

7 March 2012

Safety Switch RAS Feedback
Electrical Safety Office
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Dear Sir/Madam

Re: Extension of mandatory requirements for fitting of safety switches in residential accommodation

Master Electricians Australia and the Electrical Contractors Association are grateful for the opportunity to provide feedback in response to the Regulatory Assessment Statement released by the Department of Justice and Attorney-General, *Extension of mandatory requirements for fitting of safety switches in residential accommodation*.

Master Electricians Australia appreciates the Queensland government's commitment to the electrical safety of the Australian public. As Australia's peak body concerned with electrical safety, we welcome any regulatory changes that will prevent more unnecessary death and injury from electrical shock.

Master Electricians Australia Ltd (MEA) is a not-for-profit organisation that provides an accreditation program to electrical contractors seeking to differentiate themselves from other contractors. This national accreditation program is designed to achieve the highest standards of quality, safety and reliability. The organisation's website is:

<http://www.masterelectricians.com.au>.

MEA is proud to be a partner organisation of the **Electrical Contractors Association** (ECA), which has been representing electrical contractors for more than 70 years, making it one of the longest-standing industry associations of its kind. The association's website can be found at: <http://www.masterelectricians.com.au/page/ECA/>.

References to Master Electricians Australia and opinions expressed by Master Electricians Australia, within this letter, should be read as both Master Electricians Australia and the Electrical Contractors Association.

The existing regulations concerning safety switches are clearly inadequate. The fatalities in the industry in 2009 and 2010 relating to installation of foil insulation were a timely reminder of the urgent need for review of the existing safety switch requirements. The statistics detailed in the Regulatory Assessment Statement (RAS), which indicate the electrical related fatalities and injuries that could have been prevented by safety switches on all sub-circuits, speak for themselves.

MEA fully supports option four as detailed in the RAS which would see the mandatory fitting of safety switches to all safety switch capable sub-circuits at the time of completion of most types of electrical work at domestic residential properties. This option will ensure maximum protection from electrical shock, whilst the extended compliance period will give homeowners the opportunity to achieve economies of scale. Option four will also spread the demand for licensed electrical contractors over a longer period of time, avoiding the inevitable last minute rush for safety switch installation near to the end of the fixed five year period as proposed in options one and three.

We urge the government to disregard options one or two as neither will take advantage of the maximum level of protection that is available. The fitting of safety switches on power and lighting circuits only, while providing some protection against electrical shock, would leave the circuits that support appliances such as stoves, ovens, hot water systems and air-conditioners, unprotected. A range of factors such as water ingress, screwing or nailing through live cables inside walls, and contact with damaged equipment can cause injury or death on circuits other than power and lighting. To achieve the highest level of protection for home occupants and tradespeople, every circuit in the home needs to be protected by a safety switch.

A report commissioned by MEA, *Switch Thinking – Preventing Electrical Deaths in Australian Homes*, indicates strong public support for the installation of safety switches on all circuits. According to market research conducted for the *Switch Thinking* report, around 80% of people agreed, or strongly agreed, that safety switches should be compulsory on all circuits. Specific regulatory requirements, such as those proposed in option four, are sure to provide the much needed push for the public to act in their own interests and have safety switches installed on all circuits. Undoubtedly, the financial cost for home owners will act as a barrier to the public's acceptance of new regulations requiring the installation of safety switches on all circuits in their home. However, education will play a key role in overcoming this obstacle by facilitating an understanding of the benefits of having safety switches on all circuits. A comprehensive education campaign will allow the public to appreciate that a relatively minor investment will provide long term protection against electrical related injury or death.

Government will need to consider the cost impact on pensioners and other low income earners for whom the cost of one or more safety switches could represent a significant portion of monthly income. There are a range of options available to support lower income earners which include direct government subsidies, such as those provided in many jurisdictions for environmental measures such as solar panels, through to financing arrangements. The added benefit of option four is the gradual roll out of the safety switch requirements, as opposed to a definitive cut-off date as proposed in options one and three. This will allow members of the public to plan for the added expenditure over a period of time. However, ultimately this is not an argument about cost or even social equity. This is an argument about safety in our homes and about preventing unnecessary deaths. Any cost and inconvenience to home owners must be measured against the human cost of inaction.

As part of these regulatory changes, it is also important for the public to be made aware that once installed, all safety switches need to be tested regularly to ensure the mechanism works freely. Nothing is failsafe, and safety switches, just like smoke detectors or any other safety device, must remain in good working order. If the devices are not working properly, their protection value is negated. We recommend that an accredited Master Electrician be endorsed by the government as the electrician of choice for both safety switch installation and testing as their skills and safety standards are second to none in the marketplace.

MEA strongly believes that the highest level of protection from electrical shock injury and death will only be achieved through the addition of a safety switch to every circuit in every Australian home. We also acknowledge that making this requirement mandatory with a definitive cut-off date could place a financial burden on the community and could see a demand for electrical contractors that the current market may struggle to meet. In light of this, we consider the extended phase-in compliance period proposed in regulatory option four to be the most effective means by which to achieve the ultimate goal of an electrically safe domestic environment Australia-wide.

There is no excuse for complacency regarding electrical related injuries and fatalities when the solution is known. Having safety switches installed on every sub circuit in every Australian home will save lives and prevent further injuries. With the appropriate regulations in place and with strong support from government we can ensure the electrical safety of the Australian public.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Richards', written in a cursive style.

Malcolm Richards
Chief Executive Officer