

Dear VEU Team,

Thank you for sending the consultation on proposed amendments to requirements for water heating activity (activities 1 and 3) and space heating and cooling activity (activity 6).

please find below iPromise Australia's Feedback as Accredited Person:

1. Decommissioning Requirements

- We appreciate the added clarity in decommissioning steps, especially the guidance to seal and cap gas connections according to AS/NZS 5601.1 standards. This makes it straightforward for installers to understand exactly what's required, which helps protect consumers and the environment.
- Specifying that products left on-site should be rendered permanently unusable is a positive step. Disabling elements like control boards or damaging tanks reduces the risk of these products being reused improperly, helping maintain program integrity.

2. Record-Keeping Requirements

- The requirement to include geo-tagged photos in documentation is practical and manageable. This change ensures there's a clear record of compliance while streamlining the process.
- Allowing geo-tagged photos as an alternative to waste receipts is a helpful adjustment, especially for installers who may have trouble obtaining detailed receipts in batch disposal situations. This flexibility makes compliance easier without compromising documentation standards.

Feedback on Sizing and Pricing Record-Keeping Requirements

1. Product Sizing Records

- Requiring records that document room sizes and the heating or cooling capacity for installations helps ensure that products meet consumer needs. While valuable, this adds a bit of complexity to documentation, so providing templates or examples of acceptable records would make this easier for participants to manage.
- Including consumer signatures on sizing records is a practical approach, adding transparency by ensuring consumers are well-informed on the system they're receiving.

2. Pricing Transparency

- Adding fields to capture costs (both pre- and post-VEEC incentives) is a good addition. This added transparency supports consumer protection and helps manage the risks of overcharging in the program.

Feedback on Replacement of Existing Ductwork

- Requiring ductwork replacement when upgrading to ducted RCAC systems is essential for system efficiency and consumer satisfaction. Old ductwork often isn't suitable for newer systems, and replacing it helps avoid performance issues and additional costs for consumers down the line.
- For products marketed as "easy replacements" compatible with existing ductwork, we recommend to still replacing it helps avoid performance issues and additional costs for consumers in the long run.

These proposed changes are solid steps toward maintaining program integrity and protecting consumers. Providing more templates or specific guidance for the record-keeping requirements would ease the compliance process, making it more practical for all scheme participant to meet the new standards.