

8 March, 2018

Committee Secretary  
Transport and Public Works Committee  
Parliament House  
George Street  
Brisbane Qld 4000  
[tpwc@parliament.qld.gov.au](mailto: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 currently employed by a Refrigeration and Air Conditioning company. My experience in this industry, leads me to have concerns about the impact current and recommended licencing currently has, and will continue to have, on the safety of those trades people and apprentices employed in the industry. My concern is also for the job security of support staff employed in the Refrigeration and Air Conditioning industry in the event of changes having implications on the profitability of businesses.

The industry's workplace environment is currently 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 Queensland to unsafe environments, in the home, at the office, at school, in hospital, and when shopping. Refrigerated systems are a part of our everyday lives. If not amended, this bill will clearly demonstrate the government's disregard for their obligation to ensure the basic safety of every Queensland.

**Refrigeration and air conditioning is a stand alone 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 no monetary threshold under the QBCC.**

The standard of training has reduced significantly, with many workers 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. Some electrician's skills are diminishing because they are predominantly installing split systems. In Victoria, plumber's skills are diminishing due to time invested in split system installations. **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.

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

Substandard air conditioning installations have become a burden on energy providers. The very same providers who reap the massively increased financial benefits of unnecessarily high energy bills to Queenslanders. The best solution our government has to offer to all Queenslanders, is to not turn on 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. No monetary threshold for any works.
4. The licence to be 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



Rob Miller

