

3rd February 2017

Scheme Administrator
Victorian Energy Efficiency Target Scheme
Level 37, 2 Lonsdale Road
Melbourne, VIC 3000

RE: Consultation Submission – VEET Insulation Administrative Requirements

Dear Administrator,

Thank you for the opportunity for Fletcher Insulation to review the VEET Scheme - Insulation Administrative Requirements Consultation Paper. Upon review, Fletcher Insulation is disappointed with many aspects of the proposal. We have outlined a few points below.

Installer Training

Fletcher Insulation strongly advocates that all insulation installers are trained and go through an accreditation process, where in fact, if the installer fails to meet installation standards, they can receive demerit points and ultimately lose their accreditation if they persist with bad habits. Please refer to Clean Energy Council, who already has an insulation installation accreditation scheme.

Pre-Installation Assessment

A pre-installation assessment by a licensed electrician is impractical, costly to an AP and deemed unnecessary. In fact, any benefits of this scheme will be lost. In our experience, it is common that electricians are not in favour of signing off or certifying electrical work carried out by a third party. It is also a big inconvenience to the homeowner as this proposal suggests the requirement of numerous visits which is a huge inconvenience to any household.

Real-Time Inspections

The concept of real-time inspections sounds great. However, in our experience this is not practical. Random inspections are an inconvenience to homeowners who like to know who is coming to their home and when, whilst the installation work is being undertaken. Installers have numerous sites to visit in a day to carry out their insulation installation. Their schedule can change on the day or within a very short time frame. Therefore trying to organise random inspections is very difficult and also very costly.

Post-Installation Assessment

Similarly to pre-installation assessment, the need for a licensed electrician for the post-installation assessment is highly impractical as most of the wiring will not be visible and they will be reluctant to sign off or certify electrical work carried out by a third party.

Overall, the proposal is very multifaceted and expensive for the AP. There are additional costs, inconvenience to the homeowner and time delays associated with every aspect of the process. By using an accredited installer it mitigates the need of a licensed electrician, which saves money, time and is more practical.

We suggest that this consultation paper is rescinded and instead there is engagement with the insulation industry so that a fair, simple and constructive proposal can be put together with the consensus of a working group from different aspects of the insulation industry whether it is manufacturers or representatives from industry associations.

Yours faithfully,

Mukesh Desai