



national
electrical and
communications
association

WESTERN AUSTRALIA CHAPTER

Unit 18 – 20,
199 Balcatta Road,
Balcatta WA 6021
PO Box 782,
Balcatta WA 6914

T 1300 NECA WA
F +61 8 9240 4866
E necawa@necawa.asn.au
W www.neca.asn.au
ABN 19 295 803 769

3 April 2018

Reform of the State Government Business Licensing
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear Sir/Madam

Thank you for the opportunity to make a submission on the reform of state government business licences.

The National Electrical and Communications Association (NECA WA) is the largest industry association representing the interests of electrical contractors and the wider electrical industry. NECA WA currently has more than 1,350 members.

NECA WA also established the state's largest provider of electrical training, the College of Electrical Training and the state's largest employer of electrical apprentices, Electrical Group Training.

NECA WA's members are currently affected by the following licences:

- Electrical Contractors Licence
- Electrical Workers Licence
- Electricians Licence
- Restricted Electrical Licence or Permit
- In-house Electrical Installing Work Licence
- Electricians Training Licence

It is NECA WA's view that all of these licences should remain in place. Over many years, Western Australia's licensing regime has protected both the industry's professional standards and the maintenance of public safety.

1. Electrical Contractors Licence

An Electrical Contractors License and the strict electrical regulations (Electricity (Licensing) Regulations 1991) are in place to ensure that electrical work is undertaken safely and correctly and as a result the public is not placed at risk from electric shock or fire.

An Electrical Contractors Licence also ensures that contractors are aware of their additional responsibilities, such as ensuring that electrical workers are working safely, their work is monitored and that apprentices are being properly trained and supervised.

Licensing also ensures that employers of electrical workers have to understand business processes, have insurance and must maintain standards over just commercial considerations.

Contractors are subject to regular inspection and audit, which by virtue of their traceable licence number is easy to undertake and ensures compliance.

2. Electrical Workers Licence

Working on, or in the vicinity of, electrical installation and apparatus, is dangerous work, which may result in fire or electric shock if not undertaken correctly.

A high level of expertise and training is required to ensure work is carried out safely and correctly, hence it is imperative that persons working in this field are licensed.

Licensing ensures a clear means of accountability throughout the industry. Work is recorded by way of an electrical contractors and/or electrical workers license number. This ensures that non-compliant work can be easily traced back to individual workers and contractors and remedies enforced.

3. Electricians Licence

An Electricians Licence is essential to ensure that persons installing or working in the vicinity of live electrical parts are properly trained and competent to undertake this work.

Licensing ensures a required standard and knowledge is attained, hence ensuring the safety of the individual and the public. It also sets a requirement that electricians are competent and perform electrical work to the required standards and prohibits untrained persons from legally undertaking electrical work.

4. Restricted Electrical Licence or Permit

Restricted Electrical Licences or Permits allow unlicensed trades such as plumbers to perform limited electrical work such as disconnecting/ re-connecting electrical apparatus.

This work is exposing the operative to the threat of an electric shock, so it is critical that a prescribed level of training and competence is achieved to safely undertake this work.

Licensing ensures a degree of competency which is beneficial to the public as they are assured that a trained person is performing the work. From an economic perspective, a restricted licence eliminates the need for two trades to attend a job, hence reducing costs.

Clear boundaries are also set in relation to the scope of work that can be performed to ensure that workers do not undertake work which they are not licensed to perform.

5. In-house Electrical Installing Work Licence

An In-house Electrical Installing Work Licence is similar to an Electrical Contractors Licence, however the holder is restricted to only perform electrical installation work within the confines of their premises.

In-house licence holders have the same responsibilities as an electrical contractor, as they employ electrical workers. They must have the same safety considerations and also comply with the same regulations and standards.

It is essential that this licence remains as it ensures that electrical workers are correctly monitored by their employer, that systems are in place to ensure safe working practices and apprentices are trained and supervised.

6. Electricians Training Licence

The Electricians Training Licence should be retained as it is a vital means by which the integrity of electrical apprentice training is maintained.

The only way a person can complete an electrical apprenticeship is if they hold an Electricians Training Licence. The conditions of an electrical apprenticeship also ensure that only work completed while an apprentice holds this licence counts toward the competencies of the apprenticeship.

This ensures that a person cannot have non-electrical experience (for example, the work of a trades assistant, engineer, or technician) being recognised towards obtaining a full electrical licence.

The licence strengthens the integrity of the apprenticeship and ensures that an apprenticeship remains the only path to an electricians licence.

Further comments

- In 2015, the Federal Government undertook a national review of licensing regimes, which found that Western Australia has one of the most robust licensing systems of any state in Australia.
- The National Training Packages for Electrotechnology are embedded with essential safety competencies, some of which are derived from licensing requirements. If licensing requirements were removed, then these essential safety competencies may no longer be required in electrical training. This would result in a significant decline in the safety standards provided for in the training packages.
- The improved provision of public safety which a robust licensing regime provides, must in NECA WA's view, be given a higher benchmark value than if it was assessed purely against its economic value. The general public's knowledge that electrical work will be completed safely by a licensed tradesperson, has a considerable social benefit which must be taken into account.

It is the strong view of NECA WA that having a robust licensing regime has considerable important benefits to employers, workers, industry regulators, network providers and the general public and that it should be maintained in its current form.

Yours sincerely



Garry Itzstein
Executive Director