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Lodged electronically

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## **DR AS 5358.1.1 Photoluminescent exit signage: Product Specification, Installation, and Operation**

The National Electrical and Communications Association (NECA) welcomes the opportunity to provide general comments to Standards Australia on DR AS 5358.1.1 Photoluminescent exit signage: Product Specification, Installation, and Operation.

NECA is the peak body for Australia's electrotechnology sector, which employs 170,000 workers and turns over more than \$23bn annually. We represent almost 5,500 businesses performing works including the design, installation and maintenance of electrical and electronic equipment in the building, construction, mining, air conditioning, refrigeration, manufacturing, communications and renewables sectors.

NECA's member businesses help millions of Australians to design and create homes and workplaces that utilise technology, are innovative and sustainable. They are at the face of supporting consumers to install, operate and maintain electrical systems that reduce consumption, emissions and overall costs.

NECA and our members value safety above all else. This includes safety for industry workers and public safety in the application and effectiveness of performed works and installed products.

NECA does not feel appropriate consultation has been undertaken with stakeholders and the general public to satisfy the public interest test of endorsing Photoluminescent (PI) signage as an appropriate way-finding tool in emergency situations. NECA believes groups such as firefighters and other first emergency responders; teachers; disability advocacy groups; and nurses, aged care workers and other frontline health services should all be proactively engaged by Standards Australia in the evaluation of these products. It's these people who will be risking their lives in an emergency to ensure the safe evacuation of the elderly, unwell and other vulnerable people. These consultations should include practical demonstrations and live

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scenarios that cut through the technical style of written standards and present an accurate picture to these key stakeholders.

There seems to be consensus across industry that PI signage in its current state provides a fraction of the brightness and visible way-finding over distance compared to electrified equivalents. There is doubt over PI signs ability to illuminate through smoke, and the measurable decrease in brightness over a short period of time during a complete power outage.

NECA believes there is a lack of independently verified, scientific research to validate whether inferior brightness and increased risk to public safety is outweighed by minimal energy savings. Particularly given the context of advancements in LEDs and other energy efficient globes which have greatly decreased the power required for wired emergency and exit lighting.

NECA is concerned by the seemingly expedited process for drafting and considering DR AS 5358.1.1, and the formation of a new Committee to consider this standard in isolation from other electrical advisory committees. We believe there are a number of fundamental safety and technical issues that need to be addressed by the Standards Australia process before our member businesses could recommend to consumers that PI signage is completely safe and fit for purpose. Until such time we oppose the progression of this draft standard in its current form.

The building and construction industry is littered with case studies of products and processes that have caused harm when emerging technology and proclaimed innovations are rushed into the market without proper due diligence.

Should you wish to discuss this submission further or invite additional comments or information from electrical contracting businesses, please contact me on 0439 707 101 or via email [peter.mccabe@neca.asn.au](mailto:peter.mccabe@neca.asn.au).

Yours sincerely,

**Peter McCabe**

**Director Policy and Government Relations  
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## About NECA

The National Electrical and Communications Association (NECA) is the peak body for Australia's electrical and communications sector, which employs 170,000 workers<sup>1</sup> and turns over more than \$23bn annually.<sup>2</sup> We represent almost 5,500 businesses performing works including the design, installation and maintenance of electrical and electronic equipment in the building, construction, mining, air conditioning, refrigeration, manufacturing, communications and renewables sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years. We help members and our industry operate their businesses more effectively, and represent their interests to all levels of government, regulators and other bodies such as the Australian Chamber of Commerce and Industry (ACCI) and Standards Australia.

NECA members make an essential economic contribution – connecting businesses, homes and infrastructure – encouraging investment, improving reliability and energy security, and delivering affordable, environmentally sustainable outcomes. The safety and reputation of our industry is critical to all tradespeople, consumers, and the community.

NECA is integral to the next generation of electrical contractors. Through our Registered Training Organisations (RTOs) and Group Training Organisations (GTOs), we offer employment and skills development to some 4,800 apprentices nationally. Our success is clear: we proudly boast 90% completion rates across our courses, with roughly one in three licensed electrical workers starting their career as a NECA apprentice.

NECA helps attract entrants to our industry through holistic, high-quality, industry-relevant programs including our scholarship program, the NECA Foundation, and the Women in Electrical Trades Roadmap. We proactively seek diverse workforces, supporting female, indigenous and mature aged apprentices, and promoting career paths for school students and school leavers. We also operate the industry-wide NECA Annual Excellence Awards, which acknowledge and celebrate achievements and distinguished electrotechnology projects, and NECA's Apprentice Awards, recognising future leaders in our industry.

NECA continues to monitor and respond to the Coronavirus (COVID-19) crisis on behalf of our members and the electrotechnology sector, and is working with industry, government and the community to achieve a COVID-19 safe economy and swift national recovery.

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<sup>1</sup> Australian Government 'Job Outlook'. (July 2020) (Telecommunications Trades Workers) <https://joboutlook.gov.au/Occupation?search=alpha&code=3424> and (Electricians) <https://joboutlook.gov.au/Occupation?search=alpha&code=3411>

<sup>2</sup> Ibis World 'Electrical services in Australia Industry Statistics (May 2020) <https://www.ibisworld.com/au/industry/electrical-services/325/>