

14 March 2017

Queensland Building Plan
Department of Housing and Public Works
GPO Box 2457
CITY EAST BRISBANE QLD 4000

Comment on proposed Mechanical Services Licence in Qld

Dear Sir / Madam,

I am writing to you on behalf of the Australian Refrigeration Association. This is to express our concern in relation to the considerations of the Queensland government in relation to changes to the trade of Refrigeration Mechanic. It is our understanding that the revised Queensland model is based on the Victorian framework, which utilises plumbing as the industry base, rather than the more usual refrigeration and air conditioning sector

The ARA would strongly question the need for such a change when considering the scope of works for the proposed licence is already covered under the ARCTick national environmental licence. It is known that COAG previously identified and quantified the ARCTick Scheme as providing a reasonable net benefit when considering the current suite of RAC state related licence schemes.

It is the belief of the ARA that the preferred industry model is a **National Skills Based** model. There is currently significant industry collaboration and desire for an improved version of the current ARCTick licensing system. We would strongly suggest that it would be more prudent and cost effective for the Queensland Government to align itself with such a national skills based licensing and retention scheme in preference to following the Victorian example, which The ARA believe has failed to provide any significant industry or consumer benefit and has only contributed to ongoing fragmentation and deskilling of the refrigeration and air conditioning industry

It is also important to note that as a result of the amendments to the Montreal Protocol, signed Oct. 2016 in Kigali, Rwanda, Australia has agreed to a phase out the use of HFC refrigerants.

This has heralded the end of what was considered “safe” non-flammable refrigerants. The industry is now faced with a choice of using either flammable synthetic refrigerants, or natural refrigerants, some of which are also flammable.

These refrigerants require a skill set that the clear majority of tradespersons and apprentices currently working in the trade do not possess. The industry now has a massive education program that will be required to be undertaken for an estimated 95% of stakeholders in order to safely work with the new suite of flammable refrigerants.

It is the ARA’s opinion that amalgamation with another industry that is totally unfamiliar with the characteristics of refrigerants in general let alone the characteristics of flammable refrigerants will only serve to create unnecessary workplace and public safety risks.

In addition to this, better course curricula are needed to bring existing tradespersons up to the appropriate level in terms of risk management, handling of dangerous goods, new and newly relevant Australian Standards AS/NZS 5149, as well as installation/maintenance/service of new systems.

There are also questions about the impact on the way the industry currently operates (change to structure), duplication of licence types and training misalignment with the scope of works of the licence.

COAG reviewed all State licence schemes including the Victorian scheme as part of their regulatory impact statement into national licensing. During this review COAG made some criticisms of the Victorian scheme. The ARA is concerned these criticisms will be replicated in a Queensland system if it were to follow the flawed Victorian model.

We would also make the following comments regarding the proposal for your consideration:

A plumbing apprenticeship will not deliver the outcomes consistent with the scope of works of the licence. Rather the scope of works identified in Question 2 of your Factsheet 2 are more consistent with that of an RAC apprenticeship. Whilst there may appear to be some similarities with the plumbing industry (mechanical services stream) we are of the belief the skill sets are incompatible and therefore likely to deliver substandard outcomes.

A national license is more in line with the current policy position of COAG of mutual recognition. It would therefore seem unusual that the Victorian model has been chosen to develop around when Victoria is not contiguous with QLD and the opportunity for any practical application of mutual recognition is lost. This will limit labour mobility and impose additional direct and indirect costs.

The work described in the scope of works of the proposed licence is usually undertaken by Refrigeration and Air Conditioning (RAC) technicians, meaning the proposal is inconsistent with how the industry currently operates.

The Victorian competency requirements for mechanical services qualification are inadequate compared to the requirements of the two available refrigeration mechanics courses via the electrotechnology stream or the mechanical stream. This has already led to the confusing situation where those with the mechanical services licence in Victoria are still unable to legally perform service work on refrigeration systems. It would seem a perfect opportunity to align with the national skills based licence requirements to avoid this situation.

We also understand that the Victorian model was criticised by COAG in their recent RIS on national licencing i.e.; *“analysis of their requirements cannot be justified as being a necessary requirement to achieve the regulatory objective for the refrigeration and air conditioning occupations“* and also *” the scope of regulation being broader than may be*



necessary – for example, the requirement to hold a Mechanical services licence to obtain an endorsement for refrigeration and air conditioning in Victoria”.

The ARA strongly believe the Refrigeration and Air conditioning trade is a trade clearly in its own right, as such this proposal represents a fundamental shift from RAC to plumbing trades. We do not believe this is consistent with how the industry currently operates, and will result in further fragmentation of the trade, resulting in a lower skill set with a likely burden on both indirect and direct costs.

Further we would be supportive of COAG’s stated objective regarding reform as a desire to enhance labour mobility and remove unnecessary regulatory burden. It would seem that this proposal would not meet that test.

We look forward to your positive response and offer our assistance to ensure we have a positive outcome for industry, the regulators and the general public

Sincerely

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