

Monday 3<sup>rd</sup> July, 2023

Re: Submission on Review of *Queensland Electrical Safety Act 2002*

Thank you for the opportunity to provide feedback on the proposed recommendations and priorities in the Review of *Queensland Electrical Safety Act 2002*.

At the outset, I would like to highlight the potential overlap between this Review and the *Draft Queensland Government E-Products Action Plan 2023-2033*. In that Review, the Queensland Government, Department of Environment and Science is undertaking to ensure Queensland is a zero-waste society, where waste is avoided, reused and recycled to the greatest extent possible. The objective of maximising waste avoidance, reduction, reuse, repair and recycling of products is both necessary and admirable. The aim of the Queensland Government is to facilitate reuse of among a range of broad range of products, but particularly relevant to this submission is the goal of facilitating reuse of our household electrical goods and devices.

I am an Australian Research Council Future Fellow, Professor of Law with Griffith University and Chair of the [Australian Repair Network](#). (This submission is made on behalf of and with the support of the members of the Steering Committee of the Australian Repair Network.) We provide support and training to the network of over 100 Repair Cafes in Australia as well as engage and work on repair barriers and enablers in industries such as consumer electronics, automotive, agricultural and medical device repair. My research on the Right to Repair is currently funded by a 4-year Australian Research Council Future Fellow Grant and in this research, I am examining a range of barriers and enablers of repair through a legal and regulatory lens. These include barriers such as intellectual property, consumer and competition law as well as range of responses that enable repair such as such as grass root community repair initiatives (eg Repair Cafes), repair skills shortages and repair incentives such as government repair rebates, repairability start ratings and Right to Repair legislation from different countries.

While this feedback on the Recommendations of the Draft Plan addresses some specific recommendations, I would be more than happy to provide further details about the challenge that the current provisions of the *Queensland Electrical Safety Act 2002* poses to the repair of electrical devices and goods (particularly those small household appliances) owned by Queenslanders.

## **Why is Queensland out of step with the rest of Australia when it comes to electrical repairs?**

One of the biggest challenges in repairing and the reuse of electrical goods, devices and e-products in Queensland is the fact that, “*All repairs to electrical equipment in Queensland must be conducted or supervised by a person holding an applicable electrical work license. All electrical work is regulated under the Queensland Electrical Safety Act 2002, Electrical Safety Regulation 2013, Electrical Licensing Eligibility Guide (March 2021) and the Electrical Safety Code of Practice 2021.*”

This means that any Queenslander who has a broken kettle, microwave or toothbrush or any small electrical appliance in their home or business really has no option if that product stops working, other than to throw that product away as e-waste. Many Queenslanders have complained that once an e-product stops working it is almost impossible to have that product repaired. Even if one attempts to engage a licensed electrician to inspect, find the fault and possibility repair the e-product, the call-out fee of that licensed electrician (if you can find one who is willing to come out to your home) almost always exceeds the overall replacement cost of the household appliance. For example, no-one would call out an electrician to have a kettle or toaster or microwave repaired so these products go straight into landfill unnecessarily. This is similarly the case with larger household appliances such as washing machines, refrigerators and dishwashers.

With respect to smaller household e-products, one viable alternative that is currently not available to Queenslanders (but is available to Australians in Victoria, Tasmania, Australian Capital Territory, West Australia, New South Wales and South Australia), is that broken e-products could be taken to one of Queensland’s 14 Repair cafes that are operating in and around the south-east corner of Queensland. However, the requirement that *all repairs to electrical equipment in Queensland must be conducted or supervised by a person holding an applicable electrical work license* prevents simple repairs, such as the replacement of a frayed cord or the replacement of a simple fuse or bulb, from being conducted. The consequence of which is that more household appliances and e-products are more likely to be disposed of in Queensland (rather than repaired) than any other State or Territory in Australia. A timely example of the impact this has upon Repair Café’s operation is shown in the Instagram post to its local community by the Sandgate Repair Café on Saturday 15 April 2023.



I have recently spoken with the Queensland’s Men’s Shed Association about potential future collaborations with our Repair Café network, who have also acknowledged that repairers that operate from Men’s Sheds in Queensland face similar challenges in conducting repair of e-products from the legislative requirement that *all repairs to electrical equipment in Queensland must be conducted or supervised by a person holding an applicable electrical work licence*. This is despite the fact that they are highly skilled and experienced.

Australia has over 100 Repair cafés that operate in the community. where volunteers come together to fix or repair things that are broken. The repair of e-products, particularly household e-products, is always in high demand at Repair Cafes. Where there is a licenced electrician, high numbers of e-products are able to be repaired, tested and tagged and returned to the owners and kept in use. This not only saves waste but brings a lot of satisfaction and sometimes joy to the owners of those products who can avoid not only throwing them away but also wasting money by way of replacement. However, in south-east Queensland there are only a few retired licenced electricians who are available to the 14 Repair Cafes, often meaning that even though those repair services are in high demand, the services will often have to be cancelled or limited. This is resulting in a huge amount of electrical products ending up going into our waste stream, unnecessarily.

Queensland Repair cafes, with appropriating skilled repairers, could provide a sustainable repair service for smaller e-products if they were allowed to conduct repairs as their interstate counterparts are able to. This would not provide any additional safety risk – as the lack of evidence from other Australian States and Territories on injuries from small appliance repair has shown.

The draft E-Products Action plan itself, at p17, identified that “Queensland stakeholders identified that two of the main barriers to repairing e-products are... access to appropriate repair facilities as well as “regulations and legislation”. Bringing the regulation of electrical repair into line with the rest of Australia and combining this with increasing the number of Repair Cafes, would go a long way in addressing the two barriers identified.

Queensland’s approach to electrical repair of e-products is out of step when compared to its interstate counterparts. We agree that there appears no sound reason why Queensland should be out of step with the rest of Australia State and Territory whose electrical regulators have confirmed that *‘it is not illegal for a person, who is unlicensed, to repair low-voltage household appliances with a cord and plug in Victoria, Tasmania, Australian Capital Territory, West Australia, New South Wales and South Australia’*. (Info provided by Mend It Australia)

We strongly agree with the statement that “much can be done by the Queensland Government in partnership with other stakeholders to develop and operationalise circular economy policies and programs that enable and support greater attention to repair, reuse and durability for e-products. Community-led circularity for e-products should not be underestimated and should be supported” (p 18 Qld Govt E Products Draft Action Plan)

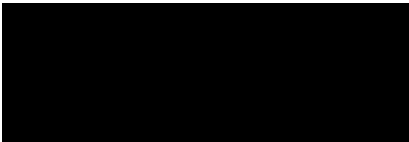
It is important to note that the range of electrical household products has grown exponentially since the passage of the Queensland *Electrical Safety Act* in 2002. The range of Internet of Things (IOT) devices in Queenslanders’ homes has also grown exponentially. It is for this reason that attention must be paid to the high volume of products that are battery powered and thus required to be charged. The inability to keep these products in use for longer is making a significant contribution to Queensland’s E-Waste. It is for this reason that our regulation around electrical product repairs needs to be brought into line with the rest of Australia.

**We also strongly support** the submission made by the Australian Automotive Aftermarket Association (AAAA) in opposing the fact that licensed electricians should be the only people able to work or repair E Vehicles in Queensland. Again this would put Queensland out of step with the rest of Australia. Highly skilled and appropriately trained automotive technicians and mechanics have more experience skill and knowledge on the repair of motor vehicles, including E Vehicles, than licensed electricians.

Please do not hesitate to contact me for further details or discussion.

Thank you again for this opportunity.

**Kind regards**



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