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12 April 2013

The Director  
Wels  
GPO Box 787  
CANBERRA ACT 2601

Dear Sir or Madam,

RE – WATERMARK WELLS CERTIFICATION

At the introduction of the Wells scheme I registered one flow controller and as I recall for a fee of \$300 a year. The fee has now been increased to \$1,000 a year.

To anyone knowledgeable in the arts it is apparent that the fee's applying to a minimum of 10 products is designed to limit competition and in fact to completely eliminate an existing water saving range. In my view you are in breach of several anti-competitions laws while I am also of the view that all previous advice given by your department was deceptive and misleading.

I would refer you to the standard AS/NZS 3718: clause 4.6 that the required flow rate cannot exceed 2 litres a minute from 150 – 350kpa, in relation to flow controllers. The physics is such that the flow rate from 150 – 350kpa will double which very much eliminates the majority of existing water saving products over 6 litres with the exception of the disc with the "O" ring, which I personally believe is a totally inadequate device. In fact with material aging I doubt if even these existing devices would remain complaint after 6 months. Several years ago I pointed out to Wells that the overwhelming majority of flow controllers it had approved could not possibly be compliant, I received no reply.

Are you aware that you have effectively banned low pressure water delivery systems which are used throughout the World as a major method in water conservation.

It is also my understanding that the authors of this standard AS/NZS 3718 wrote 2 sections one for the compliant and one which exceeded the 2 litres a minute flow rate now a view conveniently not shared by Australian Standards and Wells. In any event Doust made a major investment in our Doustsave water saving range, a range well received by the public and at \$1,000 a year in licence fees it is no longer financially viable to participate in the existing Wels scheme.

I would be seeking some form of compensation for the deceptive and misleading advice that your department has given. I would also suggest that it is only a matter of time before litigation is commenced on the grounds that the current fees and standards have been introduced to serve a minority interest group and therefore they are not in the National interest.

In all my years dealing with Wells I have never received a reply to any complaint or suggestion submitted.

I am now of the view the only option for Doust is to remove ourselves from the Wells Scheme.

Kind Regards,  
Philip Doust  
Director  
Doust Plumbing Products

CC. Mr Greg Hunt MP, Mr Keith Burbridge.