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### **ECASA's Stout Opposition to Government Interpretation on ETSP's Role in PV Installations**

The Electrical Contractors Association of South Africa ECA(SA) strongly expresses opposition to a Department of Employment and Labour Interpretation numbered OHS 3/1/5/7/9 (DoEL) named *'Interpretation on EIR and SANS 10142-1 Annex M'* regarding the role of Electrical Tester of Single Phase (ETSP) in issuing Certificates of Compliance (CoC) for the direct current (DC) portion of photovoltaic (PV) installations.

#### **Background and Context**

Over the past several years, there has been ongoing debate and confusion regarding the scope of work that ETSP's are authorised to perform. ETSPs have always been confined to issuing CoC's for the alternating current (AC) portion of electrical installations, including those fed from an inverter. This restriction is congruent with their training.

After an appeal against the ECA(SA) in March 24, the DoEL presented its findings a year later, which contained several significant fundamental errors.

#### **ECA(SA)'s Stance**

The ECA(SA) has always stood against the inclusion of DC in the scope of the single-phase tester and has given full, detailed reasoning on the matter to the public and the DoEL. As of yet, none of these concerns have been met or addressed by the DoEL; these include the following main concerns:

- Competency of the Single-phase tester
- The interpretation that the single phase in the regulations includes DC
- Safety concerns around the higher voltages and the mixture of voltage types
- Devaluing of the IE and MIE registrations

ECA(SA)'s position on the recent DoELs interpretation concerning ETSP's in photovoltaic (PV) installations is rooted in significant concerns about safety, regulatory compliance, and quality assurance. The association calls for a concerted effort to maintain the standards that protect the electrical industry and ensure the safety of all electrical installations. Furthermore, ECA(SA) will not accept the current interpretation unless the DoEL officially confirms that single-phase testers have the necessary skills and legal authority to issue CoC's for DC

installations. Importantly, the DoELs announcement on March 6, 2025, does not explicitly authorise single-phase testers to issue COC's for installations involving DC voltages.

### **Call to Action**

ECA(SA) strongly urges all stakeholders, including government representatives, industry professionals, and the public, to respect the existing regulations and standards governing the electrical industry. Any modifications to these regulations should be pursued through the appropriate legislative channels, ensuring that the safety and integrity of electrical installations are not compromised. This must include changes in the training curriculum of ESTPs. As things stand, they are not trained to do the work that the DoEL says they can certify. We cannot agree.

The Department does not carry the final say on the interpretation of law as this is the function of the Courts. It is disturbing that this interpretation by DoEL was arrived at without giving the Association a hearing. This interpretation cannot replace existing legislation.

We also call on our members to ensure that their clients are aware of this bad interpretation and must not allow unqualified people to do work in their properties. Those that become victims of this misthinking are encouraged to sue as this is really a reckless position adopted by DoEL. We remain available to engage.

### **Conclusion**

The ECA(SA) will formally appeal the matter at hand. This action is undertaken to guarantee that a fair and just process is observed, and to ensure that all pertinent concerns are addressed in accordance with the appropriate procedural guidelines. In the meantime, the ECA will not accommodate this interpretation in our documents, including but not limited to PV CoCs. Do not wait for us to amend our CoC's to accommodate this interpretation. We will not do it and we will not be complicit in endangering the lives of the Citizens of this Country. We do so because we care. You cannot train a person to drive a scooter and then on the strength of this training, give him permission to drive a horse and trailer. In the event of an accident no insurance will pay. The same goes for this interpretation.

Issued on behalf of the Electrical Contractor's Association by:

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