REPS activity training to be deemed 'fit and proper'.

Only upon TSSA receiving the Police Check and licenses, will the representative or Installer be invited to proceed with REPS induction/activity training, and participate in Company and Safety Training. These Police checks are only valid for a defined

period, and must be renewed every 2 years at minimum, with fieldworkers required to disclose any change in status. Furthermore, the ASAP and Runabout system have been designed to capture the expiry dates linked to these police checks and will lock users out of the system if the renewed check is not supplied.

*Figure 2: Runabout lock-out message*

The Code Review proposed changes to the training register requirements under the scheme (as raised by Green Energy Trading). TSSA notes, that this measure of providing training records of each installer prior to them being permitted to carry out activities is already standard practice under the REPS, any Installers that are recruited after the March cut off, still follow the same induction processes and training registers are provided to the Retailers monthly as evidence of their 'fit and proper' standing.

Due to this, TSSA does not believe this amendment to the Code will result in any material change in the induction practices of any Activity Provider. Instead, we recommend that more prescriptive measures are outlined on what constitutes as a 'REPS representative' so that all persons entering a property either for quoting, scoping, auditing, assessment, or installation purposes are covered by this 'fit and proper' check.



TSSA also recommends that greater oversight and robust checks are put in place as to the content and delivery methods of the training being provided by Activity Providers to their representatives.

The REPS Code currently requires the Obligated Retailers to submit the following training criteria in their annual compliance plans:

1. A description of the training provided to the obliged retailer's employees, contractors and/or agents in relation to the performance of energy productivity activities.
2. A description of the systems and processes in place to ensure that persons undertaking activities in a customer's premises, where training requirements are identified in the specification for that activity (as gazetted by the Minister), have fulfilled the mandatory training requirements outlined in this Retailer Energy Productivity Scheme Code.

There is no obligation to provide a copy of the training content delivered to the Installers and staff of the activity providers (only a description) also, there is no obligation on the activity providers to deliver comprehensive training that covers all of the specific REPS Code criteria – yet the Installers are required to declare on each activity record that they have carried out an activity that has met all of the minimum requirements of REPS.

► A signed statement from the installer certifying that the **energy productivity activities** have been undertaken in accordance with the minimum requirements of REPS.

We have found during field and desktop audits of Installers that in many cases of in-field non-compliance the Installer was unaware of a particular REPS requirement or had not been trained in the specifics of the REPS Code. In these cases, the installers or their team leader were given/emailed a brief PowerPoint presentation by their employing third party contractor and a checklist of documentation to gather on the job.

The Activity Providers who tend to have the highest in-field compliance rates deliver personalised and comprehensive training sessions with every installer operating in field and had a regime of regular re-fresher training.

In REPS commercial lighting activities, training seems to be a reoccurring issue specifically related to the application of BCA and AS/NZS 1680 requirements. Although electricians are aware of the electrical code they tend to rely heavily on the delivery of BCA and AS/NZS 1680 training by their employing third party contractor to ensure they are delivering compliant REPS installations. In some cases, we have found that



the training content relating to these Industry standards were only at a high level and did not go into detail about how the electrician should apply and demonstrate the specifics of the Building Code or Standards on an installation.

This provides an inconsistent experience for the customer undertaking the activity, and a high variability in outcomes and upgrade eligibility. For example, a highly trained electrician in the REPS lighting criteria may determine a space to be of a different Building Class and not pass the minimum IPD requirements to have a lighting upgrade undertaken. Whereas, a poorly trained electrician, may take a generalised approach and advise the customer that all areas can be upgraded under REPS and after carrying out the work may need to revisit, reclaim fees, or correct documentation due to the failed status of the work. Training and oversight of installers is critical to upholding the reputation and integrity of the Scheme.

### **IN OTHER ENERGY EFFICIENCY SCHEMES**

The Victorian Energy Upgrade scheme requires third party providers and accredited retailers to provide the following information on their Installer training programs:

- Training and development (All applicants) – A description of your approach to ensuring that all parties undertaking activities on your organisation’s behalf are familiar with:-
  - o All the relevant standards and requirements of the prescribed activities;
  - o the requirement to replace only appliances that are not energy efficient (in particular for lighting and shower roses)
  - o the nature of the abatement claim, i.e. lifetime abatement claim upfront;
  - o the function and importance of the VEEC assignment form;
  - o the requirement that the VEEC assignment form be signed by the consumer;
  - o the possible consequences of invalid or fraudulent VEEC creation;
  - o (where relevant) all relevant technical knowledge of any products being installed and the ability to instruct customers on correct usage.

This should include copies of relevant training aids and materials you propose to use in training staff on the above.

- o new APs provide information regarding installer training, including management arrangements they have put in place to ensure training is completed, as a condition of their accreditation.
- o APs notify the Commission of the method of completion for all trainings within 7 days of that completion and keep on file records supporting that completion.



Completion by either:

- o attending a recognised course at an RTO leading to a certificate for the installer; or,
- o recognition of prior learning or 'in house' training by an RTO leading to a certificate for the installer.

You should also describe the arrangements you have in place to keep a record of agents/installers undertaking the activities on your organisation's behalf.

## PROPOSED CHANGES

In the interest of harmonisation with other states and to ensure that activities are being delivered in a compliant manner, TSSA recommends the introduction of similar training requirements to the VEU scheme. The criteria should be addressed and provided with the annual Retailer compliance plans for approval. The clear checklist of items will create a standardised model of training expectations and allow the Commission to easily identify areas that need greater detail or any gaps to be addressed to increase compliance levels infield.

TSSA suggests the training criteria be made available via the ESCOSA website or detailed in the REPS Code as a minimum. We also suggest that the Commission specify that all participants in the REPS code whether it be office personnel or in-field staff (assessors and installers) should be trained in the specifics of the Code to ensure comprehensive understanding of the obligations and compliance requirements. This will ensure customers have a consistent experience and that all Activity Providers are training their staff correctly.

### 1.3. Do stakeholders support the clarification of record keeping requirements, such that obliged retailers must retain actual possession of all activity records for a period of five years following the completion of the activity (refer clause 4.3 of the draft REPS Code at Appendix 2).

The Activity Providers, like TSSA, are contractually obliged to maintain record keeping measures as detailed in the REPS Code, thus ensuring that customer data is maintained by not only the Obligated Retailer but also by the originator of the data (the Activity Provider).

TSSA archives data from the previous REPS years and has it 'cold stored' within its One Drive, making it still accessible, thus the amendment of this clause does not impact TSSA directly as it will continue to store the data regardless of the time period. By setting the retention period at 5 years, TSSA may proceed to employ a more extensive archival process, for REPS years falling outside of the 5-year period, opting for a customised cold storage system solution, which will still allow for cold data retrieval.



ASAP also acts as a data repository for TSSA as it stores all information relating to customer jobs and retains all versions of the Activity Record (including any amendments made), with no time cap placed by Dataforce on data retained within its system.

We are supportive of this change noting that while the storing of these records does not pose any onerous costs or processes for TSSA, it may do so for the Obligated Retailers.

#### 1.4. Do stakeholders support the proposal to require the provision of information to customers at the commencement of the REPS activity (rather than at the time it is performed)?

TSSA does not believe that the Code needs to be amended to define the point as “prior to the commencement of the activity” as when the Information Statement is delivered. TSSA currently distributes the Information Statement in two different pathways, depending on the nature of the activity.

##### *Pathway 1 (majority of activities):*

**1. Activity Summary Form**

This form is sent via email by the Installer on the day of installation activity (via Runabout) and captures the Information Statement Requirements, as well as the majority of Activity Record requirements as per Schedule 3 in the REPS Code.



**2. Activity Record Form**

This form is sent via email by the Compliance Team to the Customer within a short time period after the installation is completed (via ASAP). This form captures the Information Statement Requirements, as well all the Activity Record requirements as per Schedule 3 in the REPS Code.



##### *Pathway 2:*

**1. Activity Record Form**

This form is sent via email by the Installer on the day of installation activity. This form captures the Information Statement Requirements, as well all the Activity Record requirements as per Schedule 3 in the REPS Code.



Please note, some Activity Providers refer to Activity Summary Forms as “Leave Behind Forms”, both serving the same function. In both instances, the customer is being provided with the minimum requirements of the Information Statement.

TSSA and the majority of Activity Providers use Dataforce’s ASAP and Runabout system, through ASAP, administration users can see time and date

stamps on when emails are sent to the customer containing this documentation either via the desktop application (ASAP) or the infield application (Runabout).



Figure 2: Files & Photos section in ASAP

If the information statement is to be provided prior to the installation (assuming this is to be delivered electronically), it would not remove the requirement of the Activity Summary/Leave Behind Form, as the customer will still need to know at the point of the install key items such as which fieldworker completed the works, what was installed (i.e. brand/model), and other key installation data.

Given the documentation touch points that exist with the customer, initiating potentially a third touch point may prompt a negative experience as their participation in the Scheme becomes marred with excessive and repeated information, as in each of these instances they are largely provided with the same information.

*Proposed Changes - Pathway 3:*



Additionally, TSSA ensures components of the Scheme and product/service offering are explained to the customer through our Customer Service personnel, as well educational components covered on our website. Excessive and repeat messaging may be met with negative customer reaction and be counterintuitive in engaging with the most vulnerable members of the community.

1.5. Do stakeholders support the proposal that:

- the existence and amount of any co-payment must be clearly communicated to the customer at the time of booking a REPS activity, and
- the existence and amount of any co-payment must be clearly set out on the information statement?

TSSA communicates transparently with customers on any charges or charges that may arise either through initial contact with our Customer Service Personnel, our Contractor network or via our marketing collateral. TSSA acknowledges that despite best efforts to capture all variables prior to the install, there are circumstances or issues that can only be identified as the installation takes place, which may increase



to the cost to the customer, however the potential for this outcome is communicated to the Customer and also logged within the Job Correspondence section within ASAP to confirm that it has been relayed.

Air Conditioning installations, for example, our e-commerce and digital/print advertising details what is a "standard installation" and what are typical extras and the fees associated.

Digital/Print Flyers:

**SERENE**  
SERIES 2  
ActronAir

Premium split comfort for Australian homes.

**Standard installation includes**  
3M of Pipe and 15M of Cable.  
Extra installation charges may apply if it is not a Standard Installation.

**Diagram of a Standard Back to Back Installation**

**Additional charges and costs (all prices include GST)**

Extra Pipe	\$60.50 per metre	Side Exit Installation	\$72.60
Extra Cable	\$6.05 per metre	Roof Bracket	\$302.50
Electrical Conduit	\$18.15 per metre	Condensate Pump	\$550.00
Wall Bracket	\$121.00	Blue Stone - hole core	\$302.50
Double Storey charge	\$181.50	Circuit Breaker Enclosure	\$48.40
Double Brick	\$84.70	Regional (>50km) travel charge	\$2.75 per/km

**Small 2.6kW**  
FREE Standard Installation  
2.6kW Appropriate for bedrooms and small office areas (up to 20sqm)  
**\$499 inc GST** Supply and installation

**Medium 3.5kW**  
FREE Standard Installation  
3.5kW Appropriate for large bedrooms and sitting rooms (up to 27sqm)  
**\$699 inc GST** Supply and installation

**Large 5kW**  
FREE Standard Installation  
5kW Appropriate for lounge and larger open spaces (up to 39sqm)  
**\$1,250 inc GST** Supply and installation

**X-Lar 7.2kW**  
NOT ELIGIBLE FOR INSTAL  
7.2kW Appropriate open areas (up to 50sqm)  
**\$2,635 inc GST** Supply and installation

**Standard installation includes**  
3M of Pipe and 15M of Cable.  
Extra installation charges may apply if it is not a Standard Installation.

**Diagram of a Standard Back to Back Installation**

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SEVEN STAR ENERGY RATING

Serene is one of ActronAir's most energy efficient air conditioners yet, with our 2.6kW model reaching the highly sought after 7 star energy rating\*.

\*Star energy rating is based on the SEER (Seasonal Energy Efficiency Ratio) under standard conditions.

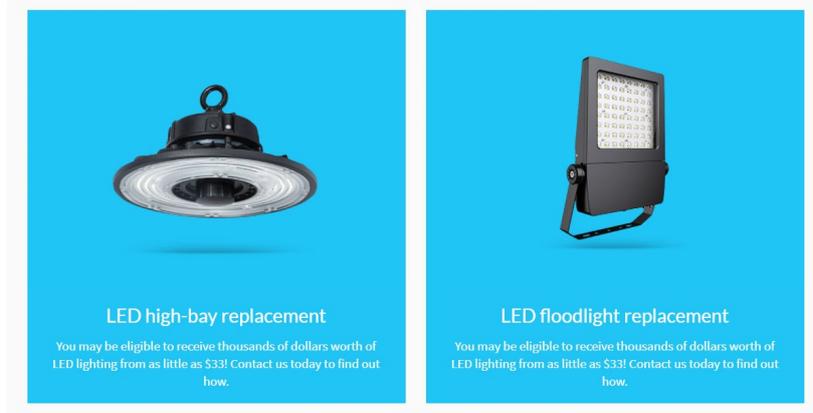
**TRADES SERVICES SOUTH AUSTRALIA**

Contact Trades Services SA on **1300 430 917**

Figure 3: TSSA AC Marketing Flyer



*E-commerce:*

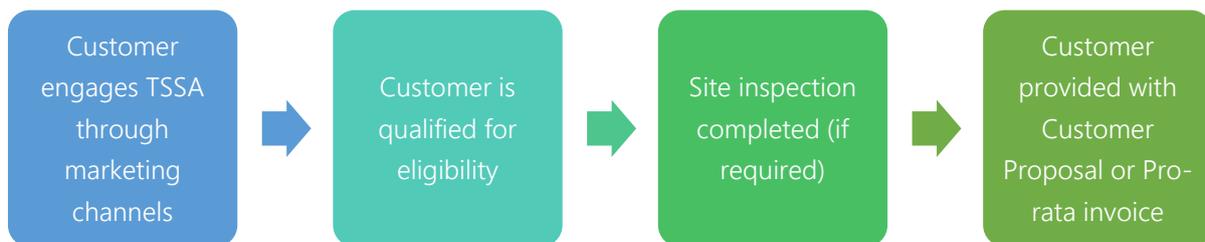


**Inspection and installation Terms and Conditions**

- Quantities may vary depending on your business environment, contact us to find out how many lights you may be eligible to receive under the REPS.
- Charges may apply for non-standard installations, switchboard upgrade, wiring upgrade and/or certain distances from Adelaide.
- All offers are available in metropolitan and greater-Adelaide surrounds until 31/12/21 or until they are withdrawn, whichever is earlier.
- Regional locations may be subject to availability of a TSSA representative. Contact TSSA to find out if TSSA operates in your area.
- Offer is subject to site inspection, with a compulsory minimum of 4 lights eligible for upgrade. Installation costs will depend on adequate power supply for replacing existing lights in the same location. Any switchboard work or upgrades will incur additional charges. Additional charges may apply if a non-standard scissor lift is required, or access requires additional equipment/tools.
- Non-working lights may need to be replaced to comply with AS/NZS1680; they may be replaced at market rates and they are not eligible for the REPS rebate.
- New installations which do not involve replacing existing lights are not eligible for the REPS rebate and will be charged at market rates. Any additional parts or materials will incur additional charges.
- Offers are for the replacement of existing inefficient lights in the same location.
- All replaced lighting will be removed from site and recycled by TSSA.
- All REPS energy credits created under this offer must be assigned to an obliged Energy Retailer that has partnered with TSSA for the delivery of the REPS. For this offer to be valid, TSSA must supply and install the lighting.
- Large business customers (those where the National Meter Identifier (NMI) / site consumes upwards of 160 MWh of electricity per annum and has done so in the last 12 months) are required to contribute a minimum of \$1.70 (incl. GST) per GJ of energy savings generated. Small businesses, those who have consumed less than 160MWh of electricity in the last 12 months) must contribute a minimum of \$33 (inc GST) towards the lighting upgrade.

*Figure 4: TSSA website (Source: [www.tradesservicessa.com.au](http://www.tradesservicessa.com.au))*

TSSA customers are taken through the following sales journey prior to a scheduled install:





All parties working on behalf of TSSA are provided instructions on communicating extras charges to the customers and detailing the mandatory co-payment requirements, which is highlighted across all training modules delivered through our online learning platform EEIQ.

- **Customer call centre scripting:** booking questions and scripting within ASAP has been designed to include questions advising the customer of the minimum co-payment requirement and additional site related fees and costs if subject to site inspection.
- **Customer Proposals or Quotes:** provide a formal indication of these costs/works and the customer is given sufficient time to enquire regarding their quote prior to proceeding with the installation.
- **Pro-rata invoicing** – if payment is made prior to the work/products taking place, the invoice is paid by the customer where all the charges are laid out and can be queried prior to install.

TSSA takes very seriously its compliance with consumer guarantees as a seller of goods (as defined under the Legislation). At TSSA, the customer experience and our ethical operations is paramount to not only acting as an Activity Provider under REPS but as a locally owned and operated business within the South Australia. Providing a customer experience that is transparent, efficient and of high quality is critical, as our ability to continue to engage and retain customers is pinned to our brand name and in field performance.

However, we note that even with all these measures and disclosures in place, there are still situations where due to the customer's unique site circumstances, change requests, variations, and alterations there may be changes to the original quoted amount at the time of installation.

TSSA recommends that there are more clear warnings exercised against those parties that demonstrate clear breach of ACCC rules with regards to consumer obligations, such as the hidden charges and those who lack transparency within their messaging to customers. Disclosure of customer co-contributions and additional costs may not be possible at the time of 'booking' due to the nature of trades-based activities and the variability of properties, however, full disclosure and customer acceptance of those out of pockets can and should be required prior to any 'Installation' taking place. As would be accepted as best industry practice, in any standard trades or building environment.

#### 1.6. Do stakeholders support the administrative amendments proposed to the Code?

Yes, TSSA is supportive of the amendments proposed.

TSSA would also like to raise another issue for consideration. Under the REPS, it is a requirement that activities are only undertaken once per premises unless specified in the Activity Minimum Specifications. TSSA have noted that in many instances, Priority Group customers face a financial barrier to having multiple systems installed on a single visit (specifically activity HC2A) and have asked if they can stagger



payments and installations over an extended period to be able to access the cost benefits of the program. The requirement of single visits for deeper retrofit activities, creates a barrier to participation due to the financial constraints of this demographic not having the means to upgrade their entire home at one interval. TSSA recommends that ESCOSA consider discussing the matter with the DEM and updating the Code and Activity Minimum Specifications to permit deeper retrofit activities being carried out multiple times at Priority Group homes with stipulations around ensuring it is a true and legitimate claim.

If you wish to discuss any of the observations or recommendations provided in this paper, please feel free to contact our team at [QA@tssa.com.au](mailto:QA@tssa.com.au) or 1300 430 917.



[reps@tssa.com.au](mailto:reps@tssa.com.au)