

11 January 2019  
Essential Services Commission  
VEET Division – 21A Training  
Level 37  
2 Lonsdale St  
Melbourne VIC 3000

By Email: [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au)

Dear Sir/Madam

## **TRAINING AND LICENSING REQUIREMENTS FOR ACTIVITY 21A**

Please find our response to your Consultation Paper regards the above, dated 7 December 2018.

### **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.

**Comment:** After many years of handling glass enclosed globes, we believe we have an adequate record and good training for our installers to avoid injuries of this nature. We have not had an incident since the beginning of the scheme, and believe halogen lights would pose a higher threat, due to their age.

2. If a CFL is broken during its replacement, small amounts of mercury may be released, with consequential risks to installers and residents.

**Comment:** We do not believe that electricians are trained for such incidents, and believe that adequately trained installers would have a better impact in avoiding and handling such situations.

3. The replacement of broken CFLs may also pose electrical risks (electrocution).

**Comment:** We do not believe any significant risk of electrocution as the electrical terminals of CFLs are embedded deep in the base and are not exposed if the glass breaks. We believe simple safety training would eliminate any risk.

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).

**Comment:** 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.

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

Easy Being Green believe that option 2 is the safest measure to mitigate the risks of Activity 21A: The onus on AP's should be put on AP's regarding training.

We do not believe the inclusion of CFLs under Activity 21A introduces any new safety risks that must be managed. However we do recognise and agree that safe mercury handling should be included in the training provided to all installers that undertake CFL replacements under Activities 21A.

**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.**

Easy Being Green believes that should option 2 be implemented; transitional arrangements are unnecessary. We propose the following implementation arrangements for option 2:

- APs intending to undertake 21A activities must demonstrate their mercury handling in their 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 should include a provision to upload mercury handling training evidence in the "Installers" section of the VEU registry.

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

Thankyou for providing the opportunity for Easy Being Green and other AP's to provide a response and hope it may help in a smoother transition.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Andrew Randall".

Andrew Randall  
Managing Director  
Easy Being Green