Activity 21A training and licensing requirements



Information for program participants

12 February 2019







We have finalised our training and licensing requirements for incandescent GLS or compact fluorescent lamp (CFL) replacement activities (activity 21A).

From 12 February 2019, licensed electricians will need to be involved in all stages of this activity. Accredited Persons will need to provide appropriate training to minimise safety risks associated with the replacement of CFLs on installers and consumers.

Stakeholders involved in activity 21A installations should review the updated stakeholder documents to understand and implement this requirement.

Requirements for accredited persons under activity 21A

Accredited persons must:

- submit evidence to us that the installers they use for activity 21A are licensed electricians
- not submit Victorian energy efficiency certificate (VEEC) creation claims until we have reviewed and approved these installers and added them to our database
- provide installers with necessary information, instruction and training required to manage any
 risks associated with the replacement of CFLs, in particular, the mercury risks¹
- provide evidence of their training program regarding the mercury risks and spillages upon our request.

¹ For information on mitigating risks associated with mercury, please see https://www2.health.vic.gov.au/public-health/environmental-health-in-the-home/mercury-spills-and-safe-clean-up





Review our updated Space Conditioning, Shower Rose and Incandescent Lighting Activity Guide for more information. This guide is available at www.esc.vic.gov.au/space-conditioning-shower-rose-and-incandescent-lighting-activities

Stakeholder feedback

We recently undertook a public consultation on the training and licensing requirements for installers undertaking the replacement of CFLs and halogen lamps (activity 21A) under the Victorian Energy Upgrades (VEU) program.

We consulted with industry as part of our review to better understand their views on appropriate regulatory measures to safeguard against:

- electrical risks (electrocution)
- physical risks (cuts, grazes, eye injuries, and etc.), and
- long term toxicity risks (mercury exposure).

Stakeholders' submissions

The majority of stakeholders' submissions recommend the use of licensed electricians as the preferred option to mitigate safety risks and to ensure the integrity of the program, rather than putting the onus on APs to deliver their own training to installers or modifying our mandatory safety training (MST) requirements.

The arguments presented to support the use of licensed electricians are:

- 1. Licensed electricians are better able to address safety risks associated with the replacement of CFLs, including mercury spillage, electrocution and risk of cuts and eye injuries.
- 2. The activity of replacing CFLs may be perceived to be simple; however, the magnitude of scale and volume warrants the use of licensed electricians to manage various risk scenarios and implications.
- 3. The installations have better warranty when the work is performed by a licensed electrician, minimising risks to consumers and their properties.

Stakeholders acknowledged the use of licensed electricians may impose a cost on the industry; however, the majority of stakeholders making a submission held the view that the cost was justified to ensure the safety of energy consumers and installers, and to uphold the integrity of the VEU program.





Our decision

Our requirements for installers undertaking installations under activity 21A of the VEU program are:-

- Installers must be licensed electricians registered with Energy Safe Victoria.
- Installers must have been provided training on how to deal with mercury risks and spillages (e.g. how to properly clean up after a breakage of a CFL lamp).

We have incorporated the views of the majority of stakeholders' submissions that a cautious approach to mitigating electrocution risks (of installers or energy consumers) is appropriate given the severity of its consequences. Given the anticipated volume and scale of this activity, it is likely that installers will be performing upgrades at a significant number of premises which poses electrocution risks (e.g. non-compliant wiring environments or faulty fittings). Licensed electricians are best positioned to identify and mitigate these risks and to communicate them to the consumers and/or relevant regulators.

This approach also addresses compliance concerns associated with use of a transient workforce, as per previous high volume rollout of lighting activities under the program. The use of licensed electricians protects the integrity of the program and helps ensure a high quality installation and customer experience, and importantly, the safety of installers and consumers.

The use of licensed electricians may not specifically address the mercury risks associated with CFL lamp breakage. To ensure these risks are appropriately managed, we have determined that the provision of training on the mercury risks and spillages by APs to installers provide a proportional and balanced approach to managing these risks.²

Where to get help

If you have any questions with respect to matters set out in this program update, please contact VEU Support on (03) 9032 1310 or veu@esc.vic.gov.au.

² Further information in relation to the disposal of mercury-containing lamps is available at http://www.environment.gov.au/protection/waste-resource-recovery/mercury-containing-lamps



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