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THE RESPONSE OF ENERGY SAFE VICTORIA TO THE VICTORIAN ENERGY EFFICIENCY TARGET SCHEME – INSULATION ADMINISTRATIVE REQUIREMENTS CONSULTATION PAPER

On 6 December 2016 the Essential Services Commission invited Energy Safe Victoria (ESV) to provide any further comments it may have on the Victorian Energy Efficiency Target (VEET) Scheme for insulation.

The responses of ESV to the consultation questions follow:

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?

ESV Response The installer certification program may require the inclusion of the following characteristics as minimum training requirements:

- Construction induction course
- Working at heights training
- Installer company induction and authorisation.

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?

ESV Response ESV is of the view that the pre-installation assessment should be mandatory. ESV is unable to propose any additional pre-installation measures until a developed pre-installation assessment is available for review of its structure, content and compliance.

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?

ESV Response ESV agrees that real-time inspections of VEET insulation installations have merit. These inspections are a valuable tool to ensure compliance of the installer and the installation. The question of how these inspections are to be funded has to be addressed.

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?

ESV Response ESV believes that a post-installation assessment is essential. ESV is unable to propose any additional post-installation measures until a developed post-installation assessment is available for review of its structure, content and compliance.

In addition to the specific consultation questions, the ESC invited further comments. The further comments of ESV are:

- The consultation paper addresses the minimum insulation administrative requirements for accredited installer qualifications and training. However, the consultation paper does not address any minimum administrative and training requirements for the insulation installation companies and/or employers of insulation installers.
- The mandatory HSEQ requirements are addressed in Occupational Health and Safety legislation. However, these requirements need to be identified in an insulation installer's administration system to demonstrate compliance to Regulators and the community.
- The consultation paper does not explain why a Licensed Electrical Inspector (LEI) is required to perform the pre-installation and post-installation inspection. There may be insufficient LEIs in Victoria, so an alternative may be required. This could be addressed through requiring a Registered Electrical Contractor or a Licensed Electrical Installation Worker to complete an approved course of training to identify and manage the hazards and risks associated with the installation and inspection of insulation in existing installations.
- The consultation paper does not identify inspection minimum requirements for the pre-installation, real time and post-installation inspections of premises destined for insulation installation. These minimum inspection requirements would need to be developed and consultation undertaken to ensure these requirements ensure the delivery of legal obligations.
- The paper does not address what percentage of installations are to be subject to real time inspections.
- The consultation paper does not address what administrative, control and enforcement measures are proposed where an insulation installer or insulation installation company does not comply with applicable legislation, Australian Standards, mandatory training or HSEQ requirements.

- ESV regulates the safety of electrical installations; it has no role in the areas of dispute resolution or arbitration, the safety of premises, inspection of premises and the enforcement of matters other than compliance with the Electricity Safety Act 1998 and the Electricity Safety (Installations) Regulations.

I trust this feedback proves useful in moving matters forward.

Yours sincerely



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ELECTRICAL SAFETY AND TECHNICAL REGULATION