



VICTORIAN ENERGY EFFICIENCY TARGET SCHEME – INSULATION ADMINISTRATIVE REQUIREMENTS

CONSULTATION PAPER

DECEMBER 2016



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PREFACE

The Victorian Energy Efficiency Target (VEET) scheme is a Victorian Government initiative promoted to the community as the *Energy Saver Incentive*. It was established under the *Victorian Energy Efficiency Target Act 2007* (the Act) and commenced on 1 January 2009. The purpose of the scheme is to promote reductions in greenhouse gas emissions by encouraging efficient use of electricity and gas in the residential and commercial sectors. The *Victorian Energy Efficiency Target Regulations 2008* (the Regulations) prescribe the activities that result in a reduction in greenhouse gas emissions. The scheme is also designed to foster investment, employment and technological progress in energy reduction industries. The Essential Services Commission (the Commission) is responsible for administering the VEET Act and Regulations.

Schedule 11 (ceiling insulation) of the Regulations was effectively removed from the VEET scheme on 28 July 2009, when the then Minister for Energy and Resources declared that a discount factor of zero would be applied to this activity. This discount factor is set to expire when the Commission gazettes guidelines concerning Schedule 11 (ceiling insulation).

This paper is to inform accredited persons (APs), industry stakeholders and other interested parties on the proposed administrative requirements that will support these guidelines and enable the re-introduction of insulation activities into the VEET scheme. The paper is also intended to seek feedback on these proposed requirements.

GLOSSARY

accredited person	A person accredited under Part 3 of the <i>Victorian Energy Efficiency Target Act 2007</i>
Act	<i>Victorian Energy Efficiency Target Act 2007</i>
Commission	The Essential Services Commission established under section 7 of the <i>Essential Services Commission Act 2001</i>
Commission website	The website of the Essential Services Commission – www.esc.vic.gov.au
Guidelines	Guidelines for the Victorian Energy Efficiency Target scheme, published by the Commission and provided by section 74 of the Act
Regulations	<i>Victorian Energy Efficiency Target Regulations 2008</i>
VEET scheme	Scheme established by the Act
VEET website	The website of the Victorian Energy Efficiency Target scheme – www.veet.vic.gov.au

ACRONYMS

AISC	Australian Industry Skills and Committee
AP	accredited person
ESV	Energy Safe Victoria
HIP	Home Insulation Program
HIP RC	Home Insulation Program Royal Commission
HRCW	High Risk Construction Work
LEI	Licensed Electrical Inspector
MST	Mandatory Safety Training
OHS	Occupational Health and Safety
RTO	Registered Training Organisation
SWMS	Safe Work Method Statement
VEEC	Victorian Energy Efficiency Certificate
VEET	Victorian Energy Efficiency Target

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1 INTRODUCTION

1.1 PURPOSE

The Essential Services Commission (the Commission) is seeking feedback from accredited persons (APs), industry stakeholders and other interested parties about proposed administrative requirements for the re-introduction of ceiling and under floor insulation activities in the Victorian Energy Efficiency Target (VEET) scheme.

The proposed requirements set out in this consultation paper are only applicable for insulation activities completed under the VEET scheme.

1.2 BACKGROUND

The Commission is responsible for administering the *Victorian Energy Efficiency Target Act 2007* (the Act)¹, *Victorian Energy Efficiency Target Regulations 2008* (the Regulations), and the *Victorian Energy Efficiency Target Guidelines* (the Guidelines).

The Regulations include Schedule 11 (ceiling insulation) and Schedule 12 (under floor insulation). Schedule 11 was effectively removed from the VEET scheme on 28 July 2009, when the then Minister for Energy and Resources declared that a discount factor of zero would be applied to this activity. The Minister undertook this action as a result of incentives offered under the former federal Home Insulation Program (HIP). The discount factor of zero applying to Schedule 11 has since been extended a number of times and remains in place today. In late December 2015 the then Minister for Energy and Resources declared that the zero discount factor for ceiling insulation would expire when the Commission gazetted guidelines concerning insulation activities, unless sooner revoked.

¹ Section 7(1) of the Act provides the Commission with responsibility for the general administration of the Act.

In response to the discount factor being set to zero, the Commission undertook the following actions:

- approval of existing accredited persons (APs) and installers for Schedules 11 and 12 was removed, with a new application process to be initiated following the introduction of revised administrative requirements
- new approvals for APs and installers for Schedules 11 and 12 were placed on hold, and
- product approvals for Schedules 11 and 12 were placed on hold, with existing approved products to be reviewed.

Stakeholders were also informed that until notified of the effective date of new administrative requirements, activities completed under Schedules 11 and 12 were not eligible to create Victorian energy efficiency certificates (VEECs).²

1.3 OUTCOMES OF THE HOME INSULATION PROGRAM

It has been extensively documented that poor insulation installation practices under the HIP resulted in property fires and fatalities, causing the HIP to be the subject of a range of reviews and inquiries, including a Royal Commission. The report of the Royal Commission into the Home Insulation Program (HIP RC) identified failings in a number of areas, including with the administration of the program, the identification and management of risks, elements of the required installer training and competencies, and how the program dealt with electrical safety issues.³

The outcomes of the HIP RC have shown that processes and procedures for insulation installation undertaken under the VEET scheme must be rigorous and robust. They must ensure the safety of householders, insulation installers and the general public.

² Although the discount factor of zero only applies to Schedule 11 activities, risks involved in activities undertaken for Schedule 12 have been identified as being sufficiently similar to those of Schedule 11 that the administrative requirements will apply equally to both schedules.

³ Hanger I, 2014, *Report of the Royal Commission into the Home Insulation Program*, Commonwealth of Australia.

Additionally for VEET activities, these processes and procedures need to assist in confirming that the correct level of abatement required by the Act and Regulations has been achieved.

1.4 INSULATION ADMINISTRATIVE REQUIREMENTS REVIEW

In preparation for the potential re-introduction of insulation activities into the VEET scheme, the Commission is undertaking a general review of the administrative requirements for Schedule 11 (ceiling insulation) and Schedule 12 (under floor insulation). This review concentrates on identifying and mitigating risks involved in undertaking these activities, and has drawn on relevant recommendations from the HIP RC.

The responses received for this consultation paper are an important part of the review.

1.5 INSULATION INSTALLER SAFETY AND TRAINING

For VEET scheme activities that have been identified as ‘high risk’, the Commission requires installers to successfully complete mandatory safety training (MST) units of competency before being approved to undertake these activities⁴, the installation of insulation is one such high risk activity. The Commission acknowledges that one of the failings identified by the HIP RC concerned installer training and competencies, and so considers the requirement for adequate and appropriate insulation MST units of competency to be particularly important.

The current MST requirements for VEET insulation activities include the following two core units of competency:

- Schedule 11: CPCCPB3027A – *Install ceiling insulation*
- Schedule 12: CPCCPB3014A – *Install batt insulation products*

⁴ Units of competency are available from any registered training organisation (RTO) that has them in scope and is approved to provide them as a training component.

Successfully completing these two units constitutes a critical component of the training required for installers to be approved to undertake VEET insulation activities.

The Commission's insulation administrative requirements review has identified that the current versions of both these units refer to the standard *AS 3999:1992 – Thermal insulation of dwellings – Bulk insulation – Installation requirements*.⁵ This standard has now been superseded by *AS 3999:2015 – Bulk thermal insulation – Installation*.

The Commission has also found that the endorsement dates for each unit of competency predate the release of the superseding standard, with CPCCPB3027A endorsed on 2 March 2010 and CPCCPB3014A endorsed on 25 September 2008. It is understood that neither unit has been reviewed or amended since these endorsement dates.

The Commission considers that the re-introduction of insulation activities into the VEET scheme should not occur before a review of the units of competency CPCCPB3027A and CPCCPB3014A has been completed.

The Australian Industry and Skills Committee (AISC) recently released a communique⁶ stating that the Construction Industry Reference Committee is commissioned to:

- redesign CPCCPB3027A to ensure it more comprehensively covers both the skills and safety requirements of industry
- ensure that CPCCPB3014A reflects the requirements of industry in understanding the variety of products and their uses in meeting changing Standards, and
- ensure that the units allow for effective and safe methods of instalment of insulation.

The Commission has been informed that both units of competency are under review with this review expected to be completed in the 2016-17 financial year.⁷

⁵ For more information, please see www.training.gov.au

⁶ For more information, please see www.aisc.net.au/media/aisc-communique-22-september-2016

⁷ For more information, please see www.artibus.com.au/?page_id=296

Further information:

The installation of insulation in Victoria is governed by the best practice standard, *AS 3999:2015*. The standard includes detailed procedures and requirements for pre-installation site assessment, insulation installation and safety considerations, as well as appendices covering particular site environment and insulation issues.

The standard *AS 3999:2015* was developed by a Standards Australia Technical Committee. This committee comprised representatives of industry associations, consumer organisations, government regulators, public health and safety officials, as well as academic and scientific institutions. The new standard was significantly revised and updated for the following areas:

- updated advice on personal safety for insulation installers
- updated requirements aimed at improving the performance of installed insulation and information on new products and technologies, and
- the introduction of comprehensive detailed drawings to complement the text and to help demonstrate what compliant installations could look like.

For more information, please see – www.standards.org.au/OurOrganisation/News/Pages/New-revised-standard-for-installation-of-bulk-thermal-insulation.aspx

2 CONSULTATION

2.1 PROPOSED ADMINISTRATIVE REQUIREMENTS OVERVIEW

The Commission is proposing the following administrative requirements to assist in mitigating risks in three core components of a VEET insulation activity:

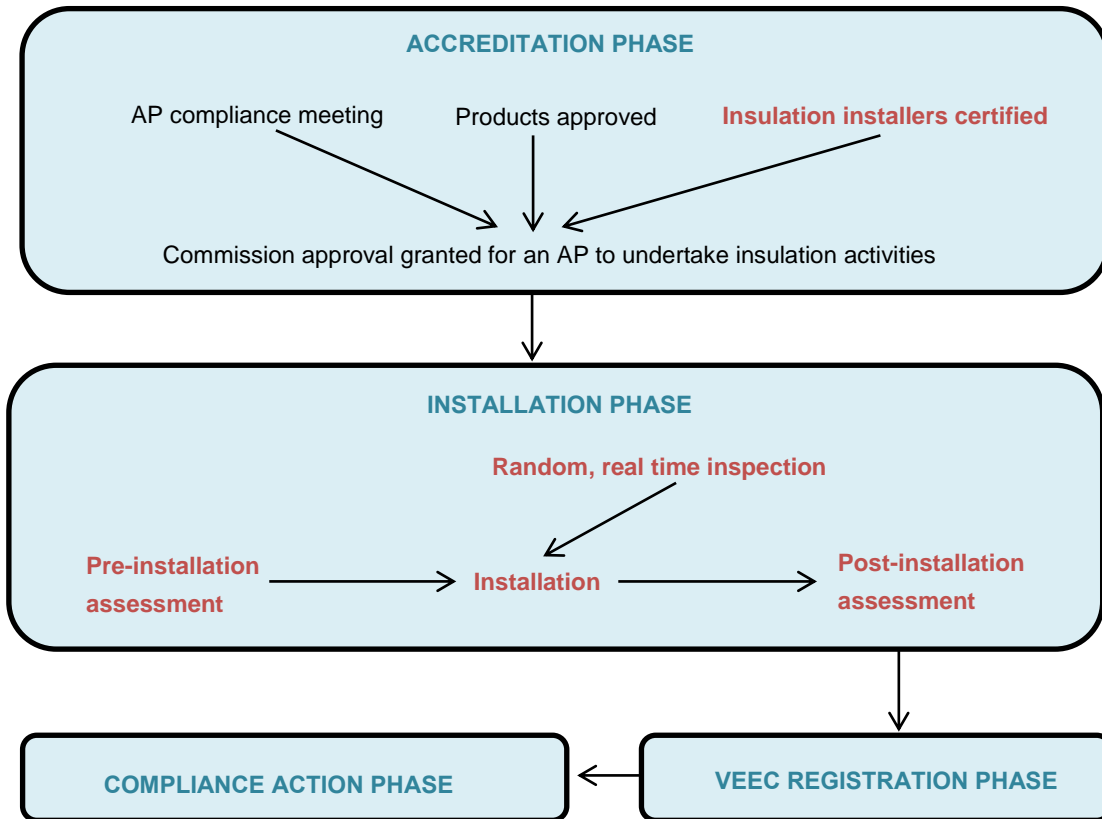
- **Pre-installation:** requirements to manage the risks (electrical or otherwise) found in sites identified for insulation installation
- **Installation:** requirements to ensure insulation installers have an adequate and appropriate skillset, and
- **Post-installation:** requirements to manage the risk of incorrect insulation installation causing electrical hazards and/or property fires.

The administrative requirements for each of these components are proposed to assure the Commission and the community that insulation activities undertaken for the VEET scheme are carried out in a manner that (as far as practical) ensures the safety of installers and householders, and achieves the level of abatement required by the Regulations.

The outcomes of the HIP RC and the contents of *AS 3999:2015* were considered in developing these requirements.

While the Commission is responsible for administering insulation activities undertaken under the VEET scheme, it is not a safety regulator. With many of the risks to be mitigated being safety related, it is important that the Commission involves other relevant regulators to assist in administering these activities. To this end, the Commission will work with WorkSafe Victoria and Energy Safe Victoria to ensure that any identified occupational or electrical safety risks are appropriately managed and mitigated.

The following diagram outlines the general process proposed for VEET insulation activities.



The re-introduction of insulation activities into the VEET scheme will occur when the Commission gazettes guidelines concerning Regulation 6(2)(a) (i.e. Schedule 11 - ceiling insulation), unless the Government revokes the zero discount factor for the ceiling insulation activity prior to the guidelines being gazetted. Elements of the above process may be included in these guidelines to assist in the administration of VEET insulation activities.

This consultation paper seeks comment on the components of the process highlighted in the above diagram in red text, with the following sections providing detail about these proposed administrative requirements.

2.2 ACCREDITATION PHASE

Before an AP can undertake insulation installation for the VEET scheme, they will need to assure the Commission that they are competent, informed and have proper processes and procedures in place in relation to the installation of insulation. The required steps of an AP compliance meeting with the Commission and the use of approved products outlined in the process diagram are common across many VEET activities, but where insulation activities differ is in the certification of insulation installers.

The HIP RC has shown that for the installation of insulation to be carried out in a correct and safe manner, it is important that insulation installers hold appropriate training and qualifications. The Commission is therefore proposing that all installers completing VEET insulation activities, in addition to completing MST units of competency, be required to hold a current and full certification from a Commission-approved certification provider. A certification program approved by the Commission⁸ will have the necessary training and professional requirements to provide surety that an insulation installer has the capability to conduct VEET insulation activities in a safe and proper manner.

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.

⁸ To date, the Commission has not approved any insulation installer certification programs.

The certification requirement for installers is proposed as a measure to assure APs, householders, stakeholders and the general public that insulation installers operating under the VEET scheme have been trained to a high standard, that they possess an appropriate level of work experience, and that they are required to adhere to standards of conduct and professionalism.

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?

2.3 INSTALLATION PHASE

The installation of insulation is in the highest risk category for a VEET activity. During installation, installers may encounter electrical or environmental hazards and/or make incorrect installation decisions that could result in hazardous situations. The outcomes of the HIP RC showed how harmful insulation related incidents can be to the lives of installers and householders.

To assist in mitigating these risks, the Commission proposes to:

- require a pre-installation assessment
- undertake random, real-time inspections of installations while underway, and
- require a post-installation assessment.

These requirements would aid in assuring the Commission, householders and the general public that the companies and installers undertaking insulation activities under VEET are minimising the risks associated with an insulation activity.

As stipulated by the Regulations, insulation installations must be undertaken in accordance with the requirements outlined in the standard *AS 3999:2015 – Bulk thermal insulation – Installation*.

2.3.1 PRE-INSTALLATION ASSESSMENT

To assess if any installation hazards exist at a site, the Commission is proposing that a pre-installation assessment is conducted before any VEET insulation activity is undertaken. Requiring a pre-installation assessment will aid in assuring the Commission, APs, installers, householders, stakeholders and the general public that an insulation installation at that site can be undertaken in a work environment that has been assessed as low risk (taking into consideration any electrical risks, hazardous materials, or other health and safety risks).

The regulations for both Schedules 11 and 12 require that the area to be insulated (minimum of 20m²) must not have been previously insulated. Should evidence of previous insulation be identified during the pre-installation assessment, this detail will be recorded in the pre-installation assessment report. Evidence of previous insulation will impact on the ability of the AP to create VEECs for a site.

The assessment is to be carried out by a Licensed Electrical Inspector (LEI) licensed by Energy Safe Victoria (ESV). An LEI is a class of electrician licensed by ESV to inspect electrical installation work of one of the respective classes of prescribed or non-prescribed electrical installation work.⁹ An AP will need to select and engage an LEI to conduct a pre-installation assessment of each proposed VEET insulation site, with the costs of this assessment to be borne by the AP.

It is proposed that following an assessment at a site, the LEI will be requested by the Commission to provide a copy of the pre-installation assessment report to the householder and AP, with the AP to provide this report to each installer for their information and planning at least three days prior to an installation. Each of these parties (including each installer) will be required to sign and date this report to confirm their receipt of it prior to the installation, as well as provide their consent for the disclosure of personal information to certification and regulatory bodies should the installation for VEET proceed.

⁹ A listing of Victorian LEIs is available on the ESV website – www.esv.vic.gov.au.

If an LEI identifies an immediate electrical safety risk, the insulation installation must not proceed until this risk is removed or not at all (depending on any recommendations from the LEI), with risk details to be included in the pre-installation assessment report.

Should an LEI reasonably form the view that the installation of insulation is likely to make a site electrically unsafe, installation must not proceed until this risk is removed or not at all (depending on any recommendations from the LEI), with risk details to be included in the pre-installation assessment report.

If risks are found to be high, and site remediation works are undertaken to reduce the risks to a low level, the site shall be subject to subsequent assessment(s) and a resulting report(s) until an LEI is satisfied that the risks have been reduced to a low level. The cost of any additional assessment(s) will be borne by the AP.

If requested, the completed pre-installation assessment report shall be provided to the Commission at least three days prior to a VEET insulation installation being undertaken at a site. The AP will be required to provide the signed and dated pre-installation assessment to the Commission as part of the documentation pack for Victorian energy efficiency certificate (VEEC) assessment. A site will only be eligible to create VEECs if an LEI passed it as low risk, and a satisfactory pre-installation assessment report was created, signed and dated by all relevant parties prior to the installation being performed.

This requirement for a pre-installation assessment is also included in section 4.3 of *AS 3999:2015*, with the standard stating that the assessment shall be used for input into the Safe Work Method Statement (SWMS) completed for the site.

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?

Further information:

Section 4.3(a) of AS 3999:2015 states:

Prior to installation an assessment shall be conducted for input into the SWMS by a competent person in carrying out an assessment of the electrical risk from the installation of insulation.

It is a requirement under the *Occupational Health and Safety Regulations 2007* that a SWMS is prepared before commencing 'high risk construction work' (HRCW), if this work poses a risk to the safety of any person, including other persons on site or the public. The installation of insulation may be considered HRCW if:

- there is a risk of a person falling more than two metres
- it is in an area where there are artificial extremes of temperature
- it involves work on or near energised electrical installations or services
- it involves a confined space, or
- it involves the removal or likely disturbance of asbestos.

A SWMS is a safety planning tool that identifies the hazards and risks in HRCW and documents the control measures necessary to manage those risks. Further information can be found at www.worksafe.vic.gov.au/home or by contacting WorkSafe Victoria.

APs should note that in addition to the requirements specified in the VEET Regulations, all activities must be undertaken in accordance with the laws, regulations and codes of practice applicable to that activity.

While the Commission does not administer Occupational Health and Safety (OHS) legislation, it recognises that undertaking prescribed activities under the VEET scheme presents certain OHS risks for APs, their employees, independent contractors and consumers.

The Commission expects that APs will inform themselves of, and undertake all prescribed activities consistently with, their obligations under the relevant OHS law.

2.3.2 INSTALLATION REQUIREMENTS AND RANDOM, REAL-TIME INSPECTIONS

To assess compliance with activity requirements, the Commission may conduct real-time inspections of sites as insulation is being installed. To assist in this process, an AP will be required to notify the Commission of an installation at a site at least three days prior to an installation being carried out. The sites to be inspected will be selected randomly by the Commission from these future VEET insulation installations.

Real-time inspections will provide assurance to the Commission that insulation activities are being undertaken in accordance with all activity requirements. They will be conducted in the presence of a Commission staff member, by appropriate and competent professionals selected by the Commission and authorised to undertake such inspections.

An inspection will assess the installation according to any applicable safety, AS 3999:2015 or abatement requirements, and may involve a review of relevant documentation (including accreditations and certifications), product usage and adherence to OHS or electrical safety requirements.

If an installation inspection identifies any immediate risks to the health and safety of an individual, or to the electrical safety of a site, these will be reported to the householder, the AP, the Commission-approved installer certification provider, ESV and/or WorkSafe Victoria as applicable.

Similarly, should non-compliance with the VEET activity requirements be established by an installation inspection, the certification provider, ESV and/or WorkSafe Victoria may be informed regarding this non-compliance. In this situation, compliance actions undertaken by the Commission, certification provider, ESV and/or WorkSafe Victoria may result.

A report detailing the outcomes of a random, real-time installation inspection will be provided to the Commission by the professional(s) who conducted the inspection for the Commission to consider at the time of activity assessment.

Should any installer not holding current and full certification be identified as having completed an insulation installation under the VEET scheme, the installation will be viewed as non-compliant and therefore not accepted for VEEC creation.

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?

2.3.3 POST-INSTALLATION ASSESSMENT

Following the completion of a VEET insulation installation at a site, an AP will need to select and engage an LEI to conduct a post-installation assessment. The costs of this assessment will be borne by the AP and shall be completed within two days of an installation being completed.

Similar to the pre-installation assessment, this proposed post-installation assessment will assure the Commission, householders, stakeholders and the general public that the insulation installation has been undertaken in accordance with the requirements of the Regulations and *AS 3999:2015*, and that the final installed environment will not:

- a) constitute a fire or electrical hazard that may result in property damage, or
- b) create an unsafe environment for any person(s) who may enter the space at a later date.

The Commission may also use this assessment to make sure the activity has achieved the abatement required by, and in adherence to, the Regulations.

It is proposed that following an assessment at a site, the LEI will be requested by the Commission to provide a copy of the post-installation assessment report to the householder and the AP, with these parties required to sign and date the report to consent to the disclosure of personal information to certification and regulatory bodies, and to confirm their receipt of the report. The AP will provide this signed and dated report to the Commission as part of the documentation pack for VEEC assessment.

Should an LEI reasonably form the view that a VEET insulation activity completed at the site will, or is likely to, involve an immediate risk to the health and safety of any individual, or make the premises electrically unsafe, the LEI will be requested by the Commission to provide a copy of the post-installation risk assessment report to WorkSafe Victoria and/or ESV within two days of the assessment being completed.

A site will only be eligible to create VEECs if an LEI has passed it as low risk and a satisfactory post-installation risk assessment report has been created. This includes the report stating that the installation complies with AS 3999:2015 and all activity requirements including any relevant aspects of the:

- *Electricity Safety Act 1998*
- *Gas Safety Act 1997*
- *Occupational Health and Safety Act 2004*
- *Building Act 1993*, or
- regulations under any of these Acts.

If the Commission establishes activity non-compliance through this post-installation assessment, the certification provider, ESV and/or WorkSafe Victoria may be informed and compliance actions may result.

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?

2.4 SUMMARY - PROPOSED ADMINISTRATIVE REQUIREMENTS

The proposed requirements included in this consultation paper for the re-introduction of insulation installation under VEET Schedule 11 or 12, have come about as a result of an ongoing insulation administrative requirements review. These requirements take into account the recommendations of the HIP RC and can be summarised as:

- APs need to be approved by the Commission to carry out insulation installations
- APs need to have all insulation products to be installed approved by the Commission under Schedule 11 or 12 (as applicable)
- installation shall be undertaken (only) by an installer holding a current and full certification from a Commission approved-certification provider

- insulation installation shall only be undertaken if the area to be insulated (minimum of 20m²) has not have been previously insulated (as stipulated in Schedules 11 and 12 of the Regulations)
- insulation installation shall only be undertaken at a site passed as low risk by a Licenced Electrical Inspector (licensed by Energy Safe Victoria) through a pre-installation assessment, with this assessment paid for by the AP
- during a pre-installation assessment, should an LEI identify an immediate electrical safety risk, the insulation installation must not proceed until this risk is removed or not at all (depending on any recommendations from the LEI), with risk details to be included in the pre-installation assessment report
- during a pre-installation assessment, should an LEI reasonably form the view that the installation of insulation is likely to make a site electrically unsafe, installation must not proceed until this risk is removed or not at all (depending on any recommendations from the LEI), with risk details to be included in the pre-installation assessment report
- following a pre-installation assessment, an LEI will be requested by the Commission to provide a copy of the pre-installation assessment report to the householder and the AP, with the AP to provide this assessment report to each installer at least three days prior to an installation
- APs need to notify the Commission of an insulation installation at a site at least three days prior to the installation taking place
- only insulation products approved by the Commission may be installed
- as stipulated by the Regulations, insulation installations must be undertaken in accordance with the requirements outlined in the standard *AS 3999:2015*
- while a site is having insulation installed for the VEET scheme, it may be subject to a random, real-time inspection undertaken by the Commission
- installed sites will be subject to a post-installation assessment conducted by an LEI no more than two days after the installation is completed, with this assessment paid for by the AP

- following a post-installation assessment, an LEI will be requested by the Commission to provide a copy of the post-installation assessment report to the householder and the AP
- following a post-installation assessment, should an LEI reasonably form the view that a VEET insulation activity will, or is likely to, involve an immediate risk to the health and safety of an individual, the LEI will be requested by the Commission to provide a copy of the risk assessment report to WorkSafe Victoria within two days of the assessment being completed
- following a post-installation assessment, should an LEI reasonably form the view that a VEET insulation activity will, or is likely to make the premises electrically unsafe, the LEI will be requested by the Commission to provide a copy of the risk assessment report to ESV within two days of the assessment being completed
- the Commission may use the post-installation assessment to ensure that the activity has achieved the abatement required by, and in adherence to, the Regulations
- unless the Commission instructs otherwise, all applicable activity documentation shall be submitted to the Commission as part of the documentation pack for VEEC assessment, and
- compliance actions may be undertaken by the Commission, certification provider, WorkSafe Victoria and/or ESV should they be deemed warranted.

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.

2.5 TIMELINE

The Commission proposes the following timeline for decision making for this consultation paper:

Public submissions open	12 December 2016
Public submissions close	3 February 2017

2.6 SUBMISSIONS

Stakeholders are invited to comment and provide feedback on any aspect of this consultation paper. Submissions must be received no later than **5:00pm Friday 3 February 2017**, in electronic format if possible.

This document will be made publicly available on the Commission's website at www.esc.vic.gov.au and on the VEET website at www.veet.vic.gov.au. The consultation period will be open for eight weeks. Any confidential or commercially sensitive information provided in submission should be clearly identified and accompanied by a request that it not be made publicly available.

By email to veet@esc.vic.gov.au with the subject line:
'Consultation submission - VEET Insulation Administrative Requirements'.

By mail to:
Scheme Administrator
Victorian Energy Efficiency Target Scheme
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2 Lonsdale Street
Melbourne 3000