

27 February 2009

The Registrar
Electrical Workers Registration Board
PO Box 10156
Wellington

by email: trish.tchernegovski@dbh.govt.nz

SUBMISSION ON PROPOSED CATEGORIES OF REGISTRATION

- 1 Orion New Zealand Limited (**Orion**) welcomes the opportunity to comment on the third discussion paper on proposed categories of registration (the **paper**) released by the Electrical Workers Registration Board (the **Board**) in November 2008.

In general Orion supports the proposals in the paper

- 2 In general we support the proposals in the paper and are pleased to see that many of our earlier concerns have been addressed in the paper.

Electrical engineer registration

- 3 However we are concerned about the proposed fundamental change to section C of the paper, which relates to the category of electrical engineer registration.
- 4 In the earlier discussion paper (released in May 2008), the registration requirements for future registration in the electrical engineer category (section E) included:

...that person has obtained a qualification in electrical engineering (i.e. Bachelor of Engineering (Electrical) or National Diploma in Engineering (Electrotechnology) (Level 6)), or New Zealand Certificate in Engineering (Electrical) or equivalent....

- 5 We agreed with this approach.
- 6 This requirement is now severely limited in the new section C which states:

...that person has obtained a Bachelor of Engineering (Electrical) qualification....

7 We are very concerned that the benchmark is proposed to be set at NZQA level 7. We believe that this should be set at NZQA level 6.

8 Historically in this country there have been opportunities for people to progress from a trades background into engineering, through an academic qualification coupled with sufficient experience. BE, NZCE, and now NDE Level 6, have been recognised as appropriate qualifications for a career in engineering, when coupled with **appropriate experience**. Legislation dating back to the Engineering Associates Act 1961 has provided avenues for this career path, alongside the more academically based programme recognised in the Engineering Act 1924 and the Electricity Act 1992. This historical approach has worked well.

9 Under the proposed section C, these 'trade-based engineers' would not be eligible for registration in the electrical engineer registration category, as they do not all hold a BE. This restriction seems contrary to the Board's stated intent to provide a registration and licensing regime that:

...will be more flexible to allow for specialist registration categories and for competencies to be specified for the particular work authorised under each registration category.

10 In a competency-based safety system, it seems appropriate that a restrictively high level of academic qualification should not be the benchmark for an electrical engineer category. As an alternative to a BE NZQA Level 7, we suggest NDE (or similar) to the equivalent of NZQA Level 6 should also be sufficient when coupled with relevant practical experience, as has been recognised by New Zealand's historical approach to trade-based engineering.

11 This suggested approach would mean that:

11.1 a qualified person could gain registration in this category and work on prescribed electrical work provided that they satisfy the proposed practical and regulation knowledge requirements; and

11.2 a person who has already met the minimum requirement for working on prescribed electrical work by obtaining electrical registration (NZQA level 4) and has obtained a BE Level 7 or NDE Level 6 could gain registration under this new category without further practical work, since the issue is associated with working on **prescribed electrical work**. In Orion's experience, people in this category

usually progress from electrical installation work with a high level of prescribed electrical work, to design, project management and general engineering work with some degree of prescribed electrical work and supervision of that prescribed work.

- 12 We consider that all engineers who have progressed, or are progressing, from a trades background into engineering positions through obtaining a BE or NDE Level 6 should be eligible to perform prescribed electrical work in the new registration class. Their competency would be adequately assessed through the relevant exams, assessments and tests prescribed in the remainder of section C.¹
- 13 A number of Orion employees are in this position currently, and seven electricians coming through our engineering trainee programme will soon be in this position. In all cases, these trainees will have worked on prescribed electrical work for a minimum of 10 years by the time they have completed their qualifications and the other requirements of our practical training programme.
- 14 We believe that any safety and competency-based registration regime should recognise and provide for registration of these workers and others like them who can safely carry out prescribed electrical work. In our industry, competency is gained through experience coupled with qualifications. A combination of 'academic' and 'practical' engineers works well. It is important that the practical-based career path is not inhibited by an inability to gain registration as an electrical engineer. The contribution of these practical engineers to the industry should be recognised through an appropriate registration mechanism.
- 15 We also believe it is vital to retain flexibility in a tight labour market and avoid unnecessary career blocks where possible, particularly when safety is not compromised. The electricity industry has traditionally attracted a mix of people, some of whom are academically-orientated, while others learn through a more 'hands-on' approach. Both groups of employees are valuable. Companies like Orion recognise the value of both groups, and make the long-term investment to train electrical workers in the practical aspects of engineering work, whether this is supplemented by NDE or BE qualifications.

¹ We assume that the "practical examination" and "three stage assessments" referred to in section C would adequately assess a person's practical experience; however we are unclear about the content of these tests. It may be necessary to include more specific **practical experience** prerequisites and requirements in section C. It seems logical that the Board should set the minimum practical requirements for all those who are seeking registration and that where a person is already allowed to work on all prescribed electrical work, then that person should automatically meet those practical requirements.

- 16 Implementing the proposed section C would disadvantage electrical workers who have (or who are working towards) engineering competency achieved through a mix of academic achievement and practical experience.
- 17 Our review of the summary of submissions received in relation to the May 2008 discussion paper shows that only one of the 69 submitters disagrees with our suggested approach.


Recommendation

- 18 We recommend that the original proposed wording be used in relation to the requirements of the electrical engineer registration category, as follows:

...that person has obtained a qualification in electrical engineering (i.e. Bachelor of Engineering (Electrical) or National Diploma in Engineering (Electrotechnology) (Level 6)), or New Zealand Certificate in Engineering (Electrical)) or equivalent....

- 19 Thank you for the opportunity to make this submission. If you have any questions, please contact John O'Donnell at DDI 03 363 9781 or email john.odonnell@oriongroup.co.nz.

Yours faithfully



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