

## INFORMATION BULLETIN – CHANGES TO ADMINISTRATIVE REQUIREMENTS FOR SCHEDULE 21C INSTALLATIONS

Version 1.0 – 19 May 2014

The Victorian Energy Efficiency Target (VEET) scheme is a Victorian Government initiative promoted as the *Energy Saver Incentive*.

### Contents

|   |                                       |   |
|---|---------------------------------------|---|
| 1 | Overview.....                         | 1 |
| 2 | Background .....                      | 1 |
| 3 | Changes the ESC is making .....       | 3 |
| 4 | Who is impacted by these changes..... | 4 |
| 5 | Actions you should take now.....      | 4 |

## 1 OVERVIEW

This document is to advise Accredited Persons (APs) and other interested parties of important changes to VEET administrative requirements for prescribed activities carried out under Schedule 21C of the *VEET Regulations 2008*. This activity covers installation of low energy lamps in place of existing 12 volt halogen lamps. The changes have been decided by the Essential Services Commission (ESC) following an extensive review of installation safety and product performance issues. The ESC also took account of consultation submissions from interested parties.

The new requirements formally commence on **Monday 19 May 2014 at 6pm**. From this date, installations under Schedule 21C can only be undertaken by licensed electricians. Schedule 21C installations carried out by installers who are not licensed electricians cannot result in the proper creation of Victorian energy efficiency certificates (VEECs). APs undertaking this activity will need to familiarise themselves with the new requirements and ensure their installers for Schedule 21C installations are appropriately licensed.

## 2 BACKGROUND

During March and April 2014 the ESC began receiving reports about a range of safety issues involving Schedule 21C installations by installers who had completed VEET mandatory safety training but lacked

electrical qualifications, as well as about an apparently high failure rate for some LED downlight lamps being installed under this activity. In response, the ESC undertook a number of urgent actions, including:

- In early April, an email alert was circulated to scheme stakeholders, inviting submissions about any concerns with this activity. In response, a total of 18 submissions were received, about two-thirds expressing concerns about installation safety and/or product performance issues. In brief, the concerns related to installer safety, product performance, customer satisfaction and improper installations because:
  - many LED downlights appeared to contravene the Regulations by not being compatible with pre-existing electronic transformers, leading to lamp failure or flickering, and
  - checking for compatible transformers was likely to involve inappropriately trained installers working at heights, in confined spaces (roof cavities) and in close proximity to mains voltage appliances.
- A phone audit of a targeted sample of 100 Schedule 21C installations was also undertaken in April, with the following key findings:
  - more than 4% of approximately 2,500 LED downlights installed at the audited premises were reported as flickering, failed or experiencing intermittent failure
  - 35% of the audited premises reported one or more flickering, failed or intermittently failing LED downlights, and
  - 6 sites reported that installers performed work in roof cavities to identify existing transformers.
- Following this, with the assistance of a contracted subject matter expert (an A Grade qualified electrician), the ESC conducted field audits at a number of sites, discovering illegal electrical wiring at one site and product performance issues at all sites resulting from inadequate wiring and/or incompatible transformers. The ESC's subject matter expert also confirmed that electronic 'discriminator' devices are not adequate to confirm the compatibility of low-voltage LED lamps with existing electronic or magnetic drivers.
- Concurrently, the ESC's external risk consultant was engaged to provide independent advice relating specifically to Schedule 21C issues as part of the ongoing VEET Safety Review. The risk consultant made a number of recommendations, including
  - The ESC should amend its administrative requirements for Schedule 21C installations to require qualified electricians only to undertake this activity (that is, identical to existing requirements for the Schedule 21D activity involving installation of mains voltage low energy downlight fittings in place of existing 12 volt halogen fittings).
  - Qualified electricians should conduct pre-installation inspections to identify any potential safety hazards or other installation issues.

- The installation process should immediately cease where an existing non-compliant or unsafe installation and/or unsafe electrical equipment is identified.
- Further, the ESC has engaged an independent testing laboratory to carry out compatibility testing on various combinations of LED downlight lamps approved for use in the VEET scheme with a range of electronic transformers most commonly available in Australia. This independent testing is part of the ESC's ongoing program of validating product applicants' claims of product performance. Stakeholders will be advised of the results of this independent testing once completed

### 3 CHANGES THE ESC IS MAKING

As a result of the actions above, in order to mitigate risks around the Schedule 21C activity, the ESC is making the following administrative changes:

1. The ESC is amending the administrative requirements for Schedule 21C installations to replicate those already in place for Schedule 21D – that is, a Schedule 21C or 21D installation may only be undertaken by a qualified electrician or registered electrical contractor licensed by Energy Safe Victoria. (NOTE: Any other installer assisting with a Schedule 21C or 21D installation must also have completed VEET mandatory safety training as already required by the ESC.)
2. A pre-installation inspection, to identify any potential safety hazards or other installation issues, must be carried out by the licensed electrician before any Schedule 21C or 21D installation commences.
3. As part of the pre-installation inspection before a Schedule 21C activity, the licensed electrician must record the brand and model number of all pre-existing electronic or magnetic transformers in order to confirm claimed compatibility of LED replacement lamps with the transformers. (NOTE: Use of an electronic 'discriminator' device alone is **not** considered sufficient to confirm compatibility as required by the Regulations.)
4. Where a pre-installation inspection identifies any existing non-compliant installation and/or unsafe electrical condition in accordance with applicable legislation and Australian Standards, all installation works under Schedule 21C or 21D **must immediately cease**. (NOTE: In accordance with the *Electricity Safety Act 1998*, the occupier and/or owner of premises where a non-compliant installation and/or unsafe electrical condition is identified is required either to rectify or remove any identified unsafe electrical condition.)
5. The ESC is expanding the VEET audit and compliance program to ensure that the new administrative requirements for Schedules 21C and 21D are being adhered to and that required documentation is submitted for scrutiny before the registration of any VEECs associated with such installations.

6. As noted above, the ESC is expediting its current program of independent testing of targeted samples of LED downlight products in order to validate claims of compatibility with electronic transformers commonly used to drive 12 volt halogen downlights in Australia.
7. Lastly, as part of its regular review of VEET mandatory safety training requirements, the ESC will investigate the viability of so-called 'disconnect/reconnect' electrical licensees, having completed the UEENEEP010A 'Disconnect-reconnect appliances connected to low voltage installation wiring' course, to undertake Schedule 21C (and possibly also Schedule 21D) installations.

## 4 WHO IS IMPACTED BY THESE CHANGES

All APs undertaking, or expecting to undertake, VEET installations under Schedule 21C of the Regulations are impacted by these above administrative changes, which commence on **Monday 19 May 2014 at 6pm**. VEEC creation applications in respect of Schedule 21C installations carried from this date forward will be required to provide documentary evidence of the licensed electrician who performed the installation. Other documentary evidence, such as information identifying pre-existing transformers, may also be required on request.

## 5 ACTIONS YOU SHOULD TAKE NOW

Affected APs should take steps immediately to ensure that all Schedule 21C installations carried out on or after **6pm on Monday 19 May 2014** are performed only by qualified electricians or registered electrical contractors licensed by Energy Safe Victoria. Further, APs should ensure that any other installers assisting with Schedule 21C installations have also completed mandatory safety training as required by the VEET Guidelines.

APs should ensure that their administrative requirements for Schedule 21C or 21D installations include the requirement for a pre-installation inspection, to identify any potential safety hazards or other installation issues, to be carried out by the licensed electrician before any Schedule 21C or 21D installation commences.

Further, APs should ensure that their administrative requirements for Schedule 21C or 21D installations include the requirement that where a pre-installation inspection identifies any existing non-compliant installation and/or unsafe electrical condition in accordance with applicable legislation and Australian Standards, all installation works under Schedule 21C or 21D **immediately cease**, and that in accordance with the *Electricity Safety Act 1998*, the occupier and/or owner of premises where a non-compliant installation and/or unsafe electrical condition is identified is notified that they must either rectify or remove any identified unsafe electrical condition.

APs' administrative requirements for Schedule 21C installations must also include the requirement to collect information about the brand and model number of pre-existing electronic or magnetic transformers in order to confirm claimed compatibility with LED replacement lamps.

In addition to this information bulletin, APs should familiarise themselves with relevant sections of the following documents available from the Publications page of the VEET website at [www.veet.vic.gov.au](http://www.veet.vic.gov.au):

- *Explanatory Note – Creating VEECs from prescribed activities* (Version 5.14 – 19 May 2014), noting in particular the section on Mandatory Safety Training for Installers and the appendix relating to incandescent lighting replacement activities.
- *Explanatory Note – Compliance requirements for APs by prescribed activity* (Version 4.10 – 19 May 2014), noting in particular the sections relating to Schedules 21C and 21D.
- *Information Bulletin – Changes to Mandatory Safety Training (MST) requirements* (Version 1.1 – 19 May 2014).
- *Mandatory information for VEEC assignment forms: Lighting (Activity 21) – residential premises* (Version 3.4 – 19 May 2014)
- *Mandatory information for VEEC assignment forms: Lighting (Activity 21) – business premises* (Version 1.5 – 19 May 2014).

APs with queries about the new administrative requirements for Schedule 21C should contact VEET Support on (03) 9032 1310 or [veet@esc.vic.gov.au](mailto:veet@esc.vic.gov.au).