

VEU water heating and space heating/cooling activities requirements

Submission received through Engage Victoria

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Submitted by: Anonymous

Attachment: No

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 space heating and/or cooling product in a practical and safe manner? Does it align with industry best practice?

No, it does not align with industry. In the documentation there is a decommission photo required showing 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)”. When this was asked in the consultation webinar what this photo was for, we were told it was to show that the area had been “made good”, meaning fixed and repaired. The industry standard is for the household to engage their own tradespeople to complete the make good, as some like to do it themselves, have friends or family that can complete or have their own tradespeople. Regardless, this is not legislated for the VEECs creation for space heating and cooling and has nothing to do with the compliance of the installation. In fact, it is not a requirement in the current space and heating and cooling activities. The reason given in the meeting was to make sure the householder was happy and would not complain. This is currently achieved in the industry with good communication to ensure the householder is aware that ‘make-good’ is not included in the decommissioning and installation, whilst also giving them the option of completing themselves. If it is required that make-good be completed by the installers, the cost would far outweigh the benefits of creating the VEECs in the first place. Any installer creating certificates would then be uncompetitive with the industry standard and create an unnecessary barrier to create VEECs for this activity. In addition, it would create 1) additional health and safety risk, 2) logistical nightmare and 3) delay VEEC creation further, which is even longer before the AP could be recoup the money for the VEECs. The installer currently removes the old unit from the premises and places safely in their vehicle, creating a safer workspace. They then complete the new installation. If a photo was required as per above, they would need to return to site with the old unit, possibly several weeks later, once the plasterer and painter have finished. Then bring the old back unit inside to take the photo. The cost to do this would far outweigh the VEECs and be logistically impossible. In addition, the VEECs would be delayed even further after the installation causing even more costs to the AP. This requirement would kill this activity for any replacements.

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?

As per above not practical to take a photo of 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). Regardless of our comments above regarding make good issues. It is an additional health and safety risk to be moving the old unit out, securing in their vehicle, then moving the old unit back inside, once the installation has been completed, simply to take a photo. This photo is not required. Already there is a photo of the pre-installation area including the old unit, the decommissioned unit and the new unit installed product.