



COOL
AIR CONDITIONING Pty Ltd

**INSTALL
MAINTENANCE
REPAIRS
BREAKDOWN**

3/453 Newman Road, Geebung Qld 4034
Email: accounts@coolaircon.com.au Ph: 07 3865 8843

ABN: 21 064 908 416
QBCC Licence No. 73634
RTA: AU 01640

5TH March, 2018

Committee Secretary,
Transport and Public Works Committee,
Parliament House,
George Street,
BRISBANE QLD 4000

Dear Sir,

RE: SUBMISSION TO THE GOVERNMENT RE PROPOSED MECHANICAL SERVICES BILL.

I am writing to you as a concerned Owner and Director of Cool Air Conditioning Pty Ltd, ABN 21 064 908 416, QBCC Licence Number, 73634, RTA: AU 01640.

I wish to express my concerns in relation to the proposed Mechanical Services bill which incorporates changes to the trade of Refrigeration Mechanic.

I appreciate the opportunity to voice my opinion of the proposed Bill, and strongly believe my opinion would reflect the majority opinion within our industry.

It is vital to ensure recognition as a specialized trade remains, alongside other trades, but without further disruption and fragmentation to the HVAC&R Industry.

My concern is that the HVAC&R Industry has already been grossly disadvantaged by the Government with the introduction and implementation of the "Certificate 11" Air Conditioning and Installation licence which allows Plumbers, Electricians, Builders and other ancillary trades to impose on our trade. This allows for sub-standard and often dangerous installations which could result in serious injury, even loss of life, not to mention increased emissions from leaking refrigerant due to leaking connections performed by unqualified trades.

This has also had an adverse effect on some business owners and has put them under increased financial pressure, as they cannot compete price wise, in an already saturated market.

Most "Certificate 11" holders that we are aware of, do not have the responsibility or the overheads that an employer of FULLY QUALIFIED Air Conditioning and Refrigeration Technicians have to endure to carry out a legal and licenced business.

For our employees to gain the required qualifications, we have to employ them as an apprentice for 4 years with training specifically dedicated to the Air Conditioning and Refrigeration trade, and absorb any costs associated with an Apprenticeship before they become fully qualified and fully licenced in order to carry out installations or repairs to air conditioners and refrigeration equipment.

They are specifically trained, OVER 4 YEARS, to fault find and to be aware of the many potential deadly hazards and risks that may occur, and due to their extensive training are equipped with the ability to quickly recognise any hazards or risks and implement procedures to avoid any serious damage. Other trades and licensees trying to intrude on our trade are not experienced and therefore not aware of the many potential dangers to both the consumer and other trades people.



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It is my opinion that a proposal to introduce a new mechanical services licence class, regulated as plumbing work, and requiring a plumber's licence to be equivalent to the current Victorian Building Authority model, is absolutely not a solution and shows no recognition to the highly skilled HVAC&R tradespeople.

I believe our HVAC & R industry is fundamentally flawed since the inclusion of the Certificate 11 split systems qualification and Arctic licence which has allowed unqualified people to work outside their scope. This erosion of the HVAC&R qualifications over the years has led to the current situation where Certificate 11 holders have minimal knowledge of the refrigerant let alone the impact that new refrigerant emissions have on our environment.

I have also had feedback from customers that many of these fast-track licence holders are unable to answer the most basic of questions regarding refrigerant or the unit itself. This proving that the government is merely pushing through licences without licence holders needing to demonstrate their understanding of the environmental impact of their work.

Not only is the government rapidly losing credibility, the flow on loss is suffered by specialist, trade-qualified refrigeration and air conditioning mechanics due to the general lack of understanding by the public, of Australia's unfair two-tiered licensing system.

I strongly suggest that that the Government abandon any new mechanical service licence class regulated by the plumbing industry in relation to any HVAC&R work and restore the requirement that only trade qualified refrigeration and air conditioning mechanics holding a Certificate 111 qualification or higher work in the HVAC&R field.

In closing, I am concerned that regulators and governments overlook the fact that our HVAC&R industry is a vital and specialized trade alongside other trades inclusive of a 4 year apprenticeship. You have failed the HVAC&R industry with the introduction of varying licence types to appease these different trade sectors, and in doing so you are reducing competencies just so they can gain compliance.

Consideration must be given to us, the HVAC & R tradespeople. This affects our livelihood and the deliverance of a consistent workplace health and safety environment across the industry. The industry must be regulated to essentially reduce accidental deaths resulting from inadequately trained operators attempting to undertake highly skilled work.

I strongly oppose the introduction of the new Proposed Mechanical Services bill in any form.

Kind Regards,

Kevin Crutcher,

Director

3/453 Newman Road, Geebung QLD 4034



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