

Hon Tim Pallas MP
Treasurer
Level 4
1 Treasury Place
East Melbourne Vic 3002

[REDACTED]

Dear Treasurer

Nation Wide Red-Tape Reduction; Occupational Licensing Reform.

I refer to the recent statement by The Federal Treasurer, Hon Josh Frydenberg in relation to the above.

Master Electricians Australia supports the Federal Treasurer's position and calls upon your state to support the Council of the Australian Federation (CAF) being tasked to facilitate this important red tape reduction as soon as possible.

Attached to this letter you will find each state and territory summary of all the relevant occupational and businesses licenses costs, duration and licensing authorities for the electrical contracting industry.

MEA position is the approach can be likened to the drivers' licenses system. An electrical license from one state is administered, authorised (in the originating state but recognised, accountable and terminable in all states in which work is completed.

MEA does recognise that there is a significant volume of work that needs to be done to ensure that obligations and enforcement activities apply all industry participants equally and that these sanctions are recognised Nationwide.

MEA believes this system, if properly implemented in a coordinated way across all states and territories will not impede any states ability to set and enforce quality, competence, or safety requirements.

MEA seeks a time to discuss your position and seek your support in achieving this important red tape reducing activity to assist workers and employers across the country deliver for the Australian economy.

Yours faithfully,

[REDACTED]

[REDACTED]

Chief Executive Officer

ACT

unrestricted electrician's licence (individual)	\$ 180.00	1 year	ACT Planning and Land Authority
unrestricted electrician's licence (individual)	\$ 380.00	3 year	ACT Planning and Land Authority
Security Employees	\$ 129.00	1 year	Office of Regulatory Services
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor's licence (individual)	\$ 180.00	1 year	ACT Planning and Land Authority
electrical contractor's licence (individual)	\$ 380.00	3 year	ACT Planning and Land Authority
Security Master	\$ 843.00	1 year	Office of Regulatory Services
Total	\$ 1,097.00		

NSW

Supervisor Certificate	\$ 132.00	3 year	NSW Fair Trading
Tradesman Certificate	\$ 75.00		NSW Fair Trading
Class 2 Electronic equipment installer	\$ 140.00	1 year	Security Industry Licensing Directorate
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor licence (Sole Trader)	\$ 173.00	1 year	NSW Fair Trading
electrical contractor licence (Sole Trader)	\$ 519.00	3 year	NSW Fair Trading
electrical contractor licence (company)	\$ 408.00	1 year	NSW Fair Trading
electrical contractor licence (company)	\$ 1,224.00	3 year	NSW Fair Trading
Master Licence (security) self-employed individual	\$ 560.00	5 year	Security Industry Licensing Directorate
Total	\$ 3,459.00		

Solar PV accreditation	\$ 190.00	1 year	
electrical contractor licence	\$ 419.00	1 year	Electrical workers and contractors licensing board
Total	\$ 909.00		

QLD

electrical work licence	\$ 82.90	5 years	Department of Justice and Attorney-General (QLD)
Fire Protection Occupational Licensing	\$ 121.65	1 year	QBCC
Security equipment installer	\$ 232.50	1 year	Office of Fair Trading (QLD)
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor licence	\$ 395.90	1 year	Department of Justice and Attorney-General (QLD)
QBCC trade contractor licence	\$ 571.20	1 year	QBCC
Security Firm Licence	\$ 955.20	1 year	Office of Fair Trading (QLD)
Total	\$ 2,587.35		

SA

electrical work licence	\$ 282.00	3 year	Office of Consumer and Business Affairs
Security Agent License Individual(employee)	\$ 341.00	1 Year	Office of Consumer and Business Affairs
Security agent licence (sole trader)	\$ 714.00	1 year	Office of Consumer and Business Affairs
Security agent licence (company)	\$ 933.00	1 Year	Office of Consumer and Business Affairs
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor licence	\$ 413.00	1 year	Office of Consumer and Business Affairs
Total	\$ 2,911.00		

TAS

Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Security License Employee	\$ 194.40	1 Year	
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor licence	\$ 534.60	1 year	Workplace Standards
Security License Business	\$ 737.10	1 Year	
Total	\$ 2,034.30		

VIC

Electricians licence	\$ 205.86	5 years	Energy Safe Victoria
Security adviser and security equipment installer (individual registration)	\$ 287.90	3 year	Vic Police Licensing & Regulation Division
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS
Solar PV accreditation	\$ 190.00	1 year	Clean Energy Council
electrical contractor licence	\$ 308.05	5 years	Energy Safe Victoria
Security adviser and security equipment installer (Business Registration - Sole Trader)	\$ 677.10	3 Year	
Security adviser and security equipment installer (Business Registration - Company)	\$ 1,146.30	3 Year	
Total	\$ 2,853.21		

WA

electrical work licence	\$ 97.00	1 year	Energy Safety
electrical work licence	\$ 485.00	5 years	Energy Safety
Security Installer Licence	\$208.00	3 years	Licensing Enforcement Division (WA Police)
Australian Cabler Registration	\$ 38.00	1 year	ASIAL, BRCA, FPAA, TITAB, ACRS Clean Energy Council
Solar PV accreditation	\$ 190.00	1 year	
electrical contractor licence	\$ 525.00	1 year	Energy Safety
Security Agent Licence	\$ 843.00	3 years	Licensing Enforcement Division (WA Police)
Total	\$ 2,386.00		



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Electricity Safety (Registration and Licensing) Regulations 2020

Submission



September 2020



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Introduction

Master Electricians Australia (MEA) is the trade association representing electrical contractors recognised by industry, government and the community as the electrical industry's leading business partner, knowledge source and advocate. Our website is

www.masterelectricians.com.au

Expected Outcomes

MEA supports the expected outcomes of the Regulations and highlights the once in 10 year opportunity to ensure the industry is prepared to meet the challenges of

- increasing energy consumption,
- provided in ever increasing sustainable manner and
- present new technical and safety challenges for the industry

at an ever-increasing pace. The objective to

- ensure that all electrical installation work is undertaken only by competent persons with up to date skills
- ensure that electrical inspection work and linework is being undertaken by competent persons with up to date skills
- recover the costs of regulating electricity safety in an efficient and equitable manner, while not undermining the achievement of safety objectives.

The Issues

The draft regulation outlines the following issues as being needed to be addressed.

- Introduction of Continuing Profession Development (CPD)
- Licensing of lineworkers
- Removing the requirement that an electrical contractor business supervisor or nominee must have completed a training course or have equivalent experience
- Considering the level of public liability insurance (PLI) required to be held by Registered Electrical Contractors (RECs)
- 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)
- Requiring currency of assessment as a condition of licence (e.g., must have passed the Licensed Electrician's Assessment (LEA) within last five years)
- Requiring "Fit and Proper person" test for LEI's
- Requiring qualification for Licensed Electrical Inspectors (LEIs)
- Using lineworkers in a significant outage event.



Introduction of Continuing Profession Development (CPD)

The case for CPD is well made out, and supported by MEA, in the regulatory impact statement(RIS) where it identifies

“There are constant changes in the field, including updated Standards and Regulations, improved safety practices, and new and emerging technologies. There is a risk that these are not being effectively relayed to electrical workers because there are no ongoing requirements for training. Investigation outcome reports identified that when interviewed, under caution³¹, as part of an investigation or during a site visit it is clear that workers are not generally aware of revisions to standards or may have forgotten the mandatory test requirements contained in legislation. When asked how they should test completed electrical work many do not exhibit a satisfactory knowledge of testing procedures and when asked to produce the latest addition of the wiring rules many do not even possess a copy.”

The principles outlined by the RIS state

- focusing on mandatory requirements and, where relevant, the development of skills relating to new technologies
- delivering the scheme efficiently, with no unnecessary costs
- integrating the scheme with existing regulatory processes and industry practices
- independent assessment of the scheme’s impact and performance
- compulsory training (as opposed to voluntary)
- competitive training provision where appropriate

MEA has reviewed the following options

Option 1: Continue with current licensing requirements with no CPD—this option represents the status quo. Currently there is no structured requirement for licensed electricity workers to maintain or develop their skills.

Option 2: Introduce mandatory requirements for skills maintenance—licensed workers would complete a refresher course of skills learnt in their original training, updated to current requirements. CPD for skills maintenance training would be required by 2023.

Option 3: Introduce mandatory requirements for skills maintenance and skills development, phased over time—licensed electrical workers would be required to complete both the skills maintenance requirements above, and a second round of skills maintenance and skills development after five years. A phased approach would see skills maintenance training required by 2023 and skills development training required by 2028.

Option 4: Introduce requirements for both skill maintenance and skills development components (full CPD) by 2023—this option is similar to the above option, however, skills maintenance training and skills development training would be introduced together, with both required by 2023.

MEA whilst recognising that the RIS has gone to some length to create a multi-criteria analysis (MCA) MEA believes that the cost impacts that have been estimated are underestimating the impact based on a poorly selected hourly rate and an estimation of lost revenue of employers.

However, based on the figures as they stand MEA would support option 3 with some significant caveats.

None of the options have considered or detailed any information concerning out of state CPD and the affect, or recognition that may well be attributed or used. The RIS does indicate that Tasmania has begun a CPD system which format is significantly different, but no less applicable or reliable than the RIS has highlighted. It is imperative that the RIS outcomes and the draft regulations have the ability to recognise, in full, CPD from other states.

A point that has not been raised in the RIS and may have been unavailable at time of publication is the Federal and State Treasurers intention to address interstate occupational licensing. In a letter we have written to all state treasurers including Hon Tim Pallas Treasurer of Victoria we have highlighted the following

- National occupational licensing approach can be likened to the drivers' licenses system. An electrical license from one state is administered, authorised (in the originating state) but recognised, accountable and terminable in all states in which work is completed
- there is a significant volume of work that needs to be done to ensure that obligations and enforcement activities apply all industry participants equally and that these sanctions are recognised Nationwide.
- MEA believes this system, if properly implemented in a coordinated way across all states and territories will not impede any states ability to set and enforce quality, competence, or safety requirements.

A copy of the letter to the Hon Tim Pallas is attached for your information and a link to the current CAF website for your information. [CAF Occupational Licensing](#)

MEA would highlight that CAF suggests that by recognising other state licensing and their CPD it will

- reduce red tape,
- costs,
- improve mobility of workers
- ensure that workers and contractors can be held to account
- maintain a level of quality and currency of practice.

MEA is concerned with an aspect of the RIS that only one formalised course, delivered face to face, has been proposed. MEA believe that this does not achieve an effective and state-wide applicable delivery model and that non accredited training and different training modalities must be incorporated into the model. By not doing so our previous position concerning the lack of recognition of interstate CPD and nonaccredited training, such as that of CPD in Tasmania, will add additional cost and complexity to the national system being sought by CAF. MEA is also concerned that rural, remote interstate workers and contractors will face difficulties. AN example can be seen with workers and contractors entering into the Western Australia market. Regularly it is reported by our members that lead times and available training spaces in rural remote, length and timing of the course can be significant effects and delays on projects.

Licensing of lineworkers'

RIS case for registering Lineworkers

Progression from a registration to a licensing system is intended to improve safety outcomes by enhancing the regulatory oversight and providing increased accountability and visibility of the workforce including mandating the minimum qualifications, training and experience required by lineworkers. Improved workforce data would:

- *enable ESV to better analyse potential trends and emerging safety risks affecting the workforce*
- *support improved professional standards*
- *assist in meeting community and stakeholder expectations of industry standards.*

Regulatory oversight and accountability will be improved by monitoring fraudulent or incompetent behaviour, requiring CPD (proposed) and improve contact with the lineworker.

MEA supports the licensing of lineworkers. Licensing of Lineworkers' does occur in most other states of Australia. The proposed licensing will assist regarding cross boarder recognition in times of disaster, out of state linesman assisting with natural disasters and events.

What this part of the RIS highlights again is the position of the CAF in national occupational licensing and the benefits of such systems whereby states do recognise and hold accountable practitioners operating on licenses from interstate. Again, we draw the comparison to Drivers licenses in Australia being issued by each state but the driver being accountable in each state and being punished by the relevant state in event of a breach.

Removing the requirement that an electrical contractor business supervisor or nominee must have completed a training course or have equivalent experience

The RIS states a justification of the following

"While it is important for governance and accountability reasons that ESV has the contact details of a person who is responsible for managing an electrical contracting business, it is not clear why the manager or nominee of a registered electrical contract business needs to complete a training course or be a person experienced in running an electrical contracting business. ESV believes these arrangements were originally designed to improve an electrician's business skills before they established an electrical contracting business." ...

"The removal of this requirement is the preferred option and is expected to result in regulatory savings of around \$16 million (PV) over the life of the Regulations, or around \$1.6 million (PV) annually. These cost savings result from removing the requirement to attend the course (\$295) over 40 hours (\$66.11 x 40 hours). Each year 675 people will no longer be required to undertake this course."

MEA strongly opposes the removal of this requirement for REC. The RIS has highlighted one reason for the initial introduction of this course however there are other reasons it was introduced including

- reducing the number of insolvencies which affect employees and suppliers
- ensuring consumers were protected by ensuring contractors were aware of their electrical and consumer obligations
- ensuring that contractors were aware of the workplace health and safety requirements as a PCBU.
- Ensuring legal obligation to the State government such as payroll tax and other office of revenue requirement were met.

The RIS considers that the internet being available means that a person will on their own initiative undertake the required professional development needed to run a business. To that end one could also say that if a person buys a copy of AS3000 from SAI Global then they should be able to be an electrician as long as they supply their name and address.

The availability of information does not equate to education, professionalism, and minimum quality of service. MEA considers this as a backward step. When combined with a lack of PLI these conditions will create an environment whereby uneducated and unscrupulous and unsafe operators will take advantage of consumers and workers and creates an industry culture of lowest cost. Lowest cost culture leads to a decline in safety, and safety is what ESV main purpose. Where other actions in this RIS are aimed at increasing safety and skill of workers ESV is taking a backward step in management skill and therefore a drop in what we would see as a leadership and safety culture of the industry. The RIS has also not included any cost in terms of business insolvencies and the effect that will have on the industry and ESV.

Considering the level of public liability insurance (PLI) required to be held by Registered Electrical Contractors (RECs)

The RIS states the following

Stakeholder consultation suggested retaining PLI coverage in the regulations and that the current \$5 million minimum was an appropriate level of insurance. ESV believes that a higher minimum cover amount would increase insurance premium costs more than risk mitigation would justify and a lower minimum coverage amount would expose licence holders to high claims (while such insurance events are low probability, they can be very high impact). ESV proposes to prescribe the insurance amount at \$5 million.

However, in Victoria, builders are not generally required to hold public liability insurance, except for two high-risk categories:

- *Builder – demolisher (low rise buildings, medium rise buildings and unlimited classes)*
- *Erector or supervisor (temporary structures).*

Under a Ministerial Order, plumbers are also required to hold public liability insurance. We understand that Queensland and Tasmania are the only other jurisdictions in Australia that make PLI compulsory for electricians, although it is encouraged throughout the industry.

MEA does not support the removal of the PLI requirement for REC's. Public Liability insurance is designed to cover legal fees and compensation costs if a customer, member of the public, or a supplier claims against a REC for injury or damage to their property as a result of alleged negligent business activities. The likelihood of a claim being made is unpredictable has the potential to be financially crippling to the business, as well as the other party. By removing this requirement an affected customer or consumer may well have the result of relying of Public Hospital and support services for an unspecified time. This increases the cost to the Taxpayer and Victorian Government. A claim that is covered will then be able to compensate a consumer or customer at a much-reduced cost to the Victorian Taxpayer.

MEA also can demonstrate that an increasing of PLI from \$5 million to \$10 million does not require a doubling of premium, in fact in some cases only an additional \$100 is required in some cases. MEA also points that in any commercial contract at present it is common that \$10 million is a requirement and is particularly used by the Victorian Government in many procurement tenders and contracts offered presently. It seems at odds then that a RIS by ESV would say that no insurance is necessary in such a high-risk industry.

MEA would also point to the global financial crisis of 2008 and the claims costs on PLI that have to date been associated with that year's event. According to APRA (the Australian Prudential Regulatory Authority) the claims cost for 2008 by underwritten year for Victoria alone stands at \$1.654 Billion dollars ([APRA claims data reports December 2018 Victoria](#))

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)

The RIS states

Correctly installed systems provide negligible risk. However, incorrect installation or faulty work can pose risks to consumers (low frequency but potentially catastrophic when they occur), particularly through fires caused by arcing. The current Regulations do not capture work on those parts of battery generation and storage systems that operate at extra low voltage. ESV is considering making it a requirement that a person who installs or carries out works on any parts of a battery or generation system that operates at extra low voltage (>12VDC and 1 Kilowatt hour) holds an electrician's licence.

ESV considers that energy storage batteries operating at extra low voltage (ELV) can pose a safety risk if not installed correctly. The Minister recommended that when the current Regulations are remade that ESV consider the cost and benefits of a licensing requirement for installing energy storage batteries that fall below the current threshold for licensing.

MEA agrees with the premise of the RIS however it will need to ensure that the unintended consequences do not result in other industries being caught having to do an apprenticeship or

that consumers are not allowed to continue to operate extra low voltage equipment that is not intended to be licenced.

MEA stresses that the extent of the legislation should identify clearly that it only refers to battery and generation where it is used to supply supplementary or standalone systems that are connected to an electrical installation. The Minister and the regulation must ensure that other applications such as caravanning, camping, auto electrics, smoke detectors, and security systems etc are not caught in the regulation making it either unworkable unenforceable or adding a huge cost the consumer that has not been contemplated in this RIS.

MEA supports this licensing regime based on the level of risk and quality of current installations and suggests that consideration be given to the total of the amount of generation or storage exceeds the current levels when linked in parallel.

MEA also believes the RIS has missed an important future development whereby currently PV is effectively licensed by the CEC. Given the length of time the regulation is to be enacted for we suggest that ESV consider whether or not an option for licensing PV and other forms of renewables should be available to the ESV depending on development within the Federal and State Governments and energy markets.

Also suggest looking into licensing of solar and batteries should CEC not be doing it.

Requiring currency of assessment as a condition of licence (e.g., must have passed the Licensed Electrician's Assessment (LEA) within last five years)

The RIS states

The most common pathway to obtaining an electrician's licence is to have completed a four-year contract of training as an electrician (e.g., an apprenticeship) that included at least 12 months' experience in carrying out electrical installation work. The person must also have satisfactorily completed the LEA conducted by ESV or by an approved body.

There is currently no time period or expiration attached to the LEA. In line with ensuring that skills and knowledge are kept up to date, ESV is considering whether to require a person applying for their electrician's licence to have completed their LEA in the last five years. The Wiring Rules change about every 5 years, as do other standards, so it is essential that the applicant is familiar with and tested on the current standards and rules. Similarly, other licence classes require an independent practical assessment prior to licence application, and the five-year requirement would also be applied to these applicants.

ESV considers that it is appropriate to require a person applying for all licence classes to have completed their respective independent practical assessment in the last five years (e.g., restricted electrical worker's licence (class 1) and electrical inspector's licence). In practice, this will require about 80 persons to undertake the LEA per annum. This is consistent with the rationale for CPD assessed above—skills currency is a foundation of electrical safety. It is also relevant to note that the Australian Skills Quality Authority (ASQA) prohibit the expiry of qualifications, so to ensure skills currency, current LEA assessments are considered necessary.

Costs for this proposal are based on direct course costs of \$544 and 7 hours of forgone income (\$66.11 per hours x 7) multiplied by a population of 80 persons per annum. Over a 10-year period this proposal will cost in the order of \$575,800 (PV), or \$57,000 (PV) annually.

MEA agrees that upon applying for a license that the LEA has been completed some time in the past 5 years for all classes of license. MEA however would raise other situations whereby this may or may not be applicable.

Where a LEA **should be required**

- tradesman returning to the trade after a career change who have not had recency of practice in the last 5 years
- Apprentices entering the trade
- Tradesman who have not satisfied their CPD requirement

Where LEA should **not be required**

- Interstate tradesman applying for a licence

Requiring a “fit and proper person test” for LEI’s

The RIS proposes to insert the test based on the following criteria for LEI’s

- the applicant has not complied with or has contravened a provision of the Act or Regulations
- the applicant has attempted to obtain a licence as an electrical worker by fraud, misrepresentation, or concealment of facts
- the applicant has been convicted of any offence involving fraud, dishonesty, drug trafficking or violence that was punishable by a term of imprisonment of six months or more
- the applicant has been negligent or incompetent, or was a party to any negligence or incompetence, in connection with the carrying out of electrical work
- the applicant has engaged in fraudulent conduct in the carrying out of electrical work.

MEA supports the inclusion of the test for LEI’s based on the current test applicable to other license holders and the significant responsibility they hold in the community for electrical safety.

Requiring qualification for Licensed Electrical Inspectors (LEIs)

The RIS states

Currently there is no specific requirement for prospective LEIs to complete any formal training or qualification. There is, however, a requirement for applicants to satisfactorily complete a practical assessment in electrical inspection work. ESV considers that this test is a valuable component of a person’s skills as a LEI. The current results of this assessment show a high failure rate, with less than a quarter of candidates successfully demonstrating the required skills and knowledge.

MEA supports the requirement of a qualification for LEI’s however would suggest that a multi-modality model and that various delivery models be investigated rather than purely class room based education. Given the geographical spread and impact upon the current inspectors to balance operational costs and revenue Vs time away from businesses will ensure smooth transition. Part time and after hours courses will also allow for current electricians to undertake

Using lineworkers in a significant outage event.

The RIS has described the need for an exemption of interstate lineworkers requirements a license in times as defined by the Regulations. The RIS states the following

Given that these Regulations propose to license lineworkers, it is important that interstate workers be permitted to work in Victoria for a Major Electricity Company (MEC) during a significant outage event for the duration of that event. A significant outage event is defined in the proposed Regulations to mean a loss of electricity supply to a significant number of Victorian customers caused by bushfires, storms, high winds, floods, and any other natural disaster or emergency. The MEC will decide when a significant event occurs. This proposal will proceed as an Order in Council Exemption that will complement the Regulations. This will provide a standing exemption for using interstate workers in these emergencies. A copy of the proposed Exemptions will be provided with the Regulations for public consultation....

Based on extensive consultation, ESV considers that:

- *the scope of linework for the purposes of licensing will include:*
 - *transmission networks: this involves electrical work on tower lines and overhead electric lines in the terminal stations. It also would include electrical assets associated with the electric lines with a nominal voltage exceeding 66 kV AC or 80 kV DC as well as aerial electric lines with nominal voltage of 66kV AC and being supported by the same structure that supports an aerial conductor with nominal voltage of 132kV AC or greater*
 - *distribution networks: this includes electrical work on conductors, underground cables and other electricity infrastructure equipment*
 - *traction networks: this includes installation of cables and traction equipment, poles on railway supply networks or tramway supply networks*
 - *some cable jointing work.*
- *that minimum qualifications are a Certificate III in ESI Power Systems, or equivalent.*
- *for international workers, the Offshore Technical Skills Record (OTSR) for the issue of a Supervised Workers Licence for Electricians, onshore experience and completed gap training in order to obtain an electrician's licence will be required.*
- *interstate lineworkers being more easily available to work in Victoria during significant outage events (proceeding as an Order in Council exemption).*

MEA supports the use of lineworkers in a significant outage event such as this years fires and floods. Lineworkers' from other states are mostly licensed which assists with the current proposal to license Victorian lineworkers.

This action highlights again the position of the CAF in national occupational licensing and the benefits of such systems whereby states do recognise and hold accountable practitioners operating on licenses from interstate. This will allow an increased speed and flexibility of response and a reduction in red tape for both Victoria and the supplying state.



Manager Policy and Advocacy