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To: veet@esc.vic.gov.au
Date: 13/12/2016 10:29 AM
Subject: Consultation submission VEET insulation Administrative requirements

Submission by Andrew Arblaster on behalf of Enviroflex Insulation

Victorian Energy Efficiency Target Scheme _ Insulation Administrative Requirements.

Installer training and safety

The insulation industry is working closely with Artibus to expedite the review of the units of competency CPCCPB3027A and CPCCPB3014A and the target of 2016/2017 year is achievable.

Consultation question 1 Certification

Agree with commission approach and the procedures

Certification is important in selecting appropriate installation companies as noted the other procedures are common to all VEET activities.

No additions or deletions are recommended

Consultation question 2 pre inspection

Agree that pre-insulation inspection is required.

The other major hazard that is often met in retrofitting insulation is asbestos and this should, as far as practical, be identified prior to installers arriving at site. This should be part of the AP procedure and where appropriate should be included in the LEI report. Electrical inspectors are very aware of these issues.

Consultation Question 3 Real Time Inspections

Agree with the random real time inspections

I believe there should be a review process with the AP prior to reporting to ESV or Worksafe.

If there is an "immediate risk" to health and safety of any of the stakeholders, work should cease immediately and AP and householder advised.

Commission representatives and professional(s) are to meet with AP to resolve issue, and if not resolved, it may be reported to ESV and Worksafe as appropriate.

AP's having completed the assessment process and the installers having completed the training program required it is unlikely that issues will arise but if they do there should be a mechanism to resolve before escalation to safety regulators.

Consultation Question 4 Post Inspections

Agree with the post inspections.

Again if there is an "Immediate risk" to the stakeholders the LEI should "make safe" at AP expense and AP should be responsible for implementing rectification action within a reasonable time.

Commission to meet with AP to resolve issue, and if not resolved, then it is reported to ESV or Worksafe as appropriate.

An LEI will be able to provide a report on the Electrical safety act and presumably the gas safety act.

Is it proposed that the AP self-report on compliance with the OH&S act and building act and AS 3999: 2015 or that another professional(s) be appointed to inspect?

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