



**Continuing Professional Development Team  
Department of Environment, Land,  
Water and Planning  
Level 16, 150 Lonsdale Street, Melbourne  
Victoria 3003**

To the Continuing Professional Development Team,

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) thanks DELWP for the opportunity to comment on the consultation paper for Continuing Professional Development for Builders and Plumbers.

AIRAH is Australia's peak membership body for professionals and practitioners working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry. Our primary aim is to develop the competence and skills of industry practitioners so that they can better meet society's evolving health, safety and environmental demands, and the challenges of a rapidly changing world. AIRAH encourages world's best practice within the industry through continuing professional development, accreditation programs and technical publications.

AIRAH strongly supports the proposal for introducing continuing professional development (CPD) requirements into the Victorian building and plumbing industries. Our position is that CPD is necessary to create an Australian building industry that is highly skilled and professional, safe, sustainable and environmentally effective.

We are in favour of option 3: *Introduce mandatory CPD and require practitioners to undertake a mixture of compulsory and non-compulsory subjects.*

We also support technical compliance being prescribed as a compulsory subject, thereby requiring practitioners to undertake targeted training in aspects of the NCC and Australian Standards relevant to their class or category of work.

AIRAH is a committed supporter of state and territory regulations that require professional registration and CPD for engineers, such as those already in place in Queensland, and those being developed in Victoria. AIRAH's [ARPEng program](#) will support these registration schemes and help practitioners meet their CPD requirements.

As a leading provider of training in the HVAC&R industry, AIRAH has a clear view of the topics where there is most demand among practitioners. Foremost among these are NCC compliance (as indicated in the discussion paper), and fire safety measures.

As part of our professional development activities, AIRAH runs Section J face-to-face courses that are continually updated to reflect the latest version of the NCC. Between 80–150 people have attended this training each year over the past three years.

Last year AIRAH also ran a Section J Seminar Series comparing the 2016 code to the new 2019 code. More than 400 people attended this seminar series. This year, in response to the COVID-19 pandemic, the course has been developed and delivered as an online offering.

And starting in August, AIRAH is publishing a series of case studies and running a series of complementary webinars to improve compliance with changes to NCC Section J for improved energy efficiency in commercial buildings. This project is supported by the Australian Government Department of Industry, Science, Energy and Resources through the Climate Solutions Package.



All of these activities point to the ongoing need – and demand – for training in the NCC. We believe this kind of training would be suitable for compulsory CPD, as well as the courses being developed by the ABCB.

AIRAH also runs courses on Essential Safety Measures and Fire and Smoke Control Dampers. Based on industry response to these courses, we believe there is a need and a demand for this kind of training as well, and given the critical importance of the subject matter, it should be included in compulsory CPD.

At the trade level, [AIRAH advocates for CPD](#) for refrigeration and air conditioning (RAC) mechanics. This is especially important given Australia's HFC phase-down, which is driving a transition from traditional non-flammable, non-toxic refrigerants, to alternative refrigerants that are flammable, toxic, and sometimes operate at high pressure. Many HVAC&R technicians were not trained in these working fluids during their apprenticeship, so there is a clear need for ongoing training.

AIRAH believes that this should take the form of training by industry, as well as RTOs, which often has expertise in new technology and practices and is in a good position to develop and deliver “just-in-time” training.

For all kinds of training – for building practitioners and HVAC&R technicians – AIRAH believes that online courses should be considered as a valid option. This applies for both theoretical and practical hands-on training.

We look forward to reviewing the Regulatory Impact Statement (RIS) later this year and offer DELWP support in promoting the ongoing stakeholder consultation.

Regards,

A handwritten signature in black ink that reads 'Anthony Gleeson'.

Tony Gleeson, M.AIRAH  
AIRAH Chief Executive