

Electrical Safety and Other Legislation Amendment Bill 2024

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National Electrical and Communications Association - Submission

*Submission in response to Queensland Govt
Electrical Safety and Other Legislation Amendment Bill
2024*

21 June 2024

Overview

The National Electrical and Communications Association (NECA) provide this submission in response to the invitation to comment on the content of the position paper for electrical licensing – April 2024

NECA is the peak body for Australia's electrical and communications industry, which employs 344,370 people and turns over more than \$82bn annually. NECA represents over 7,000 businesses performing works including the design, installation, and maintenance of electrical and electronic equipment in the construction, mining, air conditioning, refrigeration, manufacturing, communications, security, automation, and renewable energy sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years and helps its members and industry operate in an efficient, safe, and regulatorily compliant manner. NECA represents the interests of electrical and communication businesses to all levels of government and in regulatory, legislative and industry development forums. It is also a foundation member of the Australian Chamber of Commerce and Industry (ACCI).

NECA have appreciated the opportunity to participate in the consultation process for this Bill and provide the following comments

General comment

NECA recognises the Queensland (QLD) Government's amendments drafted in the *Electrical Safety Act 2002* (the Act) which positively address our previously-raised concerns regarding high-risk extra low voltage (ELV) equipment. We are largely supportive of amendments to this portion of the *Electrical Safety and Other Legislation Amendment Bill 2024* (the Bill) with some reservations as set out below.

Electrical Safety Act

Cl 6 – Insertion of s 14A (Meaning of *prescribed electrical equipment*)

In previous joint industry submissions, we articulated a need for stronger legislative clarity between ELV and electrical work.

We are satisfied cl 6 has addressed our joint industry concern raised in earlier consultations regarding high-risk ELVs.

NECA would like to reinforce that following equipment should be specifically included as prescribed items in the regulation for the purposes of s14A(1)(c) –

- Battery Energy Storage Systems (BESS)
- Conversation equipment associated with ELV and LV supplies
- Off-power girds supplies to houses
- ES3 telecommunications data cabling and equipment.

Work Health and Safety Act – Industrial Manslaughter **CI 42 – s34C/S34D Industrial manslaughter**

NECA has previously articulated its concerns with respect to Industrial Manslaughter laws and their relationship to other legislation and WHS offences, in particular the Crimes Act.

NECA also share the concern expressed by the Master Electricians Australia that small companies and their directors will be disproportionately affected by the IM provisions whilst failing to deliver justice for families impacted by the negligence of larger and better resources organisations.

Conclusion

NECA continues to have an interest in working constructively with the Queensland Government in the development of a robust electrical and safety framework to ensure safe and competent electrical installation practices in the state. To arrange NECA's further input, or should you wish to discuss any matter relating to the electrotechnology industry please contact the undersigned.

Yours sincerely



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