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8 March 2018

Committee Secretary
Transport and Public Works Committee
Parliament House
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Dear Committee

Thank you for the opportunity to provide a submission on the draft Plumbing and Drainage Bill 2018. We are a husband and wife team who own an air conditioning and refrigeration business which in addition to ourselves hires one tradesman, one fourth year apprentice and one second year apprentice. Our business has been operating for the last 13 years. We also have a son who will be coming out of his air conditioning and refrigeration apprenticeship who works for another company so we believe we have a lot at stake with regard to the Plumbing and Drainage Bill 2018.

There are a few issues in the Plumbing and Drainage Bill 2018 which are causing us considerable concern. They are as follows:

STC and its input. We do not believe that the Services Trade Council can work with impartiality with regard to the introduction of a new Mechanical Services Licence in the Queensland Building and Construction Commission Act 1991. The STC was formed under the Plumbing and Drainage Act 2002. An example of the STC's lack of impartiality can be seen in the Master Plumber magazine May/June 2016 page 16 and 17 which states....

"Industry Win with the Service Trades Council

MPAQ have had a win for the plumbing Industry with the re-establishment of a dedicated plumbing industry regulatory body. The Service Trades Council (STC) Bill was passed in Parliament on Thursday 24 March.

MPAQ has been the key driving force in negotiations with this government. This important piece of legislation demonstrates that MPAQ is here to be a voice for the plumbing and gas community, to initiate and spearhead change in increasing the professional standards of the industry, to be vocal when it comes to Government policy and initiatives, and to be the body that stakeholders (like the Government) call and ask "What do you think?""

...."So what does this actually mean?"

The Industry will have a dedicated Plumbing Industry Regulatory Body, known as the STC"

Hilton, L et al. (2016). *Master Plumber*. Acacia Ridge Qld: Master Plumber's Association of Queensland

We believe that *if* air conditioning and refrigeration has to fall under the STC there should be equal number of interested parties on the board and involved in decision making. Currently on the board there are four members with strong affiliations to the Plumbing Industry out of ten members and only one for the air conditioning trade.

We also have serious concerns about proposed introduction of the Mechanical Services Plumbing licence and the scope of work described in the Queensland Building and Construction Commission Act 1991 as this would seriously jeopardize the future of ourselves, our tradesmen and our apprentices. In the Mechanical Services draft bill, we have been advised that in order to obtain a Mechanical Services Licence an air conditioning and refrigeration mechanic would require a Plumber's Licence. As a result should our tradesmen wish to start their own business they would need to undertake a further 4 years apprenticeship in plumbing in order to obtain a QBCC mechanical services licence to undertake the work that they are currently doing, having already completed an air conditioning and refrigeration apprenticeship. How that can possibly make sense actually beggars belief. We are concerned that our current apprentices will lose the incentive to carry on their air conditioning and refrigeration apprenticeship as they would be better off just quitting and beginning a plumbing apprenticeship and we are very concerned that the proposed changes will lead to less qualified tradesmen working in a specialized and dangerous trade. This will make it harder on our business to hire air conditioning and refrigeration apprentices and properly qualified mechanics.

The current environment we work in is already unsafe as a direct result of certificate II split installers, workers who have no real understanding of refrigerated systems operating at high pressure, they have little to no knowledge of refrigerants, nor the ability to provide installations to meet energy efficient star ratings. The draft bill would see split systems excluded "Unsubstantiated and harmful to Queenslanders" in the proposed refrigeration and air conditioning licence and goes on to further increase unsafe working environments by failing to ensure mechanical services plumbers cannot work on any refrigerated systems, all which operate at high pressure and inclusive of CO2 as a refrigerant. With the introduction of the Kigali Accord this is only going to get worse with the introduction of more flammable refrigerants.

In our personal experience we have found that we are no longer competitive in the split system installations. Currently an electrician with a Cert II restricted refrigerant handling licence which he can obtain through a two week course, when installing a standard split system is getting \$ 72.00 an hour however a fully qualified Cert III air conditioning and refrigeration mechanic (having carried out a four year apprenticeship) when carrying out the exact same job will only get \$ 47.00 an hour, using the same materials. The reason why electricians benefit more than the air conditioning refrigeration mechanic is that we have to get an electrician to come and wire up the system. The electricians union is so strong that we are not allowed to install even an isolator. We are not allowed to do a two week course to carry out the electrical work. Again where is the fairness of this? As an air conditioning and refrigeration mechanic it feels that our trade is under constant attack by other trades who have more money and more political influence.

The draft bill is unacceptable in its current form and requires significant changes to ensure licencing is aligned correctly with required skills. Failing to do this exposes every Queenslanders to unsafe environments, in the home, at the office, at school, in hospital, when shopping, everywhere we go refrigerated systems are with us and this government refuses to provide basic safety for every Queenslanders.

Refrigeration and air conditioning is a single trade, it is not plumbing and neither is it electrical, we challenge this government to produce evidence of the required skills to work on refrigerated systems, inclusive of air conditioning by either mechanical services plumbers or electricians. To date all evidence has been ignored which should see an occupational refrigeration and air conditioning licence with zero \$\$\$ threshold under the QBCC.

Training has been dumbed down with many limited to learning only split system installations and soft drink fridges. In Victoria plumbers also are losing their skills due to split systems installations and Victoria is looking long term at a standalone refrigeration and air conditioning licencing model, yet here is QLD wanting to implement a system that Victoria are admitting is flawed.

Tasmania has acknowledged the need for split installations to be installed by trade qualified refrigeration and air conditioning tradespeople, acknowledging the changes toward increasing the use of natural refrigerants. Hydrocarbon, a natural refrigerant must be included under an occupational licence as the current licencing prohibits this government's ability to comply with Australia's international agreements, including the Kigali Accord.

Basically we have a draft bill that further impedes the reduction of greenhouse emissions policies of federal government, provides unsafe environments for every Queenslander, unaffordable energy bills, and excessive demands on energy providers and very low industry confidence for viable businesses in this industry.

The Minister has in his address mentioned improved safety and savings that will be realised as a result of the bill. We do not dispute that the medical gas issue needs to be addressed, however letting underskilled workers work on pressurised and flammable systems is an accident waiting to happen.

Impact to the Air conditioning and refrigeration trade

- Increasingly dangerous working environment with insufficiently trained workers working on highly pressurised, flammable machinery especially now with the introduction of the Kigali Accord.
- Lack of a proper voice for air conditioning and refrigeration industry and the watering down of training. Being hijacked by another trade, a trade that has little to no common ground with air conditioning and refrigeration, but that will have control over air conditioning and refrigeration trade.
- Lack of incentive for current apprentices to carry on in the air conditioning and refrigeration trade as if they wish to start a new business in the future they will need to complete a four year Plumbers apprenticeship to obtain a mechanical services licence from the QBCC in order to open up an air conditioning and refrigeration business.
- Fewer job applicants. There will be fewer people wishing to carry out air conditioning and refrigeration apprenticeships as they will be better off obtaining a plumbing apprenticeship.
- Increased competition in the air conditioning and refrigeration field which **will not** improve the quality of the trade as it will cause legitimate and very experienced air conditioning and refrigeration people to walk away from the trade as air conditioning and refrigeration mechanics DO NOT have the option of carrying out **plumbing work** or **electrical work** in our down seasons.
- Restraint of trade for air conditioning and refrigeration mechanics and apprentices.
- Destruction of a trade - Having to be signed off by a trade that has very little knowledge of air conditioning and refrigeration.

- Skill shortage as experienced tradesmen will either quit the air conditioning trade or move to a state where air conditioning and refrigeration trade is properly recognised.
- Basically this bill is designed to give the plumbers an unfair advantage in that they can carry out our work yet we cannot carry out any of their works.

We urge the committee to demand the following;

1. An occupational licence for the refrigeration and air conditioning trade under the QBCC, Inclusive of all refrigerants and inclusive of split systems and Inclusive of ductwork and associated incidental work such as roofing
2. Include hydrocarbon refrigerant under the refrigeration and air conditioning trade to ensure QLD can meet the federal governments international agreements
3. A zero \$\$\$ threshold for any works
4. A mechanical services plumber licence which excludes work on all refrigerated systems and Mechanical Services Switchboards dedicated to HVACR.
5. The mechanical services licence be removed from the Plumbing and Drainage Bill 2018. The Refrigeration and air conditioning trade does not want to fall under the Plumbing and Drainage Act 2018. We are our own standalone trade with a very specialised skillset that cannot be learnt with a few additional short courses.
6. Support for the air conditioning and refrigeration trade which is being hijacked and diminished by other trades who have money backing them and political influence. The bill in the current format including the mechanical services licence in its current format will be hugely beneficial to the Plumbing trade however will have seriously damaging impact to the air conditioning and refrigeration trade.
7. Review of input from STC regarding introduction of Mechanical Services Licence into QBCC Act 1991 and its impartiality.

We respectfully request the opportunity to be put on the list to give evidence at the committee hearing.

Yours faithfully

Craige and Claire Parkin

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