

VEET Scheme Administrator

Essential Services Commission Victoria

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EECCA Submission – Insulation, Dec ‘16

It is with some degree of disappointment that we read VEET Insulation Administrative Requirements 20161206.

EECCA believes that insulation should be encouraged under the scheme as it is in SA. As much of Australia is subject to climate extremes, insulated houses provide a more comfortable, safe and energy efficient living situation. Every year many people die from heat stress and a well insulated house would potentially reduce this unfortunate situation significantly. The VEET scheme has the potential provide this encouragement and yet the requirements as proposed will be unlikely to do that in their current form.

Whilst the requirement for installers and supervisors to undertake specific training related to insulation is appropriate, the concept of a pre-installation assessment by an electrician (in particular an LEI) appears to be an overreach.

If an assessment for safety is deemed necessary, then training should be provided for the insulation installers to identify potential hazards. The cost of engaging LEI electricians to undertake a pre-assessment will add a significant cost and level of difficulty to the activity.

Houses are being insulated currently in Victoria without an electrician performing a pre assessment and signing off on safety. The VEET scheme would simply further encourage the activity and would make it available to low income households. Is there any evidence that current activity is unsafe or that the VEET scheme would necessarily follow and present the same issues as the federal scheme?

EECCA recommends that hazard identification be included in the training modules rather than the use of an electrician. Whilst the commission are enforcing training of installers, we believe that the installer companies need to be allowed to install compliantly according to the training. If the training is not deemed to be appropriate, then this issue needs to be addressed.

The requirement for a 3 day buffer will also complicate the installation process where the householder needs to be home and available multiple times. The inconvenience and additional costs associated with rescheduling will also add costs to this activity. It is not clear what benefit this buffer will provide to the householder.

Real time inspections by commission staff is also an overreach. Whilst we encourage commission staff to undertake random inspections, the difficulty in organising the inspections to coincide with the installation will be administratively difficult and costly.

The current requirements followed by insulation companies where they complete safety documents and a supervisor inspects the work has been a significant step up in safety requirements in recent years and has proven successful. This approach is supported by the SA REES scheme.

If the fear is that the certificate value will be over-stimulating insulation activity in the same way as the federal scheme did, then apply a requirement for co-payment similar to the REES.

The requirement for a post installation assessment to be performed again by an electrician is ill advised as the electrician will no longer be able to see much of the wiring and will again be reluctant to signoff wiring that they did not install. A post install assessment should be performed by the insulation supervisor and the commission should undertake a random number.

We believe that the requirements as suggested are extreme and illustrate a lack of understanding of the insulation installation process. We wonder whether the insulation industry has been involved in the design of these requirements and whether the tightening of safety requirements delivered since the Pink Batts fiasco has been considered.

How many problems have there actually been since the tightening of requirements?

On a different but related matter, we believe the consultation paper is poorly constructed and does not encourage stakeholder engagement at all.

We believe that the wording of the consultation “questions” is misleading where a heavily biased statement precedes a soft question. We question the basis of the statements. I.e. A post-installation assessment is a necessary measure to assess that the installation has satisfied all activity requirements and will not constitute a safety, electrical or fire hazard.

Upon what basis is it deemed necessary?

Who made this decision?

Why isn't it set up as a question rather than a statement?

The statement toward the end of the document Again shows the bias and takes an unarguable high ground.

“The HIP RC identified failings in a number of areas associated with administration of a program that involved the installation of insulation. This experience has demonstrated that the processes and procedures to properly monitor, police and regulate insulation installation undertaken under the VEET scheme must be rigorous and robust. They must ensure the safety of insulation installers, householders and the general public, the quality of installations, and assist in confirming that the correct level of abatement required by the Regulations has been achieved.”

The assumption that the preceding measures are specifically designed to deliver this outcome makes arguing against them difficult and potentially emotive.

The paper should instead lead with this statement as a requirement and then consider measures to achieve it, instead of stating the measures and providing the statement as if it necessarily follows.

EECCA believe that the ESC has overreached and such requirements, if implemented, will cripple the activity with unnecessary administrative burden. We believe there are alternatives but this paper does not fairly allow for the discussion let alone reasonable consideration. Without significant change to the requirements as presented, the installation of insulation will be unlikely to be supported by the VEET.

EECCA suggests the ESC retract this paper and enter into a new dialogue with the insulation industry and other stakeholders that will be more constructive. We also recommend that such papers in the future are presented in a manner that encourages consultation.

Thank you

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EECCA Insulation Working Group