

From: [REDACTED]@dbyd.org.au>
Sent: Thursday, 10 October 2019 12:19 PM
To: Consultation
Subject: Regulatory Impact Statement - Proposed Electricity Safety (General) Regulations 2019

Dial Before You Dig Vic/Tas is a not-for-profit organisation in operation since 1989 delivering a vital community service to assist in preventing damage and disruption to Australia's vast utility networks which provide essential services used every day. Dial Before You Dig is a free referral service that connects all persons working in and around buried infrastructure with the best possible access to plans and information direct from asset owners of those services.

Our objectives as an organisation are to:

- Assist in the protection of anyone against possible injury or death as a result of digging near underground infrastructure.
- Ensure Australia’s underground infrastructure is protected.
- Reduce the number of accidental strikes and subsequent disruption to essential services.
- Assist in the prevention of financial loss as a result of damage to member assets.

Use of the free Dial Before You Dig service is currently only voluntary for both tradespeople and private landowners. The Dial Before You Dig referral service is a proven, useful step in starting the process of safe excavation, yet we have seen a recent increase in instances where services have been disrupted. The community impact when damage occurs is certain, and leads to financial and personal loss, costly service repairs and investigations following these types of incidents.

It is often the case that assets are not buried as deep as expected. This may be due to erosion, landscaping etc. As such relying on a safe excavation depth may be incorrect. As the asset depth may have changed over time.

Our comments on the RIS – Proposed Electricity Safety are specifically concerned with - **608 Protected infrastructure—excavating.**

The current requirement assumes all asset are deeper than 300 millimetres, as indicated above this is not always a correct assumption.

Dial Before You Dig Vic/Tas recommends that the requirement should be strengthened to be consistent with AS5488.

As such we recommend the following (or similar) should replace CI 608.

608 Current	608 Proposed
<p>1. A person must not make an excavation deeper than 300 millimetres on public land unless the person—</p> <p>(1) A person must not make an excavation deeper than 300 millimetres on public land unless the person— (a) has inspected— (i) the register kept by the relevant distribution company under</p>	<p>(1) A person must not undertake excavation on public land unless the person has taken reasonable care to identify and locate underground assets prior to excavating.</p> <p>(2) As a minimum requirement, Quality Level D information from AS5488 should be used to establish the potential presence of subsurface utilities within an area of excavation.</p>

section 77(1) of the Act; and (ii) the register kept by the relevant person who operates a railway under section 76(2) of the Act; and (b) has located any underground protected infrastructure in the vicinity of the excavation.

- (3) The information required for Quality Level D information may be sourced through a “Dial Before You Dig” enquiry
- a. The person has then inspected—
 - (i) the register kept by the relevant distribution company under section 77(1) of the Act; and
 - (ii) the register kept by the relevant person who operates a railway under section 76(2) of the Act; and
 - b. has located any underground protected infrastructure in the vicinity of the excavation.

Kind regards,

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