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9th March 2018

Committee Secretary
Transport and Public Works Committee
Parliament House
George Street
Brisbane Qld 4000
Dear Secretary

RE: Letter of Submission on Plumbing and Drainage Bill 2018 – Section on changes to Mechanical Services

Thank you for the opportunity to provide a written submission regarding our concerns with the proposed Plumbing and Drainage Bill 2018. As an owner/operator of A1 Cooling Pty Ltd, a local HVACR business servicing the wide bay area, based in Bundaberg, with 15+ staff, I am concerned that this Bill will greatly impact our business, staff and clients. The **Plumbing and Drainage Bill 2018** is proposing to introduce a ruling that will prevent my business who employs HVAR tradesmen from carrying out our job which we are qualified for, after studying four years to achieve such a qualification.

This legislation, which supports the creation of a mechanical services licence, has led to serious concerns about plumbers carrying out work that should be undertaken by refrigeration and air conditioning tradespeople. Plumbers are not qualified to ensure

the safe insulation, commissioning and decommissioning of refrigerated air conditioning systems. A refrigeration and air-conditioning mechanic, has completed a four year apprenticeship to achieve their qualification which enables them to conduct Mechanical services and HVAC work. They are governed by a code of practices, standards and ARCTick regulations, to ensure their work is compliant.

If this Bill was to be introduced allowing plumbers to obtain a mechanical services license, and preventing refrigeration mechanics from carrying out works with copper piping, we will not be able to perform the work which we are qualified for. For example if a HVAR tradesperson was required to make repairs involving replacing a compressor on a refrigeration system such as in a kitchen cold room at a hospital, they would not be able to remove the compressor, they would be required to call in a plumber to remove it, as it is brazed to copper pipe and install the new compressor. This would involve relying on their brazing to be pressure/leak tested to ensure no refrigerant gas (ozone depleting) leaks out, which is at an extremely high pressure. Refrigeration mechanics are compliant, experienced and qualified in brazing copper pipe to ensure there are no refrigerant leaks. They are regulated by ARC tick standards and have appropriate licenses to handle and work with refrigerant. This unlike the plumbing industry which is not compliant, and have experience or qualification in brazing copper pipe for a refrigeration system. They use different copper and brazing materials, and they are only experienced in low pressure systems, not high pressure refrigerant system which they are currently not allowed to work with.

I have spoken to many of our clients/wholesales within our serviced area in relation to this Bill, they have expressed similar disagreement towards this proposed Bill. As from a client's perspective, they would require multiple tradespeople - a refrigeration mechanics and a plumber, to carry out mechanic services works costing the client more. This is now currently achieved with only one trade worker, the refrigeration mechanic. Yet this is inconsistent with Mick de Brenni Minister of Housing and Public Works who introduced the Bill stating that it would provide cost saving for the customers.

As the owner of a HVACR business, I am concerned for our future generation. We currently have three refrigeration apprentices working with us. The impact of the proposed Plumbing and Drainage Bill on our area of trade may jeopardise the value

of their training, as well as their employment opportunities. If this proposed Bill is passed these tradespeople will not be able to perform the job they are trained for without the appropriate license.

The argument that refrigeration mechanics will be eligible for a restricted licence, for a task that we currently perform on the mechanical services works, will just incur further costs to businesses and individuals. Considering that they are already required to pay for an ARCTick licence and a restricted electrical licence.

My recommendation is that the bill remove the section which will allow plumbers to carry out Mechanical Services, as plumbers should not be undertaking work that takes a technician working in HVACR four years to attain. A plumbing apprenticeship will not deliver the outcome consistent with the scope of work involved with mechanical services. It is important for both health and safety of our public that this work is only performed by fully trained and competent HVACR trades people. As stated in Plumbing and Drainage Bill 2018, Explanatory Notes on page 2

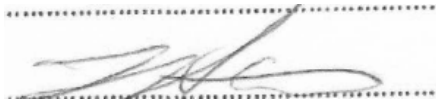
‘Mechanical services work involves the mechanical heating or cooling of buildings. In Queensland’s diverse climate, it is important that this work is performed by an appropriately qualified individual. These systems contribute to the overall health and safety of our community and if incorrectly installed can have fatal consequences. For example, legionella is a type of bacterium that can grow and spread through air-conditioning units for large buildings, such as hospitals or shopping centres.

Medical gases are used in hospitals, medical facilities and dentists’ rooms for patient care, therapeutic and diagnostic purposes and surgical tools and includes the supply of gases such as oxygen, helium, nitrous oxide, carbon dioxide and anaesthesia waste.’

In conclusion, this bill is **not** going to improve the safety and standards of work involved in mechanical services. It is **not** going to be a cost saving for consumers. It is **not** going to help HVACR companies stay in business, it **is** however going to help plumbers to grow their business but at the cost of safety and efficiency. When Mick de Brenni introduced this bill he stated there was a need for licencing to raise standards, however safety and the environment rely on the government acknowledging HVACR as a specialised trade and must ensure only technically competent HVACR tradespeople undertake this scope of work. As a stakeholder within

this industry I believe this Bill, if passed will be introducing a law that will prevent me as a business owner and my staff from completing the jobs that we are qualified. This in turn will impact our clients as they will require further trades to complete a task we currently perform, affecting our business, staff and client's income, growth potential. I believe this Bill will cripple the HVACR industry and therefore I do not and will not support the proposed Plumbing and Drainage Bill 2018.

Yours faithfully



Nathan Schofield

The Manager/ Owner

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