

# Welcome to our April 2026 Compliance Update.

Canonical: <https://northmoregordon.com/news/april-2026-compliance-update/>

## Details:

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### ## About this update

This dated news record has been reorganised for clear reading and connected to current guidance.

Publication date: April 16, 2026.

Status note: Present-tense statements, market figures, deadlines and program details in the archived record belong to its publication date. Check current official sources before making a decision.

### ## What this article reported

Dear Valued Partners,

As regulatory requirements continue to evolve across the schemes, it is important to remain up to date and ensure your processes align with the latest program rules. Below is a summary of key updates and actions required for this month.

#### 1. VEU Residential Activities (1, 3 & 6) - Revised Evidence Requirements (Update 15 April 2026)

Following the program update released on 15 April 2026, the Essential Services Commission has revised the recently introduced record-keeping requirements for water heating and space heating and cooling activities.

#### What Has Changed

The following previously introduced photographic evidence requirements have now been deferred and removed from the Activity Guide:

Main switchboard before installation

Main switchboard after installation (cover removed)

Installed circuit showing amperage rating

Main switch showing amperage rating

Installation wiring showing type and size (where visible)

#### What Remains in Effect

The following requirements continue to apply:

Existing product(s) before upgrade, in situ and connected to gas or electricity supply

Installed product(s) after installation, including full wall and surrounding environment (indoor & outdoor units)

We expect our loyal partners to take note of these changes and/or should you have any questions, feel free to reach out to our compliance team.

## 2. VEU Commercial Water Heating (Activity 44)

A minimum co-payment of \$10,000 (incl. GST) is required per installed product

What You Need to Do:

Ensure invoicing and customer payment processes reflect this requirement

Co-payment must be collected and evidenced in line with program rules

Effective Date:

31 March 2026

## 3. VEU C&I; Solar PV - Training & Record Keeping Updates (Effective 24 March 2026)

Training & Competency Requirements

All installers and on-site workers must hold a current construction induction card (White Card)

Workers with superseded units of competency remain compliant if they hold a valid White Card

White Cards issued in other Australian jurisdictions are accepted

Record-Keeping & Activity Date Requirements

Evidence of DNSP must be a Negotiated Connection Contract include a post-installation validation/output document

The document must clearly include a post installation validation / output and show the date of DNSP validation/approval

Activity Date Definition:

The activity (implementation) date is the DNSP 'Network Commissioning Test Approval' date, as stated in the DNSP completion letter or email

For partners participating in C&I; Solar PV, we encourage you to contact your relevant Project Coordinator for further guidance:

MJ - m.kaur@northmoregordon.com

Sanah - s.bhalla@northmoregordon.com

Lan - l.hoang@northmoregordon.com

These updates are critical to maintaining compliance and avoiding delays in certificate creation. Please ensure full implementation within the required timeframes.

## 4. STC Battery Installations - Photo Evidence Requirements (Reminder)

A reminder that as of 1 March 2026, all installers must take clear, geo-tagged and time-stamped photographs of critical labelling for every solar battery installation.

This requirement is in addition to existing installer on-site verification photos, including evidence of the installer being present during the main stages of installation.

Requirements:

Ensure all installations include clear photo evidence of critical labelling and system identification

All on-site evidence must be collected and retained as part of compliance documentation

## Compliance Requirement:

This obligation is legislated under Regulation 20ACA(12)(h)(iii) of the Renewable Energy (Electricity) Regulations 2001

## Important:

Failure to comply may result in failed STC claims and potential compliance action

### 5. Battery Rebates are changing from 1 May 2026

From 1 May the STC factor will taper according to the amount of capacity installed:

From 0 kWh up to 14 kWh (inclusive): STC factor applied at 100%

Every kWh greater than 14 and up to 28 kWh (inclusive): STC factor applied at 60%

Every kWh greater than 28 and up to 50 kWh (inclusive): STC factor applied at 15%.

Keep in mind that STCs are calculated based on the usable capacity of your battery.

Only the first 50kWh of usable capacity are eligible for STCs.

Some STC calculation examples below:

| Current | From 1 May | | --- | --- | | 10kWh system (100% x 8.4) Total 84 STCs | \* 10 kWh (100% x 6.8) Total 68 STCs | | 20kWh system (100% x 8.4) Total 168 STCs | \* First 14kWh (100% x 6.8) = 95.20 \* Remaining 6 kWh (60% x 6.8) = 24.48 Total 119 STCs | | 30kWh system (100% x 8.4) Total 252 STCs | \* First 14kWh (100% x 6.8) = 95.20 \* Second 14 kWh (60% x 6.8) = 57.12 \* Remaining 2 kWh (15% x 6.8) = 2.04 Total 154 STCs |

### 6. NSW ESS - CCEW Process Update (Effective 1 July 2026)

Building Commission NSW (BCNSW) will introduce the following changes:

Mandatory submission of CCEW forms via the eCert portal

Signed CCEWs will no longer be required

## Important:

CCEWs must continue to be supported by sufficient evidence, including:

Installer declarations

Commissioning reports

Further guidance will be provided as requirements are refined.

Reminder: Vintage 2025 VEEC Claims - Deadline Approaching

Please note that the cut-off date for all 2025 Vintage submissions to Northmore Gordon is Friday, 1 May 2026 .

Partners are strongly encouraged to ensure all required documentation is finalised and submitted well ahead of the deadline to avoid missing this final processing window.

## Closing remarks

Staying on top of regulatory changes and maintaining strong compliance practices is essential to ensuring the integrity of the schemes and the smooth processing of certificates.

We appreciate your continued cooperation and commitment to compliance.

For further information or clarification, please contact our Compliance Team via [compliance@northmoregordon.com](mailto:compliance@northmoregordon.com)

Kind regards, Northmore Gordon Compliance Team

### ## How to use this information now

For current use, confirm the applicable scheme rules, regulator notices, market date and reporting period. Keep historical prices or forecasts separate from present quotes and verified outcomes.

Separate source-reported facts from forecasts, targets and commentary. For a current project, retain the official source, version, effective date, assumptions and decision record in the evidence file.

### ## Related guidance

Environmental certificates

Government schemes

Energy audits

Measurement and verification

Solar PV

Current articles and guidance

Contact Northmore Gordon

### ### What photographic evidence requirements were removed from the VEU Activity Guide for Residential Activities 1, 3 & 6 following the 15 April 2026 update?

The Essential Services Commission removed previously introduced photographic requirements for main switchboard before and after installation (cover removed), installed circuits showing amperage rating, main switch amperage rating, and installation wiring type and size. These prescriptive photo requirements created compliance burden without material evidence value. Partners must still provide before-upgrade photos (in situ, connected to gas or electricity) and after-installation photos including full wall and surrounding environment (indoor and outdoor units). We assist installers by clarifying which evidence remains mandatory and which optional, reducing unnecessary documentation while maintaining scheme compliance.

### ### What is the co-payment requirement for VEU Commercial Water Heating (Activity 44), and what are the practical implications for invoicing?

Effective 31 March 2026, a minimum co-payment of \$10,000 (including GST) per installed product is required for VEU Commercial Water Heating. This means partners must collect customer contributions before completing work and evidence payment in line with program rules. The co-payment affects project economics: it shifts cost to customers and reduces net certificate proceeds available for revenue sharing. Invoicing processes must separately itemize the co-payment obligation and confirm collection before submission. We advise on integrating co-payment requirements into customer contracts and investment cases to ensure transparency and prevent compliance failures at claim stage.

### ### How does the White Card training requirement for VEU C&I; Solar PV installers affect project delivery as of 24 March 2026?

All installers and on-site workers must hold a current construction induction card (White Card) effective 24 March 2026. Workers with superseded competency units remain compliant if holding a valid White Card; interstate White Cards are accepted. This requirement ensures consistent site safety standards across all installations. Projects cannot proceed if any worker lacks current credentials, creating a scheduling risk if staff training lapses. Partners must verify White Card status before site mobilization.

and maintain records as part of evidence files. We help partners screen installer compliance and build training schedules to prevent project delays.

### What defines the 'activity date' for VEU C&I; Solar PV under the March 2026 record-keeping update, and why does it matter?

The activity (implementation) date is the DNSP 'Network Commissioning Test Approval' date as stated in the DNSP completion letter or email. This is critical because the implementation date determines eligibility under vintage year rules, certificate calculation, and scheme cutoff dates. Using an incorrect date can render a claim ineligible or create retrospective compliance issues. Evidence must include a Negotiated Connection Contract with post-installation validation showing DNSP approval. This requirement shifts responsibility to documenting the network operator's formal approval, not the installer's physical completion. We ensure project chronologies capture DNSP approval dates and coordinate evidence gathering to prevent vintage-year mismatches.

### What new photo evidence requirement applies to STC battery installations as of 1 March 2026, and what is the compliance risk?

Effective 1 March 2026, installers must take clear, geo-tagged, and time-stamped photographs of critical labelling for every solar battery installation, in addition to existing verification photos. This is legislated under Regulation 20ACA(12)(h)(iii) of the Renewable Energy (Electricity) Regulations 2001. Failure to comply may result in failed STC claims and compliance action by the Clean Energy Regulator. The requirement creates operational burden: installers must have camera equipment capable of metadata capture and staff trained on protocol. Projects cannot claim STCs without this evidence. We assist installers by specifying labelling standards, reviewing photo protocols before installation, and maintaining evidence chains to meet regulator expectations.

### How will the STC taper for battery installations from 1 May 2026 affect project economics, and how should installers adjust pricing?

From 1 May 2026, STC factors taper by capacity: 100% for 0–14 kWh (inclusive), 60% for >14–28 kWh, and 15% for >28–50 kWh (only first 50 kWh eligible). Example: a 20 kWh system currently generates 168 STCs but will generate only 119 STCs (first 14 kWh at 100% = 95.2 STCs; remaining 6 kWh at 60% = 24.48 STCs). This reduces certificate revenue approximately 29% for mid-range systems, materially affecting payback periods and customer value propositions. Installers must revise pricing models and customer quotes before the date to avoid margin compression. We update investment cases with revised STC assumptions and help partners communicate rate changes to customers transparently.

### What NSW ESS process changes does Building Commission NSW introduce effective 1 July 2026, and how do they affect installer compliance?

Effective 1 July 2026, Building Commission NSW makes mandatory submission of Certificates of Compliance for Electrical Work (CCEW) via the eCert portal; signed physical CCEWs are no longer required. However, CCEWs must still be supported by sufficient evidence, including installer declarations and commissioning reports. This digitizes the workflow, reducing paper handling and improving audit trails. Installers must transition to portal submission processes and ensure their evidence files (commissioning reports, test records, declarations) are complete and retrievable. The change simplifies administration but tightens evidence requirements. We advise partners on portal setup, evidence preparation standards, and document retention to ensure seamless compliance under the new digital process.

### What is the significance of the Friday, 1 May 2026 Vintage 2025 VEEC submission deadline, and how should partners prepare?

The 1 May 2026 cut-off is the final date to submit Vintage 2025 VEEC claims to Northmore Gordon. After this date, Vintage 2025 certificates cannot be claimed; work completed in 2025 will be assigned to 2026 or later vintages, affecting certificate value (vintage price varies annually) and revenue timing. Partners must finalize all 2025 documentation, evidence, calculations, and customer nominations well ahead of the deadline. Late submissions risk vintage reassignment and reduced customer proceeds. This deadline creates cash-flow planning requirements for partners who generated 2025 certificates. We assist by tracking submission deadlines, reviewing evidence completeness before cutoff, and coordinating with partners to ensure timely claim submission and vintage optimization.

### How should installers balance the April 2026 VEU evidence requirement changes with investment in documentation systems?

The removal of prescriptive photographic requirements (switchboards, circuit labeling) reduces compliance burden but requires installers to maintain systematic before-and-after documentation of the key elements: existing products in situ and post-installation views including wall and surrounding environment. Rather than specify exact photos, the updated guidance emphasizes quality and completeness of evidence. Installers should invest in standardized documentation templates and photo protocols that capture required context without over-documenting. This approach reduces field burden while maintaining defensible evidence. We review installer documentation protocols against scheme requirements, identify efficiency gains in evidence collection, and helps partners transition to streamlined processes that reduce cost while sustaining compliance and quality.

### How do the April 2026 changes to VEU requirements and May 2026 STC taper changes affect multi-jurisdiction project planning?

Partners operating across Victoria (VEU) and other states must track separate regulatory dates and requirements. The VEU April updates (evidence simplification, co-payment for Activity 44, White Card mandate, DNSP date definition) are jurisdiction-specific. The STC taper (May 1) applies nationally to battery installations. A hybrid project combining solar and battery across states faces different taper regimes and evidence standards. Implementation dates differ, creating coordination complexity: VEU implementation must precede STC commissioning to align evidence and avoid vintage mismatches. Partners should map project timelines to both scheme deadlines and adjust pricing models for each instrument separately. We assist by tracking multi-scheme requirements, identifying timeline conflicts, and coordinating evidence strategies across jurisdictions to optimize certificate eligibility and revenue.