

Consultation on training and licensing requirements for activity 21A

Cyanergy Response

We, Cyanergy as an AP, are supporting the “**Option 1: Require a licensed electrician**” under this consultation and therefore, no transition arrangement is required since they are already trained and licensed to handle such risks.

The reasons we believe that it's better over rest of the other two are:

- We support your view that, licensed electricians would address the electrical risks of the CFL replacement better than the other two options.
- Although this option would not specifically address the mercury risks or disposal risks and may impose a disproportionate cost on industry if implemented, a licensed electrician is better capable of handling such risks than a trained retrofitter.
- Recycling disposal is responsibility of both the installer and AP. A licensed electrician is more qualified and experienced to handle the other three risks you considered (Broken glass, Mercury and Electrocutation).
- Even if we train the retrofitters with the minimum safety training, there might be unforeseen risks/issues during installation. Without substantial electrical knowledge, an unexperienced retrofitter is incapable of handling such incidences.
- Finally, our experience tells us that, the longevity and quality of installation is better when it's done by a licensed electrician in compare to the retrofitter.