

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

08.01.2019

Dear Sir/ Madam

RE: Training and Licensing Requirement for Activity 21A: Consultation Paper

Green Business Audit & Training, Registered Training Organisation No 40352, is authorised by the Australian Skills Quality Authority to deliver the qualification 22311VIC Retrofitting for energy and water efficiency. As Australia's largest and most experienced RTO in the delivery of this qualification, we are extremely well placed to provide consultation on the proposed changes to the training and licensing requirements for activity 21A under the VEET Scheme.

GBAT commenced delivery of this qualification in its earlier format in June 2011 and is the only RTO in Australia to consistently deliver the qualification in all its accredited versions since that time. We have successfully graduated close to 3500 students in this qualification. Through our CEO Steve Kostoff and Quality and Training Manager Caz Saunders, we participated on the Course Review Panel in 2011 which updated the qualification in early 2012. We participated again on the Course Reaccreditation Panel of 2015. This work saw the Course reaccredited in Jan 2016 as 22311VIC with new unit codes and learning content, and it was subsequently listed as fulfilling the mandatory safety training requirements for 21A products. Being the sole RTO delivering the qualification at the time, GBAT was the only RTO consulted by the Curriculum Manager in the mid cycle accreditation review in mid-2018, when again we provided valuable feedback on the validity and currency of the course content.

GBAT's record of quality training delivery is second to none in this field, and has been recognised as such

in being awarded the Australian Training Awards Skills for Sustainability Educational Institution Award in 2013. We have maintained a 100% compliance record on audit by the National Regulator ASQA.

GBAT is confident that since January 2016, the overwhelming majority of VEET Scheme Retrofitters installing products under 21A have received their training through our RTO. There were no other RTOs authorised to deliver this qualification in Australia between early 2016 and November 2018.

We note the Consultation Paper outlines the following risks that are considered to be associated with activity 21A:

- 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).*

We also note Option 3.1 of the Consultation Paper outlines a requirement for refreshed and upgraded training through completion of specified MST courses or unit, namely

- 3.1. Initiate a process to formally change and upgrade the VU21858 unit (in the 2311VIC course) to include training addressing risks of CFL replacements, and require installers to achieve the new / upgraded unit from a future date.*

GBAT is mindful of its legal obligations to the Scheme, our students, our clients, and our regulatory body. We are acutely aware of our responsibilities in delivering quality training in the occupational health and safety curriculum, given the importance of the safety of our graduates in their workplaces and also the public to whom they provide a service. Further, the legislated *Standards for Registered Training Organisations* require us to ensure our delivery meets such industry requirements.

Since 2011 GBAT has included in its delivery of 2231VIC training and assessment on the topic of hazards, risks and controls associated with the handling and installation of CFLs, including all four of the identified risks outlined above.

All of our students have been provided with

- Safety Data Sheets outlining hazards and risks associated with exposure to mercury
- learning content on safety in handling CFLs and appropriate PPE to use to prevent cuts and damage to eyes
- learning content on what to do if a CFL breaks and exposes people to the minute amount of mercury it contains
- learning content on the avoidance of electric shock when installing/ decommissioning globes
- learning content on appropriate disposal of CFLs due to the risk of environmental pollution

Importantly, all of our students have had their competency in the knowledge and skills around the identification and management of these risks assessed formally through the completion of assessments, both practical and written, on these topics. These assessments have been validated by industry.

Green Business Audit & Training is extremely confident that our determination of student competency in these topics has been both thorough and valid.

It is our position that all students who have been issued the 22311VIC qualification by Green Business Audit & Training have already met competency requirements in the management of hazards that the proposed Option 3.1 addresses.

In light of this, we believe it is unnecessary, costly and in fact burdensome to require our students to update their qualifications.

We have no issue with the course content of the 22311VIC qualification being updated to expressly cover these topics, and as always we are ready and willing to provide our considerable expertise in this regard.

If such a course update occurs in the future, we respectfully request that, should you determine that you require Installers of products under 21A to update their qualifications, **then any person holding a valid Statement of Attainment issued by Green Business Audit & Training is exempted from doing so**, saving them unnecessary costs.

Given the overwhelming majority of students who completed the 22311VIC qualification since its inception in early 2016 and end of 2018 did so with us, this proposed exemption for our graduates would mean the vast majority of installers currently employed with Approved Providers would avoid unnecessary costs.

Of course, we cannot speak to the industry currency, validity of training and assessment procedures or regulatory compliance of any other RTO delivering of this qualification.

We are available to discuss the above and provide any additional information you may require.

Yours Sincerely



Steve Kostoff
CEO
Green Business Audit & Training
RTO No 40352