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Essential Services Commission

VEET Division – 21A Training

Level 37

2 Lonsdale St

Melbourne VIC 3000

13 December 2018

Via email: veu@esc.vic.gov.au

Re: TRAINING AND LICENSING REQUIREMENTS FOR ACTIVITY 21A: CONSULTATION PAPER

Thank you for the opportunity to respond to the above-mentioned consultation paper.

Risks introduced by the adoption of CFL replacement under Activity 21A

The consultation paper suggests CFLs introduce the following four risks:

1. If a CFL is broken during its replacement, there is a risk of cuts and eye injuries.
2. If a CFL is broken during its replacement, small amounts of mercury may be released, with consequential risks to installers and residents.
3. The replacement of broken CFLs may also pose electrical risks (electrocution).
4. If a 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).

However, Energy Makeovers believes the inclusion of CFL replacement under Activity 21A actually reduces safety risks. Our comments regarding these 4 risks follows:

- 1a CFLs are no more prone to glass breakage than incandescent lamps. Given the average age of CFL lamps will be less than the average age of incandescent lamps it is expected that the breakage rate of lamps replaced under Activity 21A will reduce with the inclusion of CFLs.
- 2a The level of mercury contained in CFLs is far less than the level of mercury found in fluorescent tubes and mercury vapour lamps that have been replaced in very large quantities under schedule 34 for the last few years. Electricians that have replaced

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thousands of fluorescent tubes and mercury vapour lamps under schedule 34 have never been advised that there are safety risks associated with this activity and have not received any training in relation to the safe handling of mercury.

- 3a If an incandescent lamp glass is broken, the electrical terminals are exposed. However, the electrical terminals of CFLs are embedded deep in the base and are not exposed if the glass breaks. Therefore, broken CFLs are not an electrical hazard.
- 4a All replaced lamps including CFLs are required to be sent to a registered recycling facility under the current regulatory regime to qualify for VEEC creation. Therefore, the inclusion of CFLs does not introduce any additional environmental pollution risk.

Energy Makeovers offers the following comments in response to the 2 issues raised in the consultation paper:

A. ESCs proposed new mandatory safety training (MST) framework to mitigate the risks of activity 21A.

Energy Makeovers strongly supports option 2: Put the onus on APs regarding training. As detailed above, the inclusion of CFLs under Activity 21A does not introduce any new safety risks that must be managed. However, Energy Makeovers does recognise and agree that safe mercury handling should be included in the training provided to all installers that undertake CFL, fluorescent tube and mercury vapour lamp replacements under Activities 21 and 34. Accordingly Energy Makeovers has included mercury handling training based on DHHS's mercury safety web page in its standard training package for all Activity 21 and 34 installers under its AS4801 compliant Safety Management System. Training will be delivered by our Safety Manager (ex Worksafe Inspector) and our Certificate 4 qualified Training Manager.

Energy Makeovers does acknowledge ESCs preference for option 3: Require refreshed and upgraded training through completion of specified MST courses or units. Whilst this is not Energy Makeovers preferred option, it is far superior to option 1: Require a licensed electrician. There are no valid reasons or benefits in requiring Activity 21A installers to hold an A grade electrician qualification and including this requirement merely adds unnecessary cost and resourcing constraint with the result that many Victorians will be denied opportunity to participate in 21A activities.

B. The transition arrangements which should be adopted which best manages safety risks after the consultation period and prior to implementation of the proposed ongoing new MST framework.

Should option 2 be implemented; transitional arrangements are unnecessary. Energy Makeovers proposes the following implementation arrangements for option 2:

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- APs intending to undertake 21A activities must demonstrate their mercury handling internal training materials and training methodology to the satisfaction of the ESC compliance team.
- APs must provide evidence of successful completion of mercury handling training in the form of an internal training record/certificate to ESC for each 21A installer that currently holds retrofit qualifications.
- ESC to include provision to upload mercury handling training evidence in the "Installers" section of the VEU registry.

Should option 3 be implemented; Energy Makeovers believes that option 2 should be adopted as the transitional arrangement in the period preceding the availability of the proposed new MST unit/course.

Please do not hesitate to contact me if you would like to discuss any matter raised herein.

Yours Sincerely



Bruce Page
Director