

3<sup>rd</sup> January 2019

Essential Services Commission  
VEET Division – 21A Training  
Level 37, 2 Lonsdale Street  
Melbourne, Victoria 3000  
[veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au)

To the VEET Division for 21A Training,

MAC Energy Efficiency Group (MAC) welcomes the opportunity to make a submission on the training and licensing requirements for Activity 21A as highlighted in the Consultation Paper distributed amongst stakeholders on the 7<sup>th</sup> December 2018.

MAC is an independent quality assurance business that provides energy efficiency compliance training, desktop/field audits and consulting under REES, VEU (formerly VEET), ESS and the EEIS. The team members of MAC have been involved with VEU compliance (in various capacities) since its inception in 2009. In this submission, MAC is addressing key aspects of how to manage and mitigate risks associated with Activity 21A: Incandescent GLS lamp or CFL replacement. The transition period unto which changes are implemented is also addressed.

Primarily, risks associated with installation and decommissioning can be isolated or eliminated through changing/creating a new mandatory safety training (MST) unit/course that addresses and prepares Installers looking to conduct Activity 21A. This is communicated by the ESC as Option 3.1. MAC is in agreeance that this is the best suited option from those proposed and has highlighted an additional Option which utilizes gap/bridging training (possibly online) that could prove to be a more cost-effective solution. MAC also agrees that the transition period arrangements highlighted in the Consultation Paper are adequate to implement changes and believe that it is imperative that decisions are implemented effectively and efficiently, on the first time around.

If you have any questions regarding this submission, please contact me on 1300 020 381.

Regards,

Andrew Shaw  
Quality Assurance Consultant  
MAC Energy Efficiency Group

## MST Framework for Managing Safety Risks for Activity 21A

As lighting technology continues to improve, so too must the regulations and activities consistent with the Victorian Energy Upgrades (VEU) program if energy savings are to continue to be effectively achieved. Whilst the installation of CFLs were able to create a substantial amount of deemed energy savings in comparison to their legacy-type counterparts, the competitiveness, affordability and availability of high efficiency LED GLS bulbs suitably presents a substantial opportunity for high-volume lighting upgrade activity across Victoria.

### *Risks*

The risks highlighted by the ESC Consultation Paper associate possibilities of:

- Cuts and eye injuries;
- Mercury pollution and exposure;
- Electrocutation, and;
- Improper decommissioning.

Mitigating these risks largely involves the use of correct PPE and holding relevant knowledge (via training) on industry best practice from start to finish of the upgrade. Whilst this may be commonly practiced by licensed electricians, the act of changing a light bulb is an activity that thousands of civilians undertake on a regular basis. If the inherent risks posed to these people were of a serious nature, Energy Safe Victoria (ESV) would likely take steps to mitigate these, however, as stated, the opinion of the ESV is that the risks posed from the replacement of CFLs do not require a licensed electrician in order to be avoided.

### *Considered Options*

MAC supports the ESC's view that Option 3.1 "...provides the most comprehensive, proportional and flexible approach to manage the safety risks associated with the replacement of CFLs." This is due to the omission of Option 1 (as per above), and that Option 2 tends to rely on too many moving parts that have the ability to produce highly varying control measures and training systems. A central, regulated training program steered by relevant parties will ensure that instances of non-compliance are monitored, and that best practice is being implemented throughout the activity.

With respect to the impact to activities (such as external windows, shower roses and weather sealing), MAC believes a cut-off date is the best option for implementation. This could be delivered in a way such as all installers up to the 1<sup>st</sup> of July 2019 (or from whichever date the training becomes effective) that have already completed their relevant MST units will continue to be Approved Installers, however, they will only be approved under those activities. If they wish to complete Activity 21A, they would need to undertake the newly updated unit(s) from the 1st of July 2019. As Installers conducting activities 13, 14, 15(A, B, C, E, F, G, H), 17, 21B and 26 all require the same set of MST units from Groups A, B and C, so the approval process will not be altered, just the criterion specifically associated with APs aiming to conduct themselves in Activity 21A.

### *Alternative Options*

Option 3.2 does not solely provide a solution as robust as Option 3.1, however could potentially be considered if it is implemented as a hybrid of 3.1 and 3.2 (aka Option 3.3). Similar to having a 21A specific module, it would involve offering 'gap training' via a registered training organisation (RTO). An example of where this has been used is with recent changes to battery installation training by the Clean Energy Council (CEC). If Installers have completed certain training units, they may be eligible to complete online gap training through the Holmesglen Institute (refer to the link below for information on how the CEC has structured this):

<https://www.solaraccreditation.com.au/installers/becoming-accredited/battery-storage-endorsement.html>

This method will mean that Installers don't need to sit all training again, as would be the case above; it would solely be about re-sitting training on impacted areas. This could prove to be a much more cost-effective option and reduce the barriers to entry for conducting upgrades under Activity 21A. It would still be critical for the ESC to steer the process to ensure that all requirements are met satisfactorily.

### Transitional Arrangements

As Option 3.1 (or alternative Option 3.3 proposed) are centered around ensuring safety and compliance by introducing amended/new MST units or gap training, it is intuitive to suggest that until the new certification is available for Installers to uptake, the use of licensed electricians is held mandatory when undertaking Activity 21A. This will ensure that identified risks continue to be mitigated as Installers will remain compliant as per their Licensing requirements, and risk of license loss for non-compliant works will remain prevalent.

MAC agrees that the timeframe of a 1<sup>st</sup> of July 2019 implementation date for a new/updated MST unit/course is reasonable, considering the number of stakeholders (and steering committee) that will need to be consulted to provide feedback on the updated training after the initial consultation process is completed. MAC believes that although the less downtime the better, it is vital that the change process is completed dutifully, effectively and efficiently.