

10 January 2019

Essential Services Commission

VEET Division – 21A Training

Level 37 2 Lonsdale St

Melbourne VIC 3000

Response to the Proposed Training and licensing requirements for 21A

In response to the consultation paper raised for accredited persons (APs), installers and other interested parties on the framework to minimise safety risks associated with the replacement of lamps, in particular compact fluorescent lamps (CFLs), under activity 21A of the Victorian Energy Efficiency Target Regulations 2018.

Whilst the initial outlined considerations are considerably well thought of, as a practicing Electrician and Electrical Inspector, I would like to take this opportunity to contribute to the success of the activity and increase safety margins not only for the home owners and installers but as well as the Regulatory Bodies.

Although the risks already identified in the Consultation Paper presented are detailed, from my experience in my field there are more areas that needs to be gravely considered if we used non-licensed electricians to carry out the installations.

Additional potential risks:

1. Risk of electrocution when changing an Edison Screw (ES) globe - it is known that there is a large number of ES batten holders incorrectly installed so the metal base can become live if active and neutral conductors are polarized
2. Inability to identify and assess different potential hazards from broken holders or that can easily be broken that can cause damages
3. Risk of electrocution when changing a Bayonet Cap (BC) globe that may have a brittle base and break the tabs or installer may think it's a ES base and break the globe
4. BC batten holders may break or spin in old metal light fittings not earthed and can become live with trying to change a bulb. As the old fittings spin, when globes are being changed the old cables can be twisted and break causing the light to become live
5. Safe isolation of lights is potentially difficult when globe is dead if the installers do not have the right equipment to test and experience.
6. Another challenge with safe isolation of lights and how isolation is performed; when there are use of 2 way switches, 3way switches, sensors, and the biggest factor is people switching the light switch on while working on it, this happens all the time as people are so used to

habit from when they walk into a darker room the switch the light on without precaution if anyone is working on an exposed light or a live one.

7. Broken globes will result in more exposure to the probability of electrocutions due to safe isolation as per earlier points

Even though the Activity may pose to be simple – as changing a light bulb, it still should be considered as an electrical work due to the magnitude of the scale and volume that will have various scenarios and implications that as already rightfully determined in the earlier assessments carried out. The damages not only to properties but as well as potential life threatening hazards is very apparent.

To reiterate – the strict policies and laws implemented to all electrical work must be followed in this Activity without hesitation. To site, the gravity or scope of the work may differ but the unseen and unexpected threats are the same.

Deaths and other major damages can be prevented whilst maintaining the integrity of the VEET scheme can be achieved by choosing Option 1 and using only licensed electricians to conduct the work for 21 A.

Hopefully together we can carry out the Activity 21A with more careful planning and achieve the energy efficient outcome for homeowners and providing impact to the community and our environment.

Thank you in anticipation of considering the points I have outlined.

Kind Regards,

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