



Regulatory impact submissions
Risk, Regulatory Planning and Policy
Energy Safe Victoria
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Victoria 8007

To the team at Energy Safe Victoria,

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) thanks ESV for the opportunity to comment on the Electrical Safety (Registration and Licensing) Regulations Discussion Paper.

In broad terms, AIRAH is a strong supporter of keeping regulations current and relevant for the industry, and we approve of the consultation process you are undertaking.

We also strongly support the proposal to introduce CPD into Victoria's electrical registration and licensing regulations. AIRAH's position is that CPD is necessary to create an Australian building industry that is highly skilled and professional, safe, sustainable and environmentally effective.

We support state and territory regulations that require professional registration and CPD for engineers – although it is worth noting that currently this is only in place for Queensland; Victoria and New South Wales are working on their regulations now. AIRAH's [ARPEng program](#), just launched, will support these registration schemes and help practitioners meet their CPD requirements.

Similarly, [AIRAH is advocating for CPD at the trade level](#) for refrigeration and air conditioning (RAC) mechanics.

In terms of the proposal to introduce CPD for electricians, AIRAH believes that lifting standards in one part of the building industry will encourage other sectors to follow suit. From an HVAC&R and building services perspective, we consider that this will be a significant benefit of a CPD scheme for electricians in Victoria (**Question 2.1**).

From our experience, although newsletters and other publications (including magazines, online resources and podcasts) as well as free industry events are valuable, they do not have the same impact as compulsory CPD (**Question 2.3**).

AIRAH mostly approves of the principals outlined for designing the CPD framework (**Question 2.11**). Two points we would raise, however, are:

- Accreditation processes for training should be assessed to check that they will not be too onerous for training developers and providers – in order to remain relevant, these materials will need to be updated frequently (**Question 2.13; Question 2.24**), and
- AIRAH believes that online training should be considered as a valid option, particularly for workers in remote areas (**Question 2.22**)

We believe the proposed structure of two streams of CPD, to maintain and develop skills, makes sense. For RAC mechanics with a restricted workers licence, this would mean completing 8 hours of training – most likely in the form of a one-day course, every five years, to maintain their licence.



As noted, any skills progression training would take place in the workers' primary trade and would be outside the jurisdiction of ESV and the scope of this proposal.

Given the large number of RAC mechanics who would be affected by the regulations, AIRAH recommends extensive consultation with these stakeholders. It is important that CPD is seen as a positive change for workers, rather than another financial and administrative burden. A simpler system – with the requirement to attend a one-day skills maintenance session, but without the need to document and track CPD points – may be more appropriate for restricted licence holders (**Question 2.16; Question 2.18; Question 2.19**).

Likewise, AIRAH believes it is vital to consult the community of RAC mechanics in Victoria for their views on the costs of CPD and how this might impact their income and businesses (**Questions 2.7–2.10**). One option that may be considered is building the cost of any compulsory “maintenance” training into the licence fee structure (**Question 2.20**).

Finally, given that electrical licensing is just one part of the RAC mechanic's job – and in many cases not the focus – it will be important to make this community aware of the new regulations. AIRAH unreservedly offers its assistance in promoting the public consultation on the proposed regulations.

Regards,

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AIRAH Chief Executive