

VEU water heating and space heating/cooling activities requirements

Submission received through Engage Victoria

Date submitted: 19 April 2023

Submitted by: Master Electricians Australia **Attachment:** Yes

From 6 April through to 24 April 2023 we invited submissions on the proposed changes to guidance materials, recordkeeping requirements and program forms relating to water heating and space heating and cooling activities.

Do you believe the information in the proposed decommissioning guidance material adequately sets out the steps and considerations for decommissioning a water heating product in a practical and safe manner? Does it align with industry best practice?

Yes, it is a thorough and clear document.

Are there other key decommissioning steps or information not captured in the guidance material and if so, what are they?

No

Do you have any comments on the proposed decommissioning record-keeping requirements for water heating activities? Do you consider the proposed decommissioning record-keeping requirements to be practical and achievable? If not, why?

No. MEA is concerned with the electrical aspect of this consultation only.

Do you have suggestions for alternative or additional forms of records that could be provided to verify that an existing water heating product has been decommissioned in a practical and safe manner so it cannot be used again?

No

Do you believe the information in the proposed decommissioning guidance material adequately sets out the steps and considerations for decommissioning a space heating and/or cooling product in a practical and safe manner? Does it align with industry best practice?

Yes, it is a thorough and clear document.

Are there other key decommissioning steps or information not captured in the guidance material and if so, what are they?

No.

Do you have any comments on the proposed decommissioning record-keeping requirements for space heating and cooling activities? Do you consider the proposed decommissioning record-keeping requirements to be practical and achievable? If not, why?

No comments.

Do you have suggestions for alternative or additional forms of records that could be provided to verify that an existing space heating and/or cooling product has been decommissioned in a practical and safe manner to ensure it cannot be re-used again?

No.

Do you have any comments on the proposed disposal record-keeping requirements for water heating activities? Do you consider the proposed disposal record-keeping requirements to be practical? If not, why?

No. MEA is concerned with the electrical aspect of this consultation only.

Do you have suggestions for alternative or additional forms of records that can be provided to verify that a decommissioned water heating product and associated waste and debris has been disposed of in accordance with all applicable waste management legislation?

No. MEA is concerned with the electrical aspect of this consultation only.

Do you have any comments on the proposed disposal record-keeping requirements for space heating and cooling activities? Do you consider the proposed disposal record-keeping requirements to be practical and achievable? If not, why?

MEA has no concerns about the disposal of refrigerant gas requirements, as this is covered under the ARCTIC licensing requirements. MEA has some concerns/questions about the process for e-waste and other debris. If the process allows for the recording/acquital of these waste products in a bulk manner, we would be in agreement (i.e. a docket for a quantity of e-waste/debris includes an identifier/invoice number of the decommissioned products). If the acquital of the e-waste/debris has to be done on a job-by-job basis, we believe that this would be an onerous requirement and significantly add to the administrative and physical burden of compliance. Contractors, would generally stockpile AC waste until there is a quantity big enough to deal with in an efficient manner to break down and sort for recycling, a requirement to deal with this waste individually would not be efficient or productive.

Do you have suggestions for alternative or additional forms of records that can be provided to verify that a decommissioned space heating and/or cooling product and associated waste and debris has been disposed of in accordance with all applicable waste management legislation?

Allowing for installers/decommissioners to deal with acquital of waste as a bulk lot, as long as there is an audit trail of invoice/job number on the docket for disposal.

Do you have any comments on the proposed refrigerant disposal record-keeping requirement for space heating and cooling activities involving the decommissioning of a product containing refrigerants? Do you consider the proposed disposal record-keeping requirement to be practical and achievable? If not, why?

Yes, it is inline with current refrigerant handling license requirements.

Do you have any comments on the proposed changes to the form for certificate creation and form for assignment of certificates for space heating and cooling activities to assist the commission to monitor compliance and risk of inappropriate sizing of products?

No comments, other than the feedback from members that question the value of the calculation for greenhouse savings, and cost savings being done by the installer. There is clear guidance on the sizing of space heating and cooling ACs provided and the eligible products that can be used, so why is it incumbent on the installer to take the extra step, spend extra time on the job, and give an "implied" guarantee on the savings of the unit that the installer cannot control, depending on how the homeowner uses the product or the integrity of the building envelope?

Do you have any comments or concerns on the proposed addition of two new fields to capture lead generation information in the forms for certificate creation for all water heating and space heating and cooling activities?

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MEA has fielded some concerns from members that being able to generate other legitimate work from an interaction with a customer for a VEU purpose, is viewed with immediate suspicion or concern by the administrators of the VEU program. Generating leads from customer interactions for work that will enhance the amenity or safety of the customer should be encouraged (i.e. smoke alarms, halogen downlights, safety switches, cracked switch plates etc, etc).