

Essential Services Commission
VEET Division – 21A Training
Level 37
2 Lonsdale St
Melbourne VIC 3000
13 December 2018
Via email: veu@esc.vic.gov.au

Re: TRAINING AND LICENSING REQUIREMENTS FOR ACTIVITY 21A:
CONSULTATION PAPER

Response to the 21A consultation paper;

Green Home Green Planet believes that the introduction of CFL replacement under schedule 21 A does not increase the associated risk safety risks.

AP's have installed millions of CFL's in the roll out of the original programme and did not encounter any significant issues. A breakage clean-up process was instituted during the installation process which delivered excellent results at the time.

Moreover, the stock of CFL's are generally much more recent than the remaining incandescent globes and therefore should be less prone to breakage, than those done under the existing 21 A schedule.

By design the CFL's are less likely to provide a shock risk than the incandescent globes as their terminals are tucked away in the base of the globe.

All lamps replaced under the schedule are recycled in an accredited facility and can be tracked back to an individual installation.

Training

GHGP is in favour of option 2, which relies the AP's to provide comprehensive training on any associated risks and appropriate risk management in installing any product in any schedule of the programme.

GHGP has a CFL breakage and clean-up methodology and associate KIT, a process we implemented on the install phase some years ago. We have provided these details in the process information recently provided to the ESC.

This process has worked very well in the field and we have the ability to track safety incidents under our current processes.

GHGP does not support the introduction of a third party training course as we have experienced very low quality and expensive training courses which are currently mandated by the ESC. The course content, delivery and value for money is currently unacceptable and a waste of resources from all parties.

Transition to New 21A Activity

- All AP's should be required to submit mercury handling and CFL breakage processes, training materials and implementation documentation.
- AP's to provide the ESC training completion schedules including trainer and trainee sign off.
- Evidence of training can be uploaded into the portal for each trained agent.
- Each clean-up is to be registered and "tagged and bagged" for correct disposal.
- ESC to provide regular audits to establish if AP's are follow due process in this area.

Please give me a call if you would like to discuss the above matters.

Mark Ferguson
Director