

23rd October 2017

Committee Secretary
Transport and Public Works Committee
Parliament House
George Street
Brisbane Qld 4000
tpwc@parliament.qld.gov.au

Dear Committee,

Thank you for the opportunity to provide a submission on the draft Plumbing and Drainage Bill.

I am a trade qualified refrigeration and air conditioning tradesperson and a small business owner, as such I draw on my own experiences and the impact current and recommended licencing has and will have on my safety, apprentice's training and my business.

The current environment I work in is unsafe as a direct result of certificate II split installers, workers who have no real understanding of refrigerated systems operating at high pressure, their 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.

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, I challenge this government to produce evidence of the required skills to work on refrigerated systems, inclusive of air conditioning by either mechanical services 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. Job growth predictions are poor with ARMA citing only 34 new jobs over a 5 year period. Electricians unable to install basic domestic lights because they are doing split system installs. 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 agreement. One example was the group training organisation that attempted to install a system using hydrocarbon but couldn't as a result of poorly developed hydrocarbon policies.

The draft bill is confusing, unclear and even suggests ductwork is not included in a proposed licence for my trade.

So poor are the many air conditioning installations it has become a burden on energy providers, the very same providers who reap the massively increased financial benefits of unnecessary high energy bills to Queenslanders and the best government can tell all Queenslanders is to not turn on your (Inefficient) air conditioning systems.

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

I 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
2. Including hydrocarbon refrigerant to ensure QLD can meet the federal governments international agreements
3. A zero \$\$\$ threshold for any works
4. Inclusive of ductwork and associated incidental work such as roofing
5. A mechanical services plumber licence which excludes work on all refrigerated systems and Mechanical Services Switchboards dedicated to HVACR.

Regards

Max Losch

