



24 January 2019

To: Energy Safe Victoria

By email: Consultation@energysafe.vic.gov.au

Responses to the Consultation on the Electrical Safety (General) Regulations 2019

The Australian Dental Association Victorian Branch (ADAVB) is the peak membership body for Victorian dentists. With over 3,800 members, we represent almost 80% of dentists in Victoria. We thank Energy Safe Victoria (ESV) for providing the opportunity to comment on the proposed remake of the Electricity Safety (Installations) Regulations (the Regulations).

Recommended edits to S303C of the proposed Regulations:

ADAVB urges ESV to consider making alterations to the proposed Regulation 303C, as follows:

The phrasing for S303C of the proposed updated Regulations places the onus for ensuring compliance with AS/NZS 3003 on dental practice owners and operators. However, dental practice owners/operators would not be in a position to know whether electrical work conducted by a licenced electrician is compliant. ADAVB therefore urges that S303C be changed as follows (edits inserted in red italicised text), to specify that practice owners/occupiers must take all reasonable measures within their control to ensure compliance with the Regulations:

- (1) The occupier of any premises that contains a patient area or an area that is intended to be a patient area must *take all reasonable measures to* ensure that—
 - (a) any electrical installation installed in the patient area or any installed, altered, repaired or maintained portion of an electrical installation located in the patient area complies with AS/NZS 3003; and
 - (b) any electrical installation located in the patient area is safe and maintained and operated safely.
- (2) A person who commissioned electrical installation work on any premises that contains a patient area or an area that is intended to be a patient area must *ensure that*—
 - (a) *take all reasonable measures to ensure that* any electrical installation installed in the patient area or any installed, altered, repaired or maintained portion of an electrical installation located in the patient area complies with AS/NZS 3003; and

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(b) *ensure that* the registered electrical contractor or licensed electrician commissioned to carry out the electrical installation work in the patient area is given written notice prior to the carrying out of that work—

(i) that the work requires or includes electrical installation work in a patient area or an area intended to be a patient area; and

(ii) detailing the location and boundary of the patient area; and

(iii) detailing the use or intended use of the patient area.

Recommendation to develop a fact sheet to assist health practice owners and operators to comply with the Regulations:

- ADAVB notes that AS/NZS 3003 and other Standards referred to in the proposed Regulations are not available free of charge and would not be readily accessible to dental practice owners and operators. ADAVB therefore urges ESV to create a fact sheet to clearly explain the definition of a ‘patient area’, and ‘low-voltage medical equipment’, and include a plain language explanation of any other essential information for dental practice proprietors about compliance with electrical safety standards and the Regulations. ADAVB would be pleased to work with ESV to create such a resource.

Comments on the Proposed Exemptions Order, items 24 and 25:

- ADAVB supports these proposed exemptions and the examples of the circumstances under which they would apply. This provides clarity that the installation of low voltage medical equipment in patient areas does not require a licensed electrician if the equipment is to be plugged into an existing electrical socket, unless the manufacturer’s instructions direct otherwise.

If you have any further queries, please do not hesitate to contact ADAVB.

Sincerely,

A handwritten signature in black ink that reads 'Matt Hopcraft'. The signature is written in a cursive style with a large, looped initial 'M'.

Matt Hopcraft

Chief Executive Officer