

**Public comment response template to Discussion Paper: Maintenance of Competence for Practising Certificates**

Please send submissions by email to [consult.minesafety@industry.nsw.gov.au](mailto:consult.minesafety@industry.nsw.gov.au)  
Submissions must be received by the due date of Monday 1 February 2016.

**Name: David Granger - Electrical Engineer's Certificate of Competency UG 391**

**Organisation (if applicable):**

**Responses to discussion points**

1. Is the proposed model for the MOC scheme suitable for application for practising certificate holders in NSW?

Response: Yes in principle. This model assumes that practicing certificate holders are employed directly in the mining industry throughout the five year period and that it is reasonable to expect a person or company to incur the expenses involved under the MOC scheme. Due to the state of the mining industry, it is now common for people to transition out of, and back into the industry. It is not reasonable to expect a person or employer to meet these costs whilst they are out of the industry. Experienced people do not lose their knowledge over night and can quickly become current again given the opportunity. The model should make allowance for this. Some suggestions to assist in this area - allow certificate holders not employed by a mining company to attend Department seminars and workshops at no cost. Allow persons not employed by mining companies to miss the minimum hours per year as long as they pick them up when they re-enter the industry (within the life of their practising certificate).

2. Are the areas of competence and their topics suitable and cover the areas adequately?

Response: No. Part 7 of the document states that a person must complete the minimum number of hours in each of the four areas. I have not been able to find where the number of hours in each area is specified in the document. The areas are not balanced, it will be much easier to achieve formal hours in some areas than others. The minimum hours per area split should take this into account.

3a. Are the types of formal and informal learning with their maximum claimable hours suitable?

Response: No. Taking into account the nominated limits on claimable formal hours the total is too high, either lower the number of hours or allow higher totals for industry seminars etc. eg. Participation in a Standards Australia committee where there could be several meetings per year should be able to achieve the total formal requirement.

3b. Is the percentage split between the minimum number of formal hours (66%) against a maximum of 33% for informal hours appropriate?

Response: No. The formal hours are much more difficult to achieve around the demands of the job. When you are away from the mine you are not doing your job. Suggest allowing a different ratio with a greater weighting on the formal hours. Give people an opportunity to offset them with more hours of informal as this can fit better within the work schedule.

4. Are the numbers of learning hours for each practising certificate and areas of competence appropriate to maintain competence a) per year b) over five years?

a) per year - response The proposal adequately identifies that some positions require more work than others. Flexibility in the per year requirements needs to be given as suggested in question 1 response.

b) over five years? - response Yes

5. Are the requirements for certificate holders in the MOC scheme reasonable and practical?

Response: No. People that have been working in front line management or supervisory roles for over 20 years will not get a lot of benefit from training in management techniques so why force them to do this. Their hours would be better spent on technology type training. Experienced people like this are valuable in the industry. Overall there would be more benefit to the industry as a whole if these people could be involved in mentoring younger people still developing in their careers. A lot of this is informal work and should be able to count towards a greater percentage of the total hours requirement.

6a. Are the record keeping requirements for certificate holders to satisfy in the MOC scheme reasonable and practical?

Response: No. The scheme requires a person to achieve a minimum number of hours in each year. If at the end of the five years an application for renewal can be rejected because any single year is deemed not to have complied then a person could become unemployed due to the loss of the practicing certificate. To prevent this situation occurring certificate holders must be able to check that the current year has satisfied the criteria, and if not, then have an opportunity to redress the situation at the time. eg. perform extra hours in the subsequent years.

6b. Are the governance processes proposed by the department adequate to ensure compliance with the MOC scheme by practising certificate holders?

Response: Yes