

Essential Services Commission
Victorian Energy Efficiency Target Scheme
Level 37
2 Lonsdale Street
Melbourne VIC 3000

17 January 2018

Via email

veet@esc.vic.gov.au

Energy Makeovers Pty Ltd

7 / 25 Claremont St
South Yarra VIC 3141

T 1300 90 14 16

energymakeovers.com.au

ABN 77 131 681 859

RE: Mandatory safety training requirements – consultation paper

Thank you for the opportunity to respond to the above-mentioned consultation paper dated 11 January 2018.

Energy Makeovers is one of the largest creators of VEECs having created more than 4 million VEECs to date and therefore has a significant depth of experience in dealing with issues associated with VEEC creation.

Energy Makeovers firmly believes that persons undertaking installations under the VEU scheme must be adequately skilled to ensure their own safety and the safety of customers receiving these services. Therefore, Energy Makeovers supports the establishment of minimum training requirements for installers and the continual review and improvement of training requirements and resources. However training and retraining activities can be costly so Energy Makeovers advocates for a sensible balance that delivers value for money for Victorians without compromising on safety outcomes.

Responses to the specific questions raised in the consultation follow.

Proposal 1: New installers must have current MST units

1. Do you believe this proposed requirement is needed? Please provide a rationale for your answer.

Energy Makeovers agrees that installers that have not previously completed similar activities under the VEU scheme should be required to achieve the current MST units before undertaking those activities. This proposal will ensure that new installers can benefit from the most up to date training available.

2. What are the potential impacts for your organisation of implementing this proposed requirement? What are the potential benefits for your organisation of implementing this proposed requirement?

This proposed requirement will not impact on Energy Makeovers or other APs as new installers would have otherwise been required to successfully complete the previous MST units.

Proposal 2: Installers must have updated working at heights training

3. Do you believe this proposed requirement is needed? Please provide a rationale for your answer.

Energy Makeovers does not support this proposal because it will add significant cost to VEU activities for very little benefit. Improvements to working at heights training can only ever be incremental. The greatest deliverer of improved working at heights safety outcomes is the personal experience of installers. The value of personal experience gained over time is recognised in the formal qualifications of professional electricians and plumbers where there is no requirement to retrain and re-qualify for any activities post the completion of their apprenticeship. OHS statistics demonstrate that older more experienced tradespersons are less likely to be injured at work despite receiving less sophisticated formal training much longer ago than their younger counterparts.

Energy Makeovers suggests a sensible alternative to this proposal is to require APs to ensure that installers receive annual working at heights retraining. This retraining can be undertaken informally in-house but evidence of the retraining will be subject to review by ESC during the APs annual ESC audit.

4. What are the potential impacts for your organisation of implementing this proposed requirement? What are the potential benefits for your organisation of implementing this proposed requirement?

The impacts to Energy Makeovers of this proposal is that it will have to invest in requalifying installers in a very simple activity every 2 years. VEU installers often move between APs to continue to undertake activities they have become expert in. This benefits APs because they do not need to invest in training experienced installers and the VEU scheme benefits because a high level of expertise is retained within the scheme. If, however these installers were required to be re-trained every 2 years, the value of their experience will not be recognised or rewarded and many will leave the industry resulting in a less experienced higher cost installer base.

APs will incrementally benefit from continual review and retaining associated with working at heights but this benefit can be achieved by informal in-house retraining without the substantial cost associated with formally requalifying the installers.

5. How would this proposed requirement affect your safety risk management and mitigation strategies?

Energy Makeovers undertakes regular in-house retraining for key safety outcomes including working at heights. Therefore, the impact of this proposal on our safety risk management and mitigation strategies would be the removal of working at heights from our retraining program.

Proposal 3: Installers with superseded units to complete replacement units within a fixed transition period

6. Do you believe this proposed requirement is needed? Please provide a rationale for your answer.

Energy Makeovers does not believe this proposed requirement is needed as it does not believe that safety outcomes will be improved by it. Energy Makeovers is not aware of any statistical or anecdotal evidence that safety outcomes will be improved by the adoption of this proposal. As detailed in our response to question 3, Energy Makeovers believes that ongoing installer

Energy Makeovers Pty Ltd

7 / 25 Claremont St
South Yarra VIC 3141

T 1300 90 14 16

energymakeovers.com.au

ABN 77 131 681 859

experience delivers adequate safety outcomes without the cost burden of continually requalifying installers.

7. What are the potential impacts for your organisation of implementing this proposed requirement? What are the potential benefits for your organisation of implementing this proposed requirement?

The impacts to Energy Makeovers of this proposal is that it will have to invest in requalifying installers every time the MST requirements change. VEU installers often move between APs to continue to undertake activities they have become expert in. This benefits APs because they do not need to invest in training experienced installers and the VEU scheme benefits because a high level of expertise is retained within the scheme. If, however these installers were required to be re-trained every time the MST requirements change, the value of their experience will not be recognised or rewarded and many will leave the industry resulting in a less experienced higher cost installer base.

APs will incrementally benefit from continual review and retaining associated with requalifying installers but this benefit can be achieved by informal in-house retraining without the substantial cost associated with formally requalifying the installers.

Energy Makeovers suggests a sensible alternative to this proposal is to require APs to ensure that all installers receive annual refresher training on MST requirements. This retraining can be undertaken informally in-house but evidence of the retraining will be subject to review by ESC during the APs annual ESC audit.

If you wish to discuss this matter further, please contact me on 0423 0821 689 or bruce@energymakeovers.com.au

Yours sincerely,



Bruce Page

Director

Energy Makeovers Pty Ltd

7 / 25 Claremont St
South Yarra VIC 3141

T 1300 90 14 16

energymakeovers.com.au

ABN 77 131 681 859