Special Edition Fess and Levy Review 5 October 2012

TABLE OF CONTENTS

Introduction

It's very important we all have our say in the current fees and levy consultation. We know most of you are sick of making submissions and nothing being listened to or changed but we must persevere.

Please read this submission carefully and forward it to the Board by 9 October 2012 as per the instructions at the bottom of the page.

Kind regards

Wal Gordon
Chairman Plumbers Gasfitters and Drainlayers Federation

SUBMISSION TO THE PLUMBERS, GASFITTERS & DRAINLAYERS BOARD

1. Do you support the Board purchasing the standards commonly used by plumbers, gasfitters and drainlayers so that they can be accessed online by tradespeople?

No

I oppose the proposal of the $5 for standards as recommended by the Boards – mainly because it is only usable through lap top and tablet, it cannot be downloaded for printing off.

Most practitioners do not carry lap tops or tablets with them to the job and Smartphone screens are simply too small to be of use in this matter.

The standards are the most common held by practitioners. Although $5 per license, the Boards recommendation is around $75,000.00 as a whole. If there were a wider group of standards available and they were downloadable and printable then it may be useful, but as it stands then I oppose the proposal.

I also believe the offering of standards is a smoke screen to divert practitioners from the other matters in the fees proposal.

2. Do you support the introduction of the fee for trainee limited certificates?

NO

other matters relating to this review?

The Board seems to be extracting money from Tradespeople for no services provided.

They put forward the argument that if the $45 fee does not go ahead then the normal registered person's license will be required to increase by $12 to cover the cost.

This is garbage as "The Cost" if any at all was already part of the registered persons license fee and as such should the $45 limited certificate fee go ahead then there must surely be a "REDUCTION" of $12 from the license fee of every registered person, that's basic accounting.

In reality the Board is picking up a bonus $45 from apprentices and increasing the registered persons fee by holding onto their $12 calculation.

In one simple move they have converted a non existent cost and fee into a $57 revenue stream.

3. Do you support the proposal to cross-subsidise the registration application fee from licence fees?

No

I do not support cross subsidizing, what I want to see is the Board re-visit their costs. I am gob smacked that 3 years ago they were saying the true cost of registration for first timers was $1,433.00 and they wanted us to cross subsidize that, and now it is $500 and they want us to cross subsidize that.

The $1,433.00 was subsidized by $61.00 per license for the last review which now leads us into very muddy waters with $61.00 of the current licensing fee already being for registration. This $61.00 now seems to have been absorbed into the cost of licensing and the Board is asking for an additional cross subsidization.

First time registration should not mandatorily require a copy of the registration certification if this will reduce costs and should be no more than a re-license cost.

4. Do you support the following proposed fees and levy?

- Annual license fee **No**
- Annual trainee limited certificate fee **No**
- Registration application fee **No**
- Disciplinary Levy **No**
- Offences fee **No**
- Exemption fee **Yes**
- Examination Entry Fee **No**
- Fee for reconsideration. **No**
- Employer license application **No**
- Advanced proficiency assessment **Yes**
- Fee for providing a copy of gas certificate **No**

5. Please explain why you support or oppose any of the proposed fees and levy

Annual license fee is not supported and I believe it is based

on false and misleading information. It appears the industry is being overcharged and insufficient factual information has been provided. This original fee was based on a $61.00 cross subsidization for registration and now that subsidization should be gone hence reducing the licensing fee.

Annual trainee limited certificate fee is not supported and I believe it is based on false and misleading information. This fee never existed before and any services, if any, were covered from the annual licensing fee which should reduce if this fee is introduced.

Registration application fee is not supported as it is too high and is a barrier to entry. There has been no evidence of the costs provided to the industry and I believe the fee has not properly been accounted or thought out

Disciplinary Levy is not supported and I believe it does not reflect the true cost of discipline and contains costs that are not costs arising out of investigations into registered people.

Offences fee is not supported and I believe it does not reflect the true cost of enforcement and contains costs that are not costs arising out of investigations into non registered people.

Exemption fee is supported but should reflect actual costs.

Examination Entry Fee is not supported. This fee imposes a barrier to entry into the industry and no evidence of costs has been provided.

Fee for reconsideration is not supported. This fee imposes a barrier to those wanting re-consideration

Employer license application is not supported. I believe this encourages employers to use this license rather than individuals licensing thereby leaving the individuals at risk should they do any work at home, or anyone else's house.

Advanced proficiency assessment is supported but only for actual costs.

Fee for providing a copy of gas certificates is not supported as the industry have already paid for this system years ago. I agree to charge the public an actual cost but not practitioners.

6. What changes would you like made to the proposed fees and levy and what are your reasons for that? Do you wish to comment on any other matters relating to this review?

I believe this review has failed to reach the standards to be considered consultation and the information provided has been misleading and jumbled.

Based on the information there is no way I could make an informed decision however there are a few points I wish to make:

• Any overcharged disciplinary levy should be returned to

practitioners.

• Memorandum accounts should be introduced immediately

• The Disciplinary levy should reflect actual costs arising out of investigations into registered people. These should change yearly based on the previous year's performance.

• The Offences fee should not exist and should be funded from elsewhere.

• The Board need to re-visits costs and take more measures to cost cut.

To submit this to the Board by 5pm 9 October 2012 simply click on the forward button at the top right of this document complete your details and the Boards address submissions@pgdb.co.nz as follows:

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