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To: <veet@esc.vic.gov.au>
Date: 02/02/2017 12:26 AM
Subject: Consultation submission - VEET Insulation Administrative Requirements

Response to consultation submission – VEET Insulation

Submission questions responses below.

General Comments:

- Is it possible for someone to reply to us to clarify the requirement that VEECs can only be created for insulation installed to an area that is uninsulated (> 20m²). This needs to be made VERY clear to minimize any confusion to APs and installers. What is “Evidence of previous insulation”. What if this is just a few remnants of old blow-in insulation that was removed by someone at some stage.
- The submission states “*mandatory safety training (MST) units of competency before being approved to undertake these activities*”. Installers with the CEC accreditation should be automatically approved as competent.

Consultation question 1:

In light of our objective to ensure that VEET insulation installers hold appropriate training and qualifications, does the above list of installer certification program characteristics require the addition or removal of any items?

An installer certification program is likely to include the following characteristics:

- *training and competency requirements (including the reviewed versions of the units CPCCPB3027A and CPCCPB3014A)*
- *a specified level of Public Liability Insurance*
- *a framework for assessing previous insulation installation experience, and*
- *binding terms and conditions and codes of conduct.*

Ecomad Response:

- Agree that all installers need to be trained on how insulation should be installed according to Australian Standards as well as training in appropriate OHS.
- Agree with specified level of PL insurance
- Item re framework for assessing previous insulation installation experience. Does this mean the ESC assumes that the insulation installer needs to have been in, or is currently in the insulation installing field? New installers with all the required course training may not yet have previous experience installing insulation – framework would need to include new installers as the industry sees a high turnover of insulation installers.
- Agree there should be a code of conduct that should be signed by all insulation installers

What needs to be added

1. Training that covers electrical safety eg how to identify electrical wiring risks to persons working in a roof-space.
2. A clause for any insulation installers that have the “Very New” – Clean Energy Council insulation installers accreditation. This accreditation would cover all of the items mentioned above. If insulation installers are CEC accredited, then does the ESC need to only provide a framework to assess previous installation experience for those installers who don’t have CEC accreditation. CEC accreditation is not mandatory, and many existing insulation companies will not require their installers to have this accreditation. Currently only tenders to the Vic State Gov’t and Federal Gov’t that include insulation installation require CEC accreditation.

Consultation question 2:

A pre-installation assessment is a necessary measure to ensure that a potential work environment is low risk. Are there any additional pre-installation measures that should be implemented to ensure the health and safety of installers and householders?

Ecomad Response:

Some questions about the pre-assessment:

- Does the department require an LEI to inspect roof electricians ONLY or is the requirement for them to provide a full SWMS as well to the ESC for compliance? The LEI should only be advising RISK with regard to electricians ONLY. It is up to the insulation installers to conduct a SWMS for everything other than electric that may affect health and safety.

This should be a 4 part process where”

1. The insulation installer needs to conduct a site visit in order to provide an accurate quote. At this time they can conduct a swms as it will affect them (insulation installers) directly. Photos should be taken (with time/date and GPS coordinates) by installer conducting initial site visit.
2. An LEI does a pre inspection of the electricians in the roof-space that will impact the insulation installers. The findings would go to the insulation installers to include in their pre-swms. And is this only the area that is uninsulated
3. On day of job, the a swms check is made by the insulation installers to ensure no conditions originally sited have changed.
4. Installers take photos of the newly insulated area once job has been completed (with time/date and GPS coordinates) to be held on file and provided to ESC for auditing purposes if required.

There should be no other pre-installation measures required if a certified SWMS has been carried out – this should identify all the risks – along with an LEI report.

- Something NOT clear in the submission is what the VEET compliance is actually covering. For example, if 40m² of a roof-space is un-insulated, the VEECs would only be applied to this 40m². So does the LEI only look at this area? What if the remaining roof-space (say 70m²) has a layer of insulation that needs to be topped up. This doesn’t attract VEECs, but the same insulation installers can quote to insulate the entire roof to meet the required minimum levels. When an LEI comes back for Post Inspection, are they only going to inspect the 40m² area that has new insulation? What happens if they happen to find an issue in the 70m² of roof-space where insulation has been topped up? Assumption here is

that this would not affect VEEC creation if the 40m2 uninsulated complies?
(PLEASE CLARIFY)

Consultation question 3:

Are the proposed random, real-time inspections of VEET insulation installations the most efficient and effective means to ensure that safe work practices and activity requirements are being followed by APs and installers?

Random real time inspections would be the main means of ensuring correct work practices. Whether this is efficient or not depends on how many random inspections will be conducted per installer business and how many resources are required to conduct the random inspections. It mentions that perhaps 2 persons (one a Commission staff member) will conduct the inspections. Does a Commission staff member need to be used (all the time). Surely the competent professional can do the inspection in most cases.

Consultation question 4:

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. Are there any additional post-installation measures that should be implemented to ensure the health and safety of householders?

No additional post-installation measures required.

Chris Johnson – Director

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