

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

Date; 11<sup>th</sup> Jan 2019

**Subject: Re-Consultation: Training and licensing requirements for activity 21A**

Dear Scheme administrator,

Thanks for giving us the opportunity to provide our recommendation on training and licensing requirement for 21A and decommissioning of CFL lamps.

We have installed approx. 293,000 globes under the scheme. We recommend the option 2 would be the suitable and practical option in terms of training and process control.

Since the reapproval of 21A under 2018 regulation we have installed only 7000 globes due the electrician shortage in the market, most of the electrician are busy with the solar installation, which is big hurdle for achieving our forwards and impacting on our business viability. Further the risk associates with the activity 21A installation remain same either the activity being done by qualified retrofitters or electricians.

As we got reapproval of 21A under 2018 regulation, we have revised our training material and all installer are required to attend the training before starting the installation.

Regarding the lamp **breakage**, we have installed over 293,000 globes and we have not been reported any serious complaint about the globe breakage at customer premises, therefore we are confident that our installer will follow the procedure and will avoid any lamp breakage incident, if in case that would happen in future they are trained to conduct cleanup process as per the guide line define in our internal training material. Further when installer remove incandescent / halogen globes, they are required to hold the globe from the glass body where as CFL have non-conductor plastic/ceramic body so the possibly of breakage of CFL is very low as compare to the incandescent / halogen bulb that have been done in the past. So, revising of MST training and inclusion or electrician doesn't make any difference in term of the risk.

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Regarding mercury, CFL globes have very nominal amount of mercury as compare to tube light High bays and flood lights, we had removed thousands of mercury contained product and electricians have never come up about any issue related with the mercury as the quantity itself is very nominal in these product further they have not received any training from ESV for handling mercury contained product. As we have revised our internal training now every installer must need to familiarize themselves for taking precautionary measures and corrective action in case of mercury expose to the environment.

Regarding Electrocution, All our retrofit installer are trained and they know that if any hazard exposed for electrocution they are not allowed to touch that fitting and leave for electrician to resolve under ESV compliance, further replacing incandescent globes were more risky than changing CFL globes due to the fact the base of incandescent made of metal further if incandescent /halogen globes get broken the terminal get expose, whereas the base of the LED and CFL bulb are made of non-conductor material and in case if they get broken the electric terminal are locate with in the assembly body for the CFL/LED which is cover with non-conductor material. So, the chances of electrocution is very unlikely and does not required electrician for installation and does not required new MST for it.

For recycling of mercury contained product, as we are in the scheme since 2011, all our product are getting recycled from EPA approved recycler, further we have added in our training material that the CFL globes for activity 21A will be transport form customer premises to our warehouse in a box rather than in a bag to avoid any possible cause of CFL breakage during transportation, so the possibility of mercury pollution is highly unlikely as we are already following the recycling procedure.

Therefore, we recommend for option 2 that Aps should provide training to their installer. Should you need any further consultation and information, we would be please to provide.

Many Thanks

Aussie Greenmarks Team