



22 April 2020

ARMA – QLD RAC OCCUPATIONAL LICENCE STATEMENT OF POSITION

The Australian Refrigeration Mechanics Association (ARMA) as the only representative grassroots organisation for the HVAC&R sector and its members slams the Palaszczuk government for legislating the MEM30219 qualification – Certificate III in Engineering – Mechanical Trade. We draw your attention to a serious **RED FLAG** to our industries tradespeople and to consumers with the Palaszczuk government acceptance of the MEM30219 qualification for the RAC occupational license under guise of the new QBCC occupational licensing scheme. To emphasize our disdain for this qualification; it is in effect for metal, engineering, manufacturing, machinery and machine tools tradespeople; even a forklift truck driver and a weaving /knitting mechanic can obtain this qualification. In other words, this qualification is totally unacceptable, and doesn't meet the Federal Government Arctick licence as a recognised RAC qualification.

Below is inefficiency of this qualification and why it is not a trade recognised qualification within the HVAC&R industry:

- Lacks any core unit levels of RAC trade competencies
- Elective RAC competencies removed.
- Package rules designed for employment for fitters/welders/boilermakers
- Based on assumption that competency is gained with on and off the job learning
- Mapping capabilities can't be matched, is fraught with insufficient points value to achieve required outcomes for a RAC occupational licence

Our overwhelming concerns are the consumer's safety, and our own tradespeople from consequences an unqualified tradesperson is allowed to work outside of their scopes of work. We expressed loudly these exact specific concerns in our strong submissions and attendance to the Parliamentary Committee hearing, to reiterate the lack of training required for a HVAC&R qualification and working with toxic and flammable refrigerants.

Governments must learn from the erosion of the HVAC&R qualification where licence holders have minimal knowledge of natural vs synthetic refrigerants. A very tragic reminder is, the Rochester coronial investigation into the death of 2 tradespeople (1 a motor mechanic). Neither qualified refrigeration mechanics working outside their scopes of work, added car hydrocarbon air—conditioning refrigerant a mix of flammable and non-flammable refrigerants.

Over the years of government legislative changes to accommodate electrician and plumbers to work in our industry we have witnessed our small business operators decimated, because a lesser qualification in Certificate II Split Systems Arctick environmental license allowing peripheral trades to work outside of their scopes of work. It is history repeating itself and for this reason, we stand strong with our statement of position to voice enough of being "kicked in the guts" and blindsided, by a shameful government. to allow this MEM30219 to pass as a RAC occupational licence.

Our members demand a common-sense approach to abolish the MEM30219 in support of our HVAC&R tradespeople who are trained with over a 4-year apprenticeship with on the job- training in the required RAC scopes of work.

Take a moment to watch ARMA's video – "Who We Are & What We Do." Are we really going to allow unskilled workers under the MEM30219 training package to do this work?

<https://youtu.be/BiEIDUmX-Y4>

Appendix

Rochester coronial investigation releases findings

<https://www.hvacnews.com.au/news/rochester-coronial-investigation-releases-findings/>

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