

From: [REDACTED]
To: [Consultation](#)
Subject: Proposed regulatory changes within the act.
Date: Friday, 11 September 2020 7:47:04 AM

Dear Sir/Madam,

I work in an electrical engineering capacity and hold no electrical licensing.

[REDACTED] and have over 30 years experience in many LV systems including batteries.

It's not that I disagree with tightening of electrical licensing laws but the line between over-reach with regulation needs justification and published accountability.

If ESV were a business they would be required to state or publish a target benefit in numbers of electrical work place incidents based on the compliance measures. (and be held to it)

A price/performance ratio!

Currently the compliance costs in Australia are eroding our international competitive ness, Equipment from overseas turns up more and more under free trade agreements that meets none of our standards,

If this initiative equates to a saving to the community in public liability costs or others , then let the sectors that benefit from this contribute.

My suspicion is that no counter benefit will be seen due to the higher compliance cost and at some point people will just drop completely from the system.

The average Australian has not seen wage growth over a prolonged period and hence why superannuation has not performed as well as it was intended.

The inclusion of:

Ensuring that an electrician's licence is required for work on battery and generation systems that operate at extra low voltage (>12VDC and 1 Kilowatt Hour)

Is a very worrying sign.

Seriously 12V DC systems!

Are we talking about electrical safety now?

The average Flooded car battery is as dangerous as a VRLA battery system of 1000AH at 12V.

That inclusion aside, the current levels of training for technical people have created an electrical culture of compliance with no or little innovation. The basic physics of understanding electricity has been lost.

The mandating of standards like AS61439 Has made previously safe equipment, unsafe.

With the redesign of MCCs doubling their cost of manufacture and the loss of the flexibility in the design with mandatory type testing required.

Where is the benefit?

Where are the numbers to prove that the extra compliance costs meet a benefit?

It will not stop stupid people doing stupid things but it will drive down profit and hence employment within the customers that we work for.

ESV might grow as an organization but that is not necessarily a sign of success.

Many of the standards that are being adopted favor innovation overseas.

In general, the governments of the day need to find ways to provide initiatives that are not user funded but funded by the beneficiaries, this way the benefits will be transparent and the changes held accountable.

Yours Sincerely

[REDACTED]

Sent from my mobile