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General Manager of Risk, Regulatory Planning and Policy
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Att, [redacted]

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Business area EPBP
Phone direct
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Cc
Reference No. 00001

Date 22 May 2020

Subject: ESV RIS: EXTENDING THE PROHIBITION ON CERTAIN MODELS OF RCBOs

Dear [redacted]

ABB Australia thanks ESV for the opportunity to comment on the Extending the Prohibition on Certain Models of RCBO Regulatory Impact Statement – March 2020.

ABB is a global supplier/manufacturer of RCD products, including compact RCBOs and is considered one of the largest manufacturers of RCD products in the world. One of ABB's core values is the safety provided by our products to staff, consumers and installers around the world.

We have previously responded on 30th January 2020 to ESV's request for submissions in the preparation of Consultation RIS.

ABB supports the ongoing efforts to increase the protection provided by RCD products through the requirements of the Australian Wiring Rules AS/NZS 3000:2018 where the mandatory use of RCD's has been increased from previous editions.

The additional requirements outlined by the prohibition in Victoria has been considered by Standards Australia Technical Committee EL-004 in November 2016 and by the sub-committee of technical experts EL-004/09 in March 2017 with a view to modify the RCBO standard AS/NZS 61009. The resolution was to refer the proposed modification to the IEC Technical Committee TC-23 who are responsible for the standard IEC 61009 that the Australian standard is derived from. TC-23 rejected any need to amend the standard based upon no reported issues from any other jurisdictions and EL-004 supported this view by a majority decision of members.

ABB is concerned that having the Victorian jurisdiction out of step with the requirements of the Australian and international standards as well as other national jurisdictions creates a confusing scenario for industry. An RCBO that is accepted in a border town such as Albury would be unacceptable in the twin city of Wodonga. This will create a burden on installers, wholesalers and suppliers in administering these requirements.

ABB acknowledges that the increased use of RCD's due to standards requirements has seen a steady decrease in the number of fatalities caused by electrocution as published in the ERAC Electrical Fatal incident Data Report 2018-2019. For this reason ABB actively supports the increased requirements for RCD's through the standards process.

Some issues highlighted in many recent industry discussions has been the need for education in the industry on the correct use of RCD's. In many cases issues could be averted if the manufacturers clear instructions were followed on installation and if regular RCD testing was implemented as stated in manufacturers instructions.

Progams such as those introduced in Western Australia and Queensland requiring retrofitting of RCD's when a house is sold and also in rental properties could potentially have a higher impact on preventable deaths compared to the risk perceived by the RIS.

ABB supports Option D of the RIS: *The prohibition is not extended after it expires on 30 June 2020, but ESV increases its education, compliance and enforcement activities surrounding RCBOs and their installation.*

ABB is actively involved in education of industry regarding RCBOs, as are many other suppliers. The increased focus from ESV on this topic will also benefit industry with a united message.

We also support continued activity at the Standards Australia level to provide a nationally consistent approach to electrical safety and RCD requirements.

The current edition of AS/NZS 3000:2018 contains an exception for RCD verification testing if power is not available at the premises. We understand this clause is being reviewed by Standards Australia Technical Committee EL-001 to be removed as part of Amendment 2 of AS/NZS 3000. We urge ESV to support the removal of this clause. It is possible to use a pure sine wave inverter to perform verification testing when power is unavailable and this procedure has been adopted in other states. Ensuring this test is conducted at the time of installation and also according to the regular test criteria recommended by manufacturers would ensure correctly functioning RCBOs are available in installations.

Yours sincerely,

[redacted]
Market Development Manager
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