



Essential Services Commission  
VEET Division – 21A Training  
Level 37  
2 Lonsdale St  
Melbourne VIC 3000  
10 January 2019  
Via email: [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au)

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

Thank you for the opportunity to respond regarding TRAINING AND LICENSING REQUIREMENTS FOR ACTIVITY 21A

ESC has considered the following risks associated with activity 21A when determining which training or licensing requirements to implement:

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).

ESC has also provided 3 options.

Option 1: Require a licensed electrician

Option 2: Put the onus on APs regarding training

Option 3: Require refreshed and upgraded training through completion of specified MST courses or units

Looking at the fact that having Licensed electrician may impose a disproportionate cost on industry if implemented, and ESC's position is also informed by advice from ESV on the issue. Auspro Group strongly supports option 2 (2.1 & 2.2) : Put the onus on APs regarding training.



We believed that introduction of 21A creates more of a compliance challenge than safety challenges. We have been installing CFL's in the past and we as AP's managed the safety risk appropriately. Recognizing the need for greater safety training we have incorporated the recommended training based on DHHS's in our induction

Auspro Group doesn't believe option 3.1 is going to add much value apart from ticking the boxes, this can be easily covered by the AP's during training and a separate unit is unnecessary.

**Transition arrangements that should be adopted for this period.**

If the option 2 (2.1 & 2.2) is acceptable, then the transitional arrangements are unnecessary.

If the option 3.1 is implemented, then the transitional arrangements should be from a future date and retro-fitters should be allowed to conduct installation until such date. i.e. option 2 should be implemented until such date.

Please do not hesitate to contact me on 0404721948 if you would like to discuss any matter raised herein.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Chirag Desai".

Chirag Desai

CEO