

## Submission from Auscoil

Good Morning,

My sincere apologies for the lateness of the feedback but I wanted to give our perspective as a predominantly Coil Tubing Service Provider.

Question 3: There is a need to broaden the scope of the competency framework to include at a minimum Coil Tubing. We are required to comply with the Drilling and Well Servicing Competency Standard; however, it is not clear who this applies to, and we must map our roles/ positions to those of drilling and well servicing rigs. More importantly, the well servicing qualifications are written/ tailored specifically too workover rigs and while some of the questions/ scenarios can be bridged to CT operations our personnel have a difficult time doing so. There are units of competency such as Gast Test Atmosphere etc that are relevant to us, but these are minimum competency requirements within our framework and to meet Safer Together/ Client requirements so in most cases these are held before any field exposure or enrolment in qualifications (in this case RPL is granted). Generally, we are not receiving the value that is intended of the competency standard from the RTO qualifications as Coil Tubing personnel/ equipment/ activities are not the target audience.

Question 7: The RII framework is not fit for purpose with regards to Coil Tubing activities, it would be ideal for the RII framework to allow for and the RTOs to develop qualifications (cert II, III, IV and diploma) written/ tailored and mapped specifically for Coil Tubing.

Question 8: There needs to be a level of flexibility in terms of the competency and qualification level held by any given Supervisor. For example; a Supervisor may hold a Well Servicing Diploma who is directly supervising a 'trainee' (equipment operator) who is enrolled in a Well Servicing Cert II or III but may not hold a Cert II or III himself. We have had experienced personnel join the business who do not hold any qualifications and it is not practical to start them at a Cert II and work through 8 workbooks (Cert III/ IV/ Diploma) to achieve the Diploma level that is required of the role at the current time. Does holding a Diploma level qualify a Supervisor as competent to directly Supervisor a lower level qualification without holding it themselves? It seems other Coil Tubing companies have not integrated the competency standard into their training framework which makes it difficult abide by any prerequisite requirements and demonstrate competency for direct Supervision if this is not acceptable. The Rig and Well Servicing companies have the depth as they have been onboard with the Competency Standard from its inception. However, the Coil Tubing community is very small and it seems adoption has not occurred in the same manner. Whereas, we have always taken the compliance approach and attained the level of qualification required for our personnel.

Question 13: It has been difficult from experience to demonstrate RPL based on experience alone (resume/ PD's) and limited on-site documentation from their previous roles for international or local personnel at a Cert IV or Diploma for Supervisors.

Many thanks,

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M [Redacted]  
E [Redacted]



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