

National Electrical and Communications Association:

Submission to Senate Inquiry into the Energy Efficient Homes Package

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Background:

- 1) The National Electrical and Communications Association (NECA) is the only national industry association representing contractors responsible for the delivery of electrical, voice and data communications systems in Australia. It has approximately 5,000 businesses as its members, which employ approximately 50,000 tradespeople.
- 2) The Association actively represent the needs of contractors with Australian governments and industry, ensuring members' needs are heard. NECA works to steer the future of the industry on critical issues such as licensing and regulations, training and education, skills shortages, workplace relations and occupational health and safety. Through membership on more than 30 Standards Australia Technical Committees and other relevant industry bodies, NECA represents its members' interests on important matters that affect their businesses.
- 3) NECA employs a national network of industry-based Occupational Health and Safety experts and advisors who are capable of delivering advice, training and information to employers and employees, and to the industry and government departments as necessary.
- 4) The principal objectives of NECA are the promotion, safeguarding and advancement of members' interests. NECA provides our members with a full range of OHS support services and we also work with our members to enhance and improve management systems and work practices in the industry. NECA's key position on the area of Occupational Health and Safety is that the member company must be accountable for all aspects of health and safety for their staff.

- 5) The training and services relating to Occupational Health and Safety that NECA provides to members are diverse and include:
- Extensive Safe Work Method Statements and Risk Assessments
 - Tool Box Talks Manuals
 - Return to Work Manuals
 - Comprehensive “NECAsafe” training courses and associated manuals
 - OHS site visits and audits
 - OHS training provided on site.
 - OHS working committees in every state
 - Representation on the OHS Committee of Australia’s peak employer body, the Australian Chamber of Commerce and Industry
- 6) NECA has been actively involved in the debate regarding the safety of the Home Insulation Program, and in addition to the numerous meetings attended with Government, have also provided assistance to the Department of Environment, Water, Heritage and the Arts in developing a risk assessment suitable for insulation installers and have been involved in a series of meetings to review relevant standards, specifically those related to down lights and the safe installation of insulation near to them.

NECA Response:

- 7) NECA provides comment on the following aspects of the inquiry into the Energy Efficient Homes Package:

Terms of Reference iii (B)

What advice was provided to the Government on safety matters, particularly in relation to fire and electrocution risks and to what degree the Government acted on this advice.

- 8) As early as 16 February 2009, NECA provided advice and clear warnings to the Government regarding safety issues related to the installation of insulation. In attached media releases and letters to Minister Garrett there are many examples of such warnings long before any loss of life occurred.
- 9) NECA’s area of concern were two-fold, with both the potential risk of fire from covering down lights and other electrical fittings found in ceiling spaces and the hazards associated with incorrectly and inappropriately installed insulation raising concerns.
- 10) “there is significant risk of electrical equipment overheating especially in the event of down lights in ceilings being covered if insulation is installed inappropriately. This is a very real fire hazard.” (16/02/09 – full media release attached)

- 11) NECA called immediately for the Government to engage licensed electrical contractors to oversee the process and monitor each installation.
- 12) "We also strongly recommend a licensed electrical contractor be consulted to ensure that existing electrical wiring and other installations are protected" (16/02/09 – full media release attached)
- 13) In writing to Minister Garrett and raising these concerns, and in being advised by return letter that NECA would be consulted in any further developments and meetings, NECA, as the only national industry association for electrical contractors, was very disappointed to be excluded from the initial consultation meeting regarding the safety of the Program after the first death. NECA did participate in a meeting on 12 November 2009 where again we suggested the involvement of a licensed electrician to sign off on any installation. The response to this suggestion was that there was not enough money available. *Letters of correspondence attached.*
- 14) On 26 November 2009, NECA raised the issue again, with a call for compulsory inspections before and after the insulation installation had occurred.
- 15) "NECA recommends that all installation of insulation in roof cavities involve a compulsory pre-installation inspection by a registered electrical contractor and a follow-up inspection at the completion of installation" (26/11/09 – full media release attached)
- 16) This request was taken up by the Federal Opposition and raised directly with the Government in Parliament on 27 November 2009. NECA members have grave concerns for the safety of their staff entering roof spaces that have not been tested.
- 17) The Government introduced several measures designed to improve the safety of the Program, significantly the banning of metal fasteners on foil insulation, and the mandated need for a down light covering for every light.
- 18) The Wiring Rules, AS/NZS3000:2007, call either for sufficient space or a barrier to be placed between a down light and insulation. The Government's call for a specific cover was a step higher than the requirements in the standard.
- 19) It does not seem as if technical experts were consulted at length on either of these issues.

20) Terms of Reference iii (F)

What advice was provided to the Government on occupational health and safety matters, particularly in relation to training for installers; including:

- (i) to what degree the Government acted on this advice; and
- (ii) identification and examination of fires and electrical incidents resulting from the government's Home Insulation Program.

21) NECA made reference to the importance of using appropriately trained installers in our very first response to the announcement of the Program in February 2009.

22) "To guarantee the safety of home owners and occupiers, we cannot emphasise enough the importance of using properly trained insulation installers" (16/02/09 – full media release attached)

23) However, the competency based training that was implemented should have been satisfactory, however the inconsistent delivery of this training, and the large amount of exemptions, meant that the training was not enough.

24) The Government did accept recommendations from industry and training experts in the revision of the training materials and associated risk assessment forms, to include visual aids to assist those without a firm grasp on the English language. It is unfortunate that these changes appear to be a case of too little, too late.

NECA's current position:

25) Threat of electrocution from foil insulation and testing for "live foil" in ceiling spaces

26) The Minister's announcement for a full electrical testing program for all houses where tin foil was used under the insulation program supported NECA's earlier call for such a measure.

27) NECA has been working with the Minister's office and his Department to ensure that this is done in a safe, effective and timely manner. In particular, the safety of the electricians undertaking the testing and that of the householders was critical.

28) NECA believes that the testing procedures currently being developed in conjunction with the Department and NECA and others **should be mandated** under the testing regime.

29) As this testing will be carried out by licensed electricians NECA is firmly of the opinion that only a brief familiarisation session is required by those electricians who will undertake the work. The work is not complex and such an "induction" session can be run by the employer in conjunction with normal company occupational health and safety "tool box talk".

30) NECA also believes that those electrical contracting companies undertaking this work must have:

- Professional Indemnity (PI) insurance, either standalone or a PI component of not less than \$10 million as part of the normal business insurance
- A documented and implemented occupational and safety system

32) To not mandate these two features leaves the testing regime open to those who may not have the proper business tools to ensure a safe outcome of the testing regime.

33) Further, the experience gained from the limited electrical testing (about 1000 houses) in Queensland in late 2009 and early 2010 should be used for guidance when setting the procedures for the major testing rollout. In particular, a large facilities management (FM) company was engaged by the government who in turn engaged electrical contractors to do the testing. FM companies have their own database of pre-registered companies who meet criteria to ensure that they will complete the work competently and have suitable OHS and other procedures in place. NECA proposes that the Government adopt this model once again to quickly progress the roll-out of a safe and effective testing regime.

34) Threat of fires from ceiling insulation:

35) The threat of or actual fires resulting from shoddy installation of ceiling insulation remains a very pressing concern for NECA, and we are working with the Lighting Council of Australia at the request of the Electrical Regulatory Authorities Council (ERAC) to address any short comings of the existing standards.

36) NECA believes that the Government should now urgently consult with industry to decide how best to address the potential for ceiling fires due to the poor installation practices of insulation installers. As summer finishes, earlier sunsets and colder temperatures will increase the use of down lights and ceiling heating devices such as those used in bathrooms.

Attachments

Letter to Minister Garret (9 March 09)

Response from DEWHA (20 April 09)

NECA emphasises safety when installing insulation after economic stimulus package passed (16 Feb 09)

NECA warns of fire and electrocution dangers when installing insulation (23 Oct 09)

NECA calls for quick action on new safety inspection standards to combat dangers of installing insulation (26 Nov 09)

Federal Government must act following another death (05 Feb 10)

Federal Government must conduct safety inspections (9 Feb 10)

NECA welcomes safety inspections (11 Feb 10)