

Sent: Friday, 9 June 2023 12:03 PM
To: ESPolicy
Subject: Electrical Safety Act 2002 review feedback

Section 3.1

I would strongly recommend against option 2 as the chosen option.

If the primary advantage of Option 2 is "increased scope of work", then the complete focus is wrong.

We are all well aware the ETU controls the ESO narrative, so it might already be a fait accompli, but requiring a licensed electrician to connect solar PV in domestic (or commercial) settings is just "jobs for the boys". It offers no safety benefits to the greater community. Education is the key, always has been and always will be.

Section 3.2

If the main advantages of Option 2 and 3 are "increased work opportunities", then the complete focus is wrong.

Option 4 is the only viable option here.

The ESO is well aware of what forums to place information and ads that will reach the "right" people to target for a campaign.

The main goals with either section should be to reduce the risk to the community, not get jobs for the boys as the ETU primarily seeks.

In every industry, the act of creating a "minimum standard" has all the good intentions, but in real-world conditions, this "minimum standard" turns into the final goal rather than a starting point for workers "short of time" or "under the pump". Education of best practice is the only way.

The costs to the industry to train more "licensed" electrical workers for the purpose of installing simple ELV systems are prohibitive and a great burden on ECs, who are already feeling the impacts of dramatically increased material and wage costs.

Instead of adding ELV-style equipment to the definition of electrical equipment and electrical installations, create a new section with relevant standards, guidelines and COPs specifically for ELV. A simple TAFE course with RPL ability would mitigate the ESOs duty of care obligations.

I cannot disagree more with recommendations 5, 6, 7, 17a and 17c.

Section 3.3

Option 3 is the only viable option.

Option 2 assumes all "licensed electrical workers" know about and are comfortable working on electrical motors in the voltage ranges you have specified. This is most definitely not the case. To keep risk levels low, an awareness and education campaign is the only option. Combine this with a simple TAFE course specifically targeted at EV motor maintenance in the form of restricted electrical licence.

Option 2 is, once again, jobs for the boys, and the primary goal is increased scope of work. Not an option.

Requiring a licenced electrical worker to be onsite at the vehicle mechanics workshop is cost prohibitive and provides little, if any, benefit to the greater community in the form of reduced risks.

Many, if not all, EV workshops understand electric motors in EVs better than some "licensed electrical worker".

5. If a licensing framework was introduced:

a. Should any specific type of vehicle be excluded for the requirement (e.g., motorcycles, cars, buses, trucks)? If so, what are they and why?

Yes, exclude motorcycles and cars.

b. Is a restricted licence (specified training) or full licence (full apprenticeship) suitable? If so, why?

A restricted licence to work on trucks and buses would be beneficial.

c. Should the licence type be determined based on the type of vehicle? If so, what would you suggest and why?

Only trucks and busses need to be a restricted electrical licensee.

d. What types of work or occupations should be excluded from a licensing requirement? Or alternatively, what types of work or occupations should have specific licensing requirements (e.g., on-road works, general maintenance and check-ups, and/or removal and disposal)?

For cars and motorcycles, no restrictions and all types of work are permitted.

For trucks and busses, exclude removal and replacements, general maintenance and check-ups (all done via computer nowadays).

e. Are there any elements under the Act which should not apply? Which sections and why?

With almost all diagnostics being carried out by onboard computers in EVs, there should be no restriction on who does what on a car or motorcycle.

f. Are there situations in which a disconnect and connect restricted licence for performing work on non-propulsion components of a vehicle would be appropriate?

No, it's plug n play.

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Kind regards,

