



15th March 2017



WE SPEAK FOR
AIR CONDITIONING

Queensland Building Plan
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AMCA QLD additional Submission to the Queensland Building Plan

Refrigeration and Airconditioning Technician Occupational Licensing

AMCA acknowledges the Palaszczuk Government's determination to strengthen occupational licensing as a commitment to the safety and protection of consumers and the public – a significantly different approach to the intent of the Newman government who had plans to dismantle key aspects of licensing for Refrigeration and Airconditioning.

AMCA in our submission presented on 28th February responded to a range of topics listed in the Queensland Building Plan, including support for Occupational Licensing for Mechanical Services Plumbers.

Another important part of our industry is the work done by Refrigeration and Air-conditioning Technicians. As this matter was not a specific subject raised in the Queensland Building Plan, AMCA has resolved to make this special submission in relation to the Occupational Licensing of Refrigeration and Airconditioning Technicians.

Why occupational certainty is important

It is critical that apprentices and qualified Technicians have certainty regarding the future of their chosen career-pathways and occupational licensing goes a long way towards confirming that certainty, as it underpins educational standards for highly technical trades such as Refrigeration and Airconditioning. In addition to providing career-path certainty, there is a recognisable benefit for consumers and the public as technical qualification standards are established within the licensing framework.

Occupational Licensing becomes a decision-making short-cut when consumers are required to make complex decisions where service, maintenance and installation of air conditioning services are required. This is one reason why AMCA strongly supports the government's ongoing determination to ensure we get the QBCC licensing arrangements right to provide a line of site regulatory regime and confidence in the community and the workforce that only appropriately qualified individuals do Refrigeration and Airconditioning work.

Why is this an important issue to address as an aspect of the Queensland Building Plan?

Refrigeration and Airconditioning Technicians are responsible for residential design as well



as construction, commissioning, maintenance and decommissioning and removal of domestic, commercial and industrial refrigeration systems, chilled water and refrigerated air conditioning systems, and ventilation systems. This work is required to be carried out in accordance with Queensland regulations including:

- Building Fire Safety Regulation 2008;
- Building Regulation 2006;
- Electrical Safety Regulation 2013;
- Electricity Regulation 2006;
- Environment Protection Regulation 2008;
- Work Health and Safety Regulation 2011; and
- Work Health and Safety (Codes of Practice) Notice 2011.

Refrigeration and Airconditioning Technicians must be engaged in certain aspects of mechanical trade work because of the need to comply with specific regulations to ensure public safety in scopes of work such as:

- Handling of flammable refrigerants;
- Handling of refrigerants with global warming and ozone depleting potential;
- Handling high pressure refrigerants;
- Ventilation requirements;
- Life Safety Systems which contribute to the Smoke Hazard Management requirements of a building; and
- Micro biological control in building water and air systems including, air conditioners and ducting, cooling towers, evaporative condensers, industrial fluid coolers and evaporative air conditioners.

Additionally Refrigeration and Airconditioning Technicians are currently required to:

- Hold the appropriate occupational licence and need to meet all qualification standards as required by National Construction Code and State regulations, including:
 1. Restricted electrical workers licence for refrigeration and airconditioning,
 2. Full Refrigeration and Airconditioning Licence issued by the Australian Refrigeration Council.
- Carry out the commissioning and balancing of conditioned air and chilled water systems.

The Queensland community must have confidence that all Refrigerant Handling arrangements, Ventilation systems, Life Safety Systems, and control of micro biological contaminants in air and water systems are designed, installed, maintained and commissioned by appropriately qualified and licensed individuals. Occupational licensing is a cornerstone of that confidence.

What are the benefits for Government?

- Consumer and public confidence increases because R&A/C work is only done by qualified individuals;

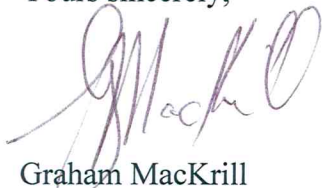
- Certainty in career-path opportunities for R&A/C Technicians leads to improvements in interest in R&A/C as a career of choice which should reduce the ongoing skills-shortage for the industry;
- The Workplace Health and Safety regime in the handling of all refrigerants is strengthened;
- Energy efficiency objectives (not previously referenced in this submission) as a whole of life benefit improves the energy performance of the built environment because skilled workers maintain the asset;
- Life Safety systems are maintained in accordance with the building owners' Fire Evacuation plan and appropriate Australian Standards;
- Ventilation systems are installed and maintained in accordance with appropriate Australian Standards; and
- Provision to industry of the workforce for the future, as there is confidence and certainty in training and education pathways. Outcomes at trade and post-trade levels for individuals become supported by an occupational licensing regime.

AMCA has for many years advocated that for effective Workplace Health and Safety, all refrigerant gases need to be placed within the remit of a single regulator. The industry requires certainty around the safe handling of all refrigerants. In terms of gas-handling regulations, consideration should be given to extending or enhancing the role of the Australian Refrigeration Council which operates under contractual arrangements to the Department of Environment and Heritage.

That is why AMCA advocates for:

- The Occupational Licensing of all Refrigeration and Airconditioning Technicians in Queensland;
- Reduction from \$3,300.00 to \$ zero for the QBCC definition of Regulated Building Work for R&A/C; and
- All workers and those who contract for Refrigeration and Airconditioning are appropriately qualified to do the work.

Yours sincerely,

A handwritten signature in purple ink, appearing to read 'G MacKrill', is written over a faint, larger version of the same signature.

Graham MacKrill
Executive Director