

Date 24/4/2023

Department of Energy, Environment and Climate Action
8 Nicholson street,
East Melbourne, 3002

Consultation on Water & Space Heating activities changes

Ecovantage welcomes the opportunity to comment on the proposed changes to the Water & Space Heating activities for VEU Program.

We are broadly supportive of introducing strong evidentiary requirements to ensure that the existing units are removed and disposed of appropriately, however, we believe that some of the proposed evidence requirements are not practical or realistic and will be difficult to obtain in the real life scenario. We suggest ESC to consult with the Airconditioning and plumbing industry to have a better understanding of the general operations and practice in the industry rather than an ideal scenario which is not practical and operational.

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.

With dedicated teams who are trained and experienced in their roles we offer turn key solutions for our clients that include: Solar & Batteries, Energy Brokering, Tariff optimisation, Hot water upgrades, LED Lighting upgrades, Street lighting installation, Power factor correction. We believe that the Evaporative Cooler Activity will be yet another of the solutions that will be considered for our clients.

Consultation questions:

Proposed decommissioning guidance and decommissioning record-keeping requirements for water heating activities

1. 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?

EV Response: Please see answers to Question 3.

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

EV Response: None.

3. 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?

EV Response:

- I. The requirement to add the brand and model of the decommissioned product to the VBA certificate is excessive considering that this information is captured already elsewhere, such as in the geotagged photo of the existing unit nameplate. This is an unnecessary duplication of information and/or evidence, and excessive burden on plumber/electrician. We suggest that this requirement be removed.
- II. The intention behind the proposed photo requirement *'the removed product located next to the surface to which it was previously attached showing the condition of the surface following completion of the upgrade (where the existing product is removed)'* is unclear. We believe that it will be difficult to comply with this requirement as if taken *'following completion of the upgrade'* then the surface condition will no longer be visible as it will be covered by the new product. Additionally, leaving the unit next to the installed unit does not leave enough work space for the installer and they need to move it away and bring it back for the purpose of the photographic evidence.
- III. In addition to the above point, the expectation to *'patch up'* or plaster up any holes that might be left by the removal of a unit is unrealistic - especially given

the cost involved with doing so. Whilst there should be an expectation that installers and end-users reach an agreement prior to the installation as to whether the unit is removed from the property or remain decommissioned and in place, the expectation should not be that installers must make repairs to any spaces where units have been removed. This would add considerable costs to the installation that are not catered for in the modelling provided by the ESC.

- 4. 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?**

EV Response: To ensure unit has been decommissioned and removed from site we suggest a geotagged photo showing the baseline unit has been removed from its existing location onsite /or in the back of the work vehicle. We have employed this in NSW as an extra level of compliance adherence to positive effect.

Proposed decommissioning guidance and decommissioning record-keeping requirements for space heating and cooling activities

- 5. 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?**

EV Response: Please see answer to question 7.

- 6. Are there other key decommissioning steps or information not captured in the guidance material? If so, what are they?**

EV Response: None.

- 7. 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?**

EV Response:

- I. The requirement to add the brand and model of the decommissioned product to the VBA certificate is excessive considering that this information is captured already elsewhere, such as in the geotagged photo of the nameplate. This is an unnecessary duplication of information and/or evidence. We suggest that this requirement be removed.
- II. The intention behind the proposed photo requirement 'the removed product located next to the surface to which it was previously attached showing the

condition of the surface following completion of the upgrade (where the existing product is removed)” is unclear. We believe that it will be difficult to comply with this requirement as If taken ‘following completion of the upgrade’ then the surface condition will no longer be visible as it will be covered by the new product. Additionally, leaving the unit next to the installed room does not leave enough work space for the installer and they need to move it away and bring it back for the purpose of the photographic evidence.

- III. In addition to the above point, the expectation to ‘patch up’ or plaster up any holes that might be left by the removal of a unit is unrealistic - especially given the cost involved with doing so. Whilst there should be an expectation that installers and end-users reach an agreement prior to the installation as to whether the unit is removed from the property or remain decommissioned and in place, the expectation should not be that installers must make repairs to any spaces where units have been removed. This would add considerable costs to the installation that are not catered for in the modelling provided by the ESC.

8. 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 so it cannot be reused again?

EV Response: To ensure unit has been removed from site we suggest a photo showing the baseline unit has been removed from its existing location onsite or in the back of the work vehicle. We have employed this in NSW as an extra level of compliance adherence to positive effect.

Proposed disposal record-keeping requirements for water heating activities

9. 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?

EV Response: Ecovantage has a large operation for the installation of hot water system across NSW, VIC and SA and works closely with multiple service providers, in our experience all HP units are disposed in bulk and therefore it is impossible to provide a disposal receipt per job. This will create operational challenge and additional cost to the installation.

While there is already a declaration for installer for decommissioning and disposal we suggest to strengthen the wording for installer to confirm that they will dispose the unit appropriately and lawfully.

Additionally, ESC should expect the APs to maintain a process and agreement with their service providers that they will dispose of the units appropriately and maintain an auditable record of bulk disposal.

10. 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?

EV Response: Update the declaration for the installer on the Assignment Form to include that they confirm that they will dispose of the decommissioned unit at a Lawful place according to the VEU requirement and will maintain an auditable record.

Proposed disposal record-keeping requirements for space heating and cooling activities

11. 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?

EV Response: Ecovantage has a large operation for Airconditioning activities across NSW and SA and works closely with air conditioning companies, in our experience companies with established and larger operations dispose the removed units in bulk few times a year. This may even include dismantling the units in different parts before they can recycle each category accordingly and therefore it is impossible to provide a disposal receipt per job. This will create operational challenges and additional cost to the installation and will be a barrier for the uptake of the activity.

While there is already a declaration for installer for decommissioning and disposal we suggest strengthening the wording for installer to confirm that they will dispose of the unit appropriately and lawfully.

Additionally ESC should expect the APs to maintain a process and agreement with their service providers that they will dispose of the units appropriately and maintain an auditable record of bulk disposal.

- 12. 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?**

EV Response: Update the declaration for the installer on the Assignment Form to include that they confirm that they will dispose of the decommissioned unit at a Lawful place according to the VEU requirement and will maintain an auditable record.

Proposed refrigerant recovery and disposal record-keeping requirement for space heating and cooling activities

- 13. 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?**

EV Response: In our experience the current practice amongst all air conditioning companies is to decommission the gas into a container and once the container is full, they recycle the gas appropriately. There may be cases that the removed gas may be used for other purposes by the qualified refrigerant handling mechanic, therefore, it is impossible to obtain receipts on an individual job basis, nor immediately after. Additionally, it will be impossible to reconcile the recycling receipts against individual jobs, therefore, we propose requiring an additional declaration for each job signed by the refrigerant mechanic confirming that he will dispose of the removed gas appropriately and they must retain the auditable record of the disposal.

Proposed sizing record-keeping requirement for water heating activities

- 14. Do you have any comments on the proposed changes to the forms for certificate creation and forms for assignment of certificates for water heating activities to assist the commission to monitor compliance and risk of inappropriate sizing of products?**

EV Response: 'Details of the decommissioned product(s)' on Assignment Form - this needs to be more clear. How much detail does this mean? If just the type of product it is acceptable, but if more - i.e. brand and model numbers - then it seems like an unnecessary addition of information to that which is already gathered as part of the photographic evidence.

Proposed sizing record-keeping requirement for space heating and cooling activities

15. 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?

EV Response: 'Details of the decommissioned product(s)' on Assignment Form - this needs to be more clear. How much detail does this mean? If just the type of product it is acceptable, but if more - i.e. brand and model numbers - then it seems like an unnecessary addition of information to that already gathered as part of the photographic evidence.

Proposed lead generation record-keeping requirements for water heating activities and space heating and cooling activities

16. 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?

EV Response: None.

Additional Issues:

We would like to add another few points, not addressed in the consultation paper, concerning;

1) Product registrations

Ecovantage supports the VEU's decision to establish their own product registry to ensure that upgrade products meet the minimum efficiency requirements and, therefore, realise the energy savings projected in the activity rule.

However, we strongly encourage the ESC to reconsider the decision to require a product application submission for every product to be entered into the registry.

This will not only create an unnecessarily burdensome workload for VEU administration staff given the breadth and depth of air conditioning products in the marketplace but also create a narrow pool of eligible upgrade products in the short-to-medium term.

In limiting the number of eligible upgrade products, the industry will inevitably experience significant delays in the delivery of upgrades due to stock shortages. This may also be exacerbated by the large number of product applications the VEU is likely to receive in a short period of time, which could likely lead to lengthy wait times for product approval.

For these reasons, we would encourage the ESC to consider adopting the same approach as IPART under the Home Energy Efficiency Retrofits scheme in NSW. As long as a product is registered on GEMS, it is an eligible product but the efficiency requirements determine the certificate calculations and, therefore, the overall rebate value.

2) Space Heating and Cooling - Building age- 2 year requirement - can we please confirm whether this requirement needs to be verified in compliance (i.e. checking on Nearmaps or some other required evidence) or will the installer/assessor confirmation/declaration be sufficient?

3) Space Heating and Cooling - installer certification requirements

Please clarify the refrigerant handling licensing requirements and limitations for installers under the proposed Activity 6.

Kind Regards

Mahsa Sistani
National Operations and Compliance Manager