

Date 3/11/2024

Review of administrative requirements for water heating and space heating and cooling activities

Ecovantage welcomes the opportunity to comment on the Review of administrative requirements for water heating and space heating and cooling activities

About Ecovantage

Ecovantage was established in 2007 to support businesses and households to reduce energy use and contribute to the fight against climate change through a reduction in emissions. We work within the energy efficiency schemes in New South Wales, Victoria, South Australia and Queensland as well as the national Renewable Energy Target scheme to help businesses and households access incentives for energy efficiency upgrades..

Please see our responses to the review questions below:

Consultation questions:

Question relating to proposed changes to decommissioning guidance and decommissioning and disposal record-keeping requirements

1. Do you have any feedback on the proposed decommissioning guidance for water heating and space heating and cooling activities? Do you consider the guidance to be practical and achievable? If not, why?

Overall the proposed guidance is positive. It is vital however for the Commission to provide further guidance on:

1. On what steps installers should take to seal air outlets of old ducting systems, taking into consideration the expense for patching, simple and easy steps would be the preferred outcome.

2. What evidence an accredited person should provide for justification where a product is not removed that would satisfy the commission.
3. Photo examples of seal and/or cap off the gas piping using appropriate materials in accordance with AS/NZS 501.1

2. Do you have suggestions for alternative steps installers should be taking to decommission water heating and/or space heating and cooling products?

Damage beyond repair where unable to remove.

3. Do you have feedback on the proposed geo-tagged photograph records that accredited persons must collect and maintain to evidence the decommissioning of water heating and/or space heating and cooling products? Do you consider the requirements to be practical and achievable? If not, why?

We consider the photo requirements to be reasonable and achievable for the installers to collect and provide to accredited persons.

4. Do you have suggestions for alternative or additional forms of records that could be provided to verify the decommissioning of water heating and/or space heating and cooling products?

No suggestions other than to have maximum clarity in regards to wording to leave no room for confusion or misunderstanding.

5. Do you have feedback on the proposed removal of proposed records that accredited persons must collect to evidence the disposal of water heating and/or space heating and cooling products in compliance with the EP Act and its regulations?

The proposed changes remove current difficulties that are being experienced in the collection of recycling records to be provided within the current activity to create certificates. We believe this change will be well received amongst installers experiencing difficulties to comply with the current disposal record requirements.

Questions relating to proposed record-keeping requirements for product sizing and the pricing of upgrades

6. Do you have any feedback on the proposed record-keeping requirements for space heating and cooling activity in relation to appropriate sizing of products? Do you consider the requirements to be practical and achievable? If not, why?

Yes. However it may take some time for the process to be perfected, the ESC needs to take this into account.

7. Do you have suggestions for alternative or additional forms of records that could be provided to evidence that products installed have been appropriately sized to meet the heating and cooling needs of the consumer having regard to the consumer's premises?

No suggestions.

8. Do you have any feedback on the proposed record-keeping requirements for the space heating and cooling activity in relation to the pricing of upgrades? Do you consider the requirements to be practical and achievable? If not, why?

As we've experienced this already being provided by some of our Scheme Partners we consider this requirement to be practical and achievable.

Questions relating to replacement of existing gas heating ductwork issue

9. Do you have a position on whether installers should be required to replace existing gas ductwork when upgrading from a ducted gas heater to ducted RCAC under the VEU program?

It would depend on the quality of the Ductwork. It might be difficult to judge consistently.

10. Are you familiar with these "easy replacement" ducted RCAC products that are being marketed as being suitable for connection to existing gas ductwork? Do you have views on whether such products should be able to be installed under the VEU program using existing gas ductwork?

We are familiar, and would imagine that more certificates would be allocated where ductwork is replaced due to greater efficiency. Or perhaps only apply to more recently installed baselines.

Kind Regards,

Nancy Coustley

Nancy Coustley

National Compliance Manager