

5 April 2018

Department of Environment, Land, Water and Planning  
VEET Scheme Policy Team  
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### **VEET Guidelines Submission**

Lighting Council Australia (LCA) welcomes the opportunity to comment on the Victorian Energy Upgrades Review of the Victorian Energy Efficiency Target Guidelines.

Following the introduction of Project-Based Activities into the Victorian Energy Efficiency Target Regulations in 2017, the regulations now allow for accredited persons to carry out site-specific activities in order to reduce greenhouse gas emissions. As part of these activities, upgrades may occur to lighting equipment, replacing incumbent technology with more energy-efficient alternatives.

LCA advocates for the use of quality lighting products, in fit-for-purpose applications, installed appropriately with proper decommissioning of replaced equipment.

LCA believes that any lighting upgrades that occur under Project-Based Activities should be subject to the same compliance requirements of Schedule 34 lighting upgrades as referenced in the relevant Act, Regulations, Guidelines and explanatory notes. This includes but is not limited to:

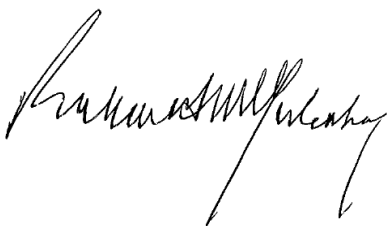
- evidence of electrical compliance;
- evidence of decommissioning;
- evidence of AS/NZS 1680 compliance; and
- product requirements.

Enacting these requirements will assist in reducing some of the perverse outcomes and unintended consequences of the Scheme as there are incentives for low quality installations that maximise the certificate value over providing quality outcomes for consumers.

Broadly, LCA considers a strong effort in audit and enforcement of paramount importance in ensuring compliance with the Scheme's requirements.

Yours sincerely,

Richard J Mulcahy



Chief Executive Officer