

Proposed evidence requirements and clarification on decommissioning requirements for activity 34



13 November 2020



We propose to strengthen the evidence requirements for high-bay product replacements¹ to mitigate risks recently identified

We invite you to provide feedback on the proposed changes by 30 November 2020.

We have updated our Building Based Lighting Upgrade Activity Guide to clarify the decommissioning and recycling requirements for activity 34.

Proposed changes to evidence requirements for high bay product replacements

We have recently conducted an audit investigation into LED high-bay installations claimed under building based lighting upgrade (activity 34) where it appears that inefficient high-bay lamp products were installed to inflate the energy consumption of the original baseline environment.

To mitigate this risk, we propose to strengthen the evidence requirements for high-bay product replacements. For such upgrades, accredited persons (APs) must collect evidence that the baseline lighting equipment was working prior to being replaced. APs must also collect additional evidence to verify the baseline lighting equipment.

¹ High-bay products are the following items listed in Table 34.10 of the VEU specifications: Metal halide lamp with magnetic ballast, metal halide lamp with electronic ballast, mercury vapour lamp with ballast, high pressure sodium lamp with magnetic ballast, self-ballasted mercury vapour lamp.





Table 1 shows the changes we propose to make to the Building Based Lighting Upgrade Activity Guide for high-bay product replacements, in addition to the current evidence requirements listed in Tables 9 and 13 of the guide.

Table 1: Proposed changes to the evidence requirements for high-bay product replacements

Type of evidence	Description
Evidence of baseline lighting configuration (non-J6 only) (Table 9 of the guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photographs of each upgraded space type showing the arrangement of at least 75 per cent of the existing lighting equipment before removal from its original position with the lighting equipment turned on, and separate geo-tagged photographs with the same lighting equipment turned off.
Evidence of decommissioning and recycling of lighting equipment (Table 13 of the guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photograph(s) of all decommissioned lamps with the lamp markings facing up and clearly legible and in focus.– geo-tagged photograph(s) of the removed ballast boxes lined up in a row² with the lamp holders facing up and in focus.

Feedback on proposed changes

We invite stakeholders to provide us with feedback on the above proposed changes to mitigate the risks we have identified in respect of some claims of baseline lighting equipment for high-bay product replacements.

In addition to these changes, the commission will be increasing its audit processes in relation to high-bay installation creation claims.

Please provide feedback on this proposal by close of business 30 November by email to: veu@esc.vic.gov.au. We invite stakeholders to propose alternative evidentiary requirements to mitigate this risk.

² Please see example of this evidence in Appendix A



Clarification of current decommissioning and recycling requirements

The Building Based Lighting Upgrade Activity Guide states that all existing lighting equipment must be decommissioned and disposed of at recycling facilities in accordance with the VEET Regulations and EPA requirements. The VEET Regulations define lighting equipment as the following:

- lamps
- luminaires
- lighting control devices
- control gear.

We have updated table 13 of the guide to explicitly provide that evidence of decommissioning and recycling for this activity is required for all existing lighting equipment components. The amendment requirements are detailed in table 2 below.

Table 2: Evidence of decommissioning and recycling

Documentation	Description
Recycling invoice(s)	<ul style="list-style-type: none"> • Third-party recycling invoice(s) per upgrade site for all lighting equipment clearly showing the date of collection and: <ul style="list-style-type: none"> – For lamps: an itemised breakdown of the type of disposed baseline lamps³ – For all other lighting equipment: an itemised breakdown of the type of disposed baseline control gear and fittings/luminaires. <p>OR</p> <ul style="list-style-type: none"> • Third-party bulk recycling invoice(s) (for multiple upgrade sites) for all lighting equipment clearly showing the date of collection and: <ul style="list-style-type: none"> – For lamps: an itemised breakdown of the type of disposed baseline lamps – For all other lighting equipment: an itemised breakdown of the type of disposed baseline control gear and fittings/luminaires.

³ Where an itemised breakdown is not provided on the invoice, you must provide a document itemising the disposed baseline lighting equipment in kilograms for that site





The bulk recycling invoice(s) must be accompanied by a document itemising the disposed baseline lighting equipment in kilograms per upgrade site to establish a link between each upgrade and the recycling invoice(s).

Where to get help

If you have any questions or feedback with respect to matters set out in this program update, please contact VEU Support on (03) 9032 1310 or veu@esc.vic.gov.au.



Appendix A

Photo 1: Example of a geo-tagged photograph of the removed ballast boxes lined up in a row with the lamp holders facing up and in focus.

