



4 June 2021

Health and Safety Policy
Workplace Relations and Safety Policy
Ministry of Business, Innovation & Employment
PO Box 1473
WELLINGTON 6140
Email: EnergyStandards@mbie.govt.nz

To whom it may concern

UPDATING THE REFERENCES TO STANDARDS - ELECTRICITY AND GAS SAFETY REGULATIONS

I write in support of the Electrical Engineering Group's submission to the Ministry of Business, Innovation & Employment's (MBIE)'s consultation *Updating the references to standards in the electricity and gas safety regulations*. The Electrical Engineering Group is a Technical Interest Group of Engineering New Zealand. Engineering New Zealand supports the position taken by the Electrical Engineering Group in its submission to MBIE. I note that they are largely in support of MBIE's proposals but have a couple key points of feedback.

Public availability of reference standards

The Electrical Engineering Group rightfully point out that standards referenced should be publicly available to industry free of cost. Payment for standards creates a barrier to access. Barriers to access limit the uptake of the information contained in the standard. This impacts the decisions made and ultimately has the potential to negatively impact health and safety.

Designer registration with the Electrical Workers Registration Board

Under question one, the Electrical Engineering Group have recommended the registration of electrical designers under the Electrical Workers Registration Board. We support this recommendation in principle, recognising that there is currently a regulatory gap in the regulation of these designers.

MBIE is currently consulting on the wider occupational regulation of engineers. Engineering New Zealand supports MBIE's work to strengthen the regulatory system for engineers. Should MBIE's proposals proceed, it is our view that electrical engineers should be captured under the regulator

established, and not the Electrical Registration Board. This ensures electrical engineers are regulated in a manner consistent with their contemporaries.

Next steps

If we can be of any assistance, please do not hesitate to contact me by emailing richard.templer@engineeringnz.org or 021 22 000 50.

Yours sincerely

A handwritten signature in blue ink that reads "R. Templer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr Richard Templer
Chief Executive