

PUBLIC STATEMENT

ECA(SA) Position on AMEU SSEG Compliance Paper and Related Media Reporting

Date: 24/11/2025

Issued by: Electrical Contractors Association of South Africa (ECA(SA))

For Immediate Release

Introduction

The Electrical Contractors Association of South Africa (ECA(SA)) has carefully reviewed the AMEU Position Paper on “Safety Compliance for Low Voltage Small-Scale Embedded Generation (SSEG) Installations up to 1 MVA” dated 14 November 2025, along with the media coverage and public discussion it has generated.

While ECA(SA) fully supports efforts to enhance safety standards in embedded generation installations, we have identified several fundamental concerns in the AMEU paper that need addressing. Without proper clarification, these issues risk creating regulatory confusion, practical conflicts, and unjustified obstacles to legitimate renewable energy uptake.

1. Statutory Competency under the Electrical Installation Regulations

The Occupational Health and Safety Act and the Electrical Installation Regulations (EIR) establish clear legal parameters for competency in testing, inspection, and certification of low-voltage electrical installations.

The facts are straightforward:

- Registered Persons hold legal authority to issue Certificates of Compliance (CoCs)
- Competency standards are set and regulated by the Department of Employment and Labour
- Municipalities have no legislative mandate to override or redefine these statutory competencies
- Municipalities cannot enforce standards or requirements that do not directly impact their supply.

Any suggestion that Registered Persons lack the competence to certify SSEG installations directly contradicts existing legislation.

2. Standards Compliance and the Withdrawal of SANS 10142-1-2

The AMEU paper raises concerns about the need for additional engineering oversight following the withdrawal of SANS 10142-1-2.

However, a robust compliance framework remains fully operational through:

- SANS 10142-1
- SANS 60364-7-712
- The Electrical Installation Regulations (EIR)

The temporary absence of a standardized SSEG commissioning report annex doesn't invalidate existing safety obligations or undermine established professional competencies. The South African Bureau of Standards (SABS) is formally adopting a test report and expanding its requirements. These changes could have been implemented sooner if all parties had collaborated and adhered to the existing requirements.

3. Alignment with Eskom's National Compliance Direction

Eskom's media statement of 21 October 2025 provides important clarity:

- Residential SSEG installations may be certified by a Department of Labour Registered Person
- Professional engineering sign-off is no longer mandated for LV rooftop solar systems
- A CoC combined with a standard Embedded Generation Interface (EGI) test report satisfies compliance requirements

This position confirms three critical points:

- Registered Persons retain complete statutory authority
- Engineering approvals aren't required for safety purposes
- Accessibility and affordability are priorities in the national energy transition

Municipal requirements that go beyond this approach would contradict national policy direction and create barriers where none are needed.

4. Municipal Discretion and National Uniformity

The AMEU position implies that municipalities may introduce their own technical requirements. Such an approach creates serious risks:

- Inconsistent enforcement across different jurisdictions
- Legal uncertainty for installers and consumers
- Unnecessarily higher costs for households
- Artificial barriers to legitimate PV adoption

Electrical safety standards cannot vary between municipalities. The OHS Act requires national consistency.

5. OUTA Public Position and Consumer Protection Concerns

The Organisation Undoing Tax Abuse (OUTA) has publicly advocated for compliance frameworks that respect national legislation and standards, cautioning against excessive municipal enforcement.

Their concerns mirror broader industry and consumer apprehensions:

- Local interventions outside SANS and EIR frameworks lack legal basis
- Additional approval layers increase costs without delivering improved safety
- Lower-income households would face disproportionate disadvantages

This position aligns closely with ECA(SA)'s commitment to enabling safe, equitable access to embedded generation.

6. Path Forward: Collaboration and National Alignment

ECA(SA) recently took part in a meeting convened by SABS with Eskom to discuss SSEG standards implementation. The outcome was constructive: updated commissioning test report requirements will be formally incorporated into:

- SANS 10142-1 Edition 3.3
- Expected publication: First half of 2026

This establishes a clear, nationally consistent route to formalise documentation requirements without requiring interim municipal interventions.

ECA(SA) believes urgent coordination is needed between:

- ECA(SA)
- AMEU
- Department of Employment and Labour (DoEL)

- SABS
- NERSA
- SAPVIA
- AREP
- ECB
- Eskom and other licensed distributors
- NRS Association
- Other Industry Associations and Stakeholders

Such coordination is essential to prevent conflicting requirements and maintain regulatory certainty around safety compliance.

Conclusion

ECA(SA) cannot support the operational enforcement of the AMEU position paper in its current form. The document contains legal inaccuracies and would impose unwarranted administrative and financial burdens on both industry and consumers.

We urge municipalities, industry bodies, and media outlets to ensure their communications and enforcement practices align strictly with the national regulatory standards like the OHS, EIR, EMR, GMR, SANS 10142-1 and 60364-7-712, while supporting safe, lawful, and affordable access to embedded generation for all South Africans.

Issued by:

Grant Seeman

grant@ecsasa.co.za

National Technical Advisor / Secretary

Electrical Contractors Association of South Africa (ECA(SA))