Submission by

Gas Appliance Suppliers Association

to the

Australian Productivity Commission

on

Trans-Tasman Mutual Recognition Draft Report

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Contact:

Garth Wyllie
Executive Director
Gas Appliance Suppliers Association (NZ)
Private Bag 92-066
Auckland 1030
Ph 09 367 0913
Fax 09 367 0904
Email gas@iconz.co.nz
www.gasa.org.nz

BACKGROUND INFORMATION

The Gas Appliance Suppliers Association (GASA) membership is constructed of Manufacturers, Importers and Distributors and Retailers of Gas Appliances in New Zealand.
By volume it is estimated that the Association represents around 90% of Gas Appliances sold in New Zealand and has in its membership all large distributors of Gas Appliances as well as a wide range of smaller suppliers and some retailers.

There are presently some 2000 gas appliance models sold in New Zealand

As Gas Appliances are subject to an exemption this submission is based on explaining the New Zealand regime, the rational for it and the issues held with either harmonisation or mutual recognition.

GASA has developed a Code of Practice and along with the Energy Safety Service changes to the New Zealand regime to provide a robust but minimalist cost based regulatory system for Gas Appliances within New Zealand.

GASA is happy with the qualifications recognition between New Zealand and Australian Gasfitters allowing free movement of those in the industry.

Contact Information

Submitted by Garth Wyllie
Executive Officer
Gas Appliance Suppliers Association
Private Bag 92-066
Auckland

Telephone: 09-3670913
Facsimile: 09-3670914
E-mail: gas@iconz.co.nz
Web Site: www.gasa.org.nz

Submission

The Gas Appliance Suppliers Association believes that the overall context of our submission has been picked up correctly in the draft report and therefore endorses the majority of the report.

Specific Comment

Like with like Comparison
We are concerned however that a "like with like" measurement of the accidents and deaths between Victoria and New Zealand is not accurate and looks at all deaths and not those that relate to Gas Appliances. We would ask that this comparison be withdrawn unless an absolute like with like comparison can be included.

The deaths quoted for New Zealand include gas main workers, gas burners which were used against manufacturer's instructions and old appliances which nothing in either the Australian or New Zealand regimes could have altered.
Of those deaths involving gas appliances:

- 6 died through using a 15 year old camping burner/cooker in a closed car after the burner had been modified by the users resulting in the production excess CO emissions
- 2 died when using a gas light in a sealed tent specified by a Government Department and ignoring the written warnings of the manufacturer
- 1 died from CO emissions when an 18 year old water heater flue collapsed and blocked the CO from being vented due to lack of maintenance
- the balance died in miscellaneous accidents related to gas mains

While we are aware of some instances of accidents involving gas appliances we believe that all of these have involved either end users or gas fitters failing to adhere to the rules or instructions of the manufacturer. Such situations are not the fault of the Gas Appliance and can not be attributed to the New Zealand regime as in most cases the Gas Appliances involved are also approved and sold in Australia under the Australian regime.

Minimum Energy Performance Standards (MEPS)
GASA is concerned at the on going situation where EECA and state government agencies such as Victoria pursue independently Minimum Energy Performance Standards with no apparent regard to TTMRA and believe that all such moves should be subject to the widest consultation and to either harmonisation or mutual recognition as part of the overall process.
Documents released by both EECA and the Victorian State government in the past two weeks do not reflect any real consideration of TTMRA in that such documents should be joint releases and not put out by one country or the other in isolation.

GASA has no real objection to MEPS providing they are implemented equally in both countries at the same time and is happy to consult with regulators on both sides of the Tasman for this purpose.