

3<sup>rd</sup> February 2017

Scheme Administrator  
Victorian Energy Efficiency Target Scheme  
Level 37  
2 Lonsdale Street  
Melbourne 3000  
[veet@esc.vic.gov.au](mailto:veet@esc.vic.gov.au)

Dear Administrator

**RE: Consultation Submission – VEET Insulation Administrative Requirements.**

By way of introduction, Insulation Australasia is a product-agnostic insulation trade association representing insulation manufacturers, distributors and installer companies large and small across Australia.

The association's primary objectives are to:

1. Promote the cost effectiveness of insulation-based energy efficiency in Australian and New Zealand buildings in reducing carbon emissions
2. Create a sustainable industry platform to support increased employment opportunities and a profitable environment for investment
3. Promote increased insulation industry standards through 3rd party insulation product accreditation and the accreditation of insulation installers.

We thank the Essential Services Commission (ESC) for the opportunity to comment on the proposed administrative arrangements and unfortunately have to report our disappointed with many of the administrative proposals contained in the Consultation Paper.

Detailed below are some of our concerns:

**1. Qualification for VEET Subsidy**

The requirement for over 20 square metres of ceiling with no insulation will mean that there many houses that will be prevented from participating in the upgrading of their ceilings from lesser performing low levels of insulation to the current BCA required levels of insulation. The VEET website will also need to be clear on the requirements so that customer expectations are not raised causing problems to the AP and the reputation of the scheme.

**2. Installer Training and Certification**

Insulation Australasia supports the proposed certified training of installers in safety and the correct installation procedures. The industry already has in place adequate procedures for certification through the Clean Energy Council a competent accredited certifying body supported by the industry that should be utilised.

### **3. Pre Installation Inspection**

Insulation Australasia believes the proposed pre inspection requirement to be excessive and unnecessary. The use of an accredited electrician for a mandatory inspection burdens the householder with significant additional cost. Alternatively accredited insulation installers (the AP) are already skill in the identification of electrical hazards and are better placed to carry out such work cost effectively.

### **4. Random Inspections Inspection during installation**

Insulation Australasia supports in principle the inspection of installation in progress however we flag several issues with what is proposed that requires further industry consultation.

- Homeowners often require installer companies to notify them as to who is attending their home during the course of the install.
- The time frames proposed are for inspections are impractical as installations vary considerably in terms of completion times.
- With only accredited installers able to install insulation we believe that the proposed automatic reporting to Worksafe and ESC of faults or safety concerns should be a last resort rather than an explicit requirement. The accredited installers should be contacted by inspectors and given an opportunity to explain and rectify identified problems first.

### **5. Post Installation Assessments:**

Insulation Australasia supports in principle the post inspection of installations however disagrees with the approach proposed.

The current industry training scheme operated through the Clean Energy Council requires installers to conduct post installation inspections to identifying any problems caused by their install and procedures are in place to inform customers of any potential problems and to advise if an electrical contractor should be informed.

The proposed requirement for a licensed electrician to carry out this task would further burden the home owner with unnecessary cost and complexities and remove with it the incentive to install insulation.

**CONCLUSION:**

The proposed administrative arrangements are complex and costly to both the home owner and accredited person.

Insulation remains the most cost effective means of improving house hold insulation yet the proposed procedures will burden the homeowner with such additional cost and uncertainty that they are likely not going to take up the offer of improving the insulation of their building envelope leaving it considerably more energy in-efficient.

Taking note of the comments above Insulation Australasia strongly recommends further consultation with the insulation industry to review and simplify the proposed procedures.

Yours Sincerely,



Scott Gibson  
**Chairman**