



## INSULATION COUNCIL OF AUSTRALIA AND NEW ZEALAND

Scheme Administrator  
Victorian Energy Efficiency Target Scheme  
Level 37  
2 Lonsdale Street  
Melbourne 3000

veet@esc.vic.gov.au

Dear Administrator

### **Consultation submission – VEET Insulation Administrative Requirements**

Installing ceiling insulation into existing homes is recognised in Australia and globally as the most cost effective measure that can be taken to reduce energy costs, reduce carbon emissions, improve comfort and protect health and well-being of household occupants. The inclusion of insulation in any government program designed to address these issues is widely accepted and expected. The immediate and long lasting benefits of properly installed insulation to households and the community collectively are strongly encouraged and supported by most Governments. This is particularly important for families with young children at home, the elderly, low income and otherwise disadvantaged households who struggle to pay their ever rising power bills.

ICANZ is therefore extremely disappointed with many of the administrative proposals in the Consultation Paper. ICANZ considers these administrative requirements to be excessive relative to the risk and wastefully expensive. It is likely to result in the total failure of the program to adopt insulation measures.

In our view the proposed administrative requirements unfairly discriminate against insulation.

Many other trades enter roof spaces in Victorian homes. No other activity or trade working in the same site conditions or risk environment is asked to comply with similar requirements. These include, for example:

- Airconditioning and heating system installers and services
- Hot water heater installers and services
- Termite inspectors
- Computer system installers
- Roof vent and skylight installers
- Attic ladder installers

ICANZ is unaware that any of these trades are required to engage an electrician to inspect the wiring in the roof space before and after installation. Instead they, and all other trades like insulation installers, are required to abide by Australian Standards and local workplace health and safety requirements, to adopt a duty of care by undertaking an appropriate risk assessment prior to entering the roof space.

In Australia over two hundred thousand homes and major renovations per annum requiring a building permit are insulated. With the exception of HIP 2009/10 we are unaware of any installer fatalities or major injuries occurring in Australia over the last sixty years. We have no record of any installer injuries from the past several insulation programs run by the Victorian Government or programs run by any other Australian jurisdiction. Similarly we can find no Worksafe incidence reports of installer injuries.

Despite this, since the closure of the VEET program in 2010, many of the risk and failures found in the Home Insulation Programme and singled out for attention by the Royal Commission, have been recognised as potential risks and have been successfully addressed in the reviews of Australian insulation installation Standards, VEET's current prerequisites and by the Insulation Industry's established and comprehensive



## INSULATION COUNCIL OF AUSTRALIA AND NEW ZEALAND

installer accreditation process. If the ESC believes these processes need strengthening further it would seem to ICANZ this should be done through the existing structures and resources to avoid adding excessive and unnecessary costs to the process.

We estimate the compliance costs to the AP to fulfil all the proposed requirements to have ceiling insulation installed will more than negate any net financial benefit generated from the VEECs available to householders. Added to this, the required multiple and scheduled site visits for each job will be a considerable burden and inconvenience to householders and we believe from experience will be most unpopular. There is every chance that if these administrative requirements are implemented in their present form they will effectively eliminate any demand for ceiling insulation through VEET.

Similarly, the content of the discussion paper leaves the reader with the impression that the ESC has little confidence that trained and accredited installers will do their jobs competently. Whereas ICANZ supports the introduction of inspection and auditing we believe this should be done on a regular and random basis. ECCA in New Zealand recently ran a home insulation program that included careful product selection and required installer training. This program had no major issues. Its administration was effective and non – invasive using a 10% audit regime. The VEET program is substantially smaller and should consider a similar approach.

Below are ICANZ comments on matters raised in the Consultation Paper

### 1. Installing insulation is High Risk Construction Work (HRCW)

Using the criteria outlined the Consultation Paper - Further information page 12.

- **Any** work occurring in an attic space would meet all/most of the criteria to be classified as HRCW (High Risk Construction Work).
- Measures to address exposure to any of these risks are all addressed in the current AS3999 and in Insulation Industry installer training program.
- It is unclear how an inspector can reclassify working in a ceiling cavity from 'high risk' to 'low risk'. The environment of working in an attic space will not change substantially following a risk assessment. Falling through a ceiling will remain possible; the temperature within a roof space will depend on the conditions on the day of installation (not 3 or more days prior) and conditions are far better assessed on the day by a trained and accredited installer.
- A mandatory requirement in AS 3999:2015 is for installers to turn off and lock off power on the day of installation and before entering the roof space and only re-energize the power after the installation is completed and checked. This would also be a requirement for pre and post inspection, causing further disruption to consumers.
- The latest review of Confined Spaces by Safework Australia 2015 (page 31, Appendix A – Confined Space Criteria) clearly states installing insulation in a roof cavity as NOT considered to be working in a confined space
- All the risks and hazards identified in the installer SWMS (which include the above and more) are best identified by installers on the day of installation will be addressed by appropriate installer practices pre, during and post installation.

### 2. (Q1) Appropriate installer training and qualifications.

- ICANZ supports the need for training and accreditation of all insulation installers which includes competing training units CPCCPB3027A (ceiling Insulation) and CPCCPB3014A (installing batt insulation products). ICANZ is involved in the current update of these two units.

- These and other units are included in the Insulation Industry's installer training course
- We believe the current training course content and established accreditation structure addresses all requirements needed for training insulation installers.



## INSULATION COUNCIL OF AUSTRALIA AND NEW ZEALAND

- Training reference material is updated in line with updates to Standards and regulations. The fourth update to the Insulation Handbook Part 2: Professional Installation Guide Version 4 was published in October 2016.
- The current accreditation process through the Clean Energy Council also includes a code of conduct, compliance and deregistration measures and the requirement for accredited installers to have a \$5 million public liability insurance cover.
- Accreditation is renewed yearly and this requires periodic proof that completed installation work meets compliance requirements.

### 3. (Q2) The necessity of a pre-insulation assessment by a Licenced Electrical inspector

A pre-installation inspection by an electrician 3 days prior to installation is unnecessary and in some ways impractical.

- On the day insulation is to be installed power to the premises is turned off and locked off before any installer enters the ceiling space. This is a requirement of AS 3999:2015 and also covered in theory and practice by installers training. Power to the premises is not re-energised until after the installer has done a final check of installed insulation and has physically left the ceiling space.
- Trained and accredited installers must complete a full SWMS their own risk assessment on the day of installation regardless of any prior assessment. Their assessment would include all items (and more) than is proposed for a VEET pre installation inspection.
- Installers are trained to look for exposed connections and deteriorating cables. If any of these are identified the installer would not proceed with installing insulation and would inform and advise the householder to contact an electrician to inspect the potential fault.
- As mentioned earlier the number of proposed site visits for insulation is excessive and onerous. Any opportunity to combine and reduce visits will reduce costs and reduce the invasiveness to householders.

It is ICANZ view that ESC should identify any elements of the installer inspection procedure they regard as not sufficient, and provide amendments to the installer training to cover these identified any shortfalls.

### 4. (Q3.) Random real-time inspections

Random real time inspections in practice will be difficult to organize in advance with APs or installers. The time taken to insulate an average ceiling can vary significantly from under 2 hours to over 4 hours depending on site conditions and co-ordinating installations on particularly new construction sites (non-VEET). On any given day an installer may have several jobs scheduled to complete and maybe delayed.

It would be administratively difficult and costly for an AP to reliably pinpoint a 2 hour installation time slot 3 days prior to an installation. These timeframes would need to be far more flexible to be practical.

### 5. (Q 4). Post Installation assessments

ICANZ supports the introduction of a post – installation inspection on a random basis and does not believe an electrician is necessary to perform this role.

- Using an electrician would further add unnecessary cost to the job and together with other added costs and complexities would remove any incentive to install insulation through the VEET program.
- When insulation has been installed according to AS 3999: 2015 most of the wiring will not be visible for an electrician to inspect unless the installed insulation was disturbed. Who would then be responsible for the quality of the job – the installer or the electrician?
- Provisions for installing insulation near recessed luminaires are clearly set out in AS 3999 (appendices A, B and C) and do not require a qualified electrician to view and verify this has been done in accordance with AS3999.



## INSULATION COUNCIL OF AUSTRALIA AND NEW ZEALAND

- We recommend an experienced and trained insulation supervisor would be more appropriate to conduct any post installation inspection.

For the Government VEET insulation to be successful for Victorian consumers, we would suggest the amendment of the proposed administrative requirements along lines outlined by ICANZ above.

Without these changes we consider the program will fail to deliver on the Government's objectives. This would be especially disappointing given the successful inclusion of insulation in other jurisdictions and under previous Victorian programs.

ICANZ recommends the ESC call a meeting of stakeholders with specific involvement in insulation and its effective installation to discuss concerns raised regarding the proposed new administrative requirements.

Yours Sincerely,

A handwritten signature in purple ink, appearing to read "Dennis D'Arcy", is written over a light blue circular stamp.

Dennis D'Arcy  
ICANZ CEO

### **About ICANZ**

The membership of Insulation Council of Australia and New Zealand (ICANZ) represents approximately 70% of insulation manufactured and used by the building industry. The Industry provides employment directly and indirectly to over 4000 people. All ICANZ members are affiliated internationally with their production technology and provide products that meet all required product and manufacturing standards.