From: "Lisa" <[redacted]>
To: <veu@esc.vic.gov.au>
Date: 11/01/2019 02:51 PM
Subject: Training and licensing requirements for 21A

Dear ESC,
Thank you for the opportunity to submit a response to the Training and Licensing requirements for 21A

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

Watt Green still maintain the view of electricians for the replacement of globes for Activity 21A (Option 1), put simply we believe electricians will uphold the integrity and reputation of the VEU program and AP's who are at the forefront.
Electricians installing for Activity 21A provide assurance and security in the market for consumers.

To suggest that a licence electrician "may impose a disproportionate cost on industry if implemented" is immaterial as safety of the consumer, installer, and the reputation of the Program outweighs cost.

The Risk associated with the replacement of globes for Activity 21A is addressed below detailing the qualification and responsibility for type of Installer. The table indicates Electricians are capable and qualified, however require training on the Mercury risks and spillages, to be administered by AP's. Electrician experience and qualifications would not require any transitional period to be implemented. AP's who have already been approved for Activity 21A in Dec 2018, have since engaged in Electricians who are currently on the field. This indicates the risks associated for this Activity have been addressed and are satisfactory to the ESC. Whereas the Retrofit Installer will require training in all associated risk, as per the proposed New Retrofit Course which may impose unnecessary compliance issues, compared to electricians.

Electricians current qualifications and licences with the inclusion of training on the Mercury risks and spillages, administered by AP's in our view will provide a comprehensive, proportional and flexible approach to manage the safety risks associated with the replacement of CFLs.

Also, electricians will be able to provide additional services whilst at the consumers home, such as downlights all in the one visit. This will be economical, convenient and a practical way for consumers, electricians and AP's to work effectively.

The Risk associated with the replacement of globes for Activity 21A	Electrician Qualification	Responsibility		Retrofit Installer Qualification Current and/or New	Responsibility
Where a CFL is broken during its replacement, there is a risk of cuts and eye injuries	Experience in the industry of safety measures and PPE - Qualified	Electrician		minimal or no knowledge in this type of situation	AP /Installer : Training required proposed New Retrofit Course
Where a CFL is broken during its replacement, small amounts of mercury may be released, with consequential risks to installers and residents	May have knowledge in this circumstance - AP's to provide information including the processes, should this circumstance arise	AP's		minimal or no knowledge in this type of situation - AP's to provide information in Training material if this circumstance arises	AP /Installer : Training required proposed New Retrofit Course
Where replacement of broken CFLs may also pose electrical risks	Experience in the industry - Qualified	Electrician		minimal or no knowledge in this type of situation - AP's to provide information in Training material if this circumstance arises	AP /Installer : Training required proposed New Retrofit Course
CFL is not sent to a licensed recycling facility it can lead to environmental pollution and non-compliance with the commission's disposal determination under regulation 36(3).	May have knowledge in this circumstance - AP's to provide procedures	AP's		minimal or no knowledge	AP's

If the ESC decides to allow Retrofit installers for this Activity and register through the appropriate training measures as their preferred option 3.1 (to change and upgrade the VU21858 unit), the training should include:

- Hands on training on the removal and replacement of a CFL.
- Outline the dangers of Mercury and measures to take when spillage occurs.
- Steps required on electrical issues.
- Corrective use of PPE and other safety equipment (incl. Mercury Spill kit)

Will this training supersede the experience and qualifications of an electrician, most unlikely.

2. **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**

- If the ESC decides to take the avenue of Retrofit Installers, we propose to maintain the use of electricians until the new course is developed, approved and implemented. This would at least provide the continuing integrity of the program in which we believe the electricians professionalism and experience contribute.

Regards
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