



10th January 2019

Essential Services Commission  
VEET Division – 21A Training  
Level 37  
2 Lonsdale St  
Melbourne VIC 3000

Dear ESC,

Please find below Wattly submission to the ESC Consultation on MST for VEU activity 21A.

Wattly is aware how critical the integrity of the VEU is to the long term sustainability of the program. The two largest impacts to the integrity are likely to come from safety issues and improper creation; either can substantially undermine the program.

**The ongoing mandatory safety training (MST) framework we propose to implement to manage safety risks for activity 21A**

Wattly's experience with trained installers under Schedule 21B was not a positive one and Wattly ceased doing Schedule 21A after a period of approximately four months. We found that transient workers were often recruited by the sales businesses for installation work. The attitude of transient workers resulted in lower level of compliance to the VEET requirements, to training programs, and to Wattly's requirements. Transient workers have less to lose than installers holding higher levels of qualifications.

Wattly is concerned that similar behaviour will be seen under activity 21A where there exists greater risks of electric shocks and the additional risk of improper disposal of mercury.

Wattly experienced higher levels of compliance under Schedule 21C-F where licensed electrical contractors were required. Wattly has been active under Sch21C-F for some 5 years with some 20,000+ activities performed in 2015-2016. Wattly continues to support Option 1 (Require a licensed electrician) as a substantially better solution for replacement of lamps under activity 21A.

**The transition arrangements which should be adopted that best manage safety risks after we have made a decision following consultation and prior to the implementation of the proposed ongoing new MST framework**

Wattly support retaining licensed electricians are the requirement for installation work and does not support transition to trained retrofitters.

Yours sincerely,  
Wattly Pty Ltd

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