

Submission re WELS Fees & Charges.

Since the introduction of WELS to the Water use in the Australian market several issues have become clear, and need to be addressed along with the very obvious point of why WELS was formed and what purpose and function it was meant to have and was that intention/purpose achieved.

Early years

From the beginning there has been an agreement of minds from Manufacturers, wholesalers, retailers, specifiers and end users that there is a requirement to have product approved for general use and where there is contact and use of water and in particular potable water there should be a recognised "approval centre".

That approval centre had been recognised as the Australian Standards. Since those early years, additional "testing approval bodies" have now been added, Water Mark, WELS and now ABCB (Australian Building Code Board). What additional "approval Centres with fees and charges are yet to be added to this certification costs cannot be underestimated. When history has proven ONE logical approval centre has now developed to FOUR with increasing fees & certification costs.

Whilst each of the "approval centres" have valid reason for their existence it fails to give logical reasons as to the validity of repeat certification and the added cost to manufacturers to have their product meet the requirement of this system.

Effect to industry

As recent as December 2012 one of Australia's quality tap manufacture, Accent Tapware had to close their doors and retrench all staff because of the continued increase and duplication of certification costs.

This small business operator has become another casualty in this senseless idea to "create" another reason to penalize this country's small business operators just for the sake of some ones "invented scheme" to make manufacturers pay wages to an organization for a repetitive product approval. No matter how one looks at this "repetitive approval" idea the basis must revert back to ONE approval centre & ONE fee.

The effect to this current repetitive certification & approvals will only result in those major players in the industry will remain because they can absorb these costs, which will result in less competition, less product choice (at higher prices to cover those fees).

This in time will result in less income to each of the existing Australian Standards Water Mark, WELS & ABCB as those surviving manufactures (mostly overseas companies) will pay those fees (which will be increasing) and reduce the variety of product to be accredited. This increase of fees currently approved to WELS is proof of the desperate steps taken by WELS to "stay in business" as the products previously approved/certified has reduced as the manufactures reduce their product range because of the fees and the lack of market demand.

WHY WELS

When Minister Greg Hunt introduced the Water Efficiency & labelling Standards Bill into Parliament in 2005 its foundation of idea was mutually accepted throughout most of the industry. In some States there was a need to reduce water consumption due to lack of good rain falls to dams and water storage that had depleted to its lowest level.

Unfortunately there was not sufficient investigation to its implication, application, long term effects to manufactures & consumers, loss of revenue to many areas, the legal boundaries to non compliance, and why was it made mandatory? And why was another “body formed” to implement the new “Standards” when it could have been part of Water Mark or Australian Standards.

Government’s responsibility.

The past performance of Governments throughout the States had help create this problem through lack of planning and failure to recognise their priorities. Most states had encourage the development of mining, increase in housing by increasing immigration while basic needs of food & water were not given the attention to support the basic needs of human existence. Residential areas now stand where vegetables were grown; farm properties are now freeways and housing communities, while the old dams and water towers remain with lower water levels.

The recognition of increasing water catchment areas or desalination plants or even long distance piping of water from large water deposits was deferred in lieu of other considered areas. Water use has now become a “catch up priority” but is only part of the “long term planning” that is required as this country grows. Unfortunately the basic needs of the community cannot be met with the actions of WELS and other enforcements that result in reducing basic life necessities and in developing businesses and materials to meet the countries increasing population. Local manufactures in their efforts to remain in the market need to be allowed to choose what the market needs and to be able to have flexibility to manufacture products to their markets without constant increase to fees, certifications multi-product classification fees and fines and criminal charges. WELS, currently is the only “plumbing approval body” in the world, that I’m aware of, that labels a retailer, Plumber, or seller of plumbing products as criminals should they contravene a WELS act.

What needs are priorities.

Having put forward the above points there are still other, just as important issues that need to be tabled and implemented.

- Disband WELS completely and assimilate it into Water Mark.
- Allow “freedom of choice” to manufactures in having the option of NOT submitting products to WELS certification.
- Water Mark to remain as the ONE body of water product certification with: 1 x manufacture licence fee (\$1000.00), items submitted for approval at one time e.g. whether 1 item or 25 that fee be set at \$100.00 per item, and the licence be a 5 year period. There is no “overseas factory or local factory inspection”, this currently shows other nations manufactures our total disregards and disrespect to their ability in manufacturing. We currently recognise most countries international approval/testing authorities and yet question the factories who submit the product to them!

- Allowing the manufactures to supply product to their customers needs would help smaller local companies compete with larger international companies as the larger companies will not be interested in “small quantity” manufacturing. Some customers will not require water saving properties to their product, whether they are; taps/showers/toilets/ hot water systems etc, as would be the case in abattoirs, boats, low water supply systems, either commercial or private. Some of these “open use water supply” are currently being installed and having all WELS certified standards removed from them as the appliance/fitting does not do its job under the current WELS mandate in that situation. This is evident in areas where the existing sewer drains are earthenware and the drainage “fall level” is not steep enough for the effluent to be carried with less water.
- The end user will make their decision on the product manufactured whether it supplies the water capacity to do the job they require. This “customer product selection” will in the long term help manufactures “specialize in water saving range of products to suite various needs.
- Governments will need to plan replacement or increase water services to older areas for the increase in sewerage pipe work and replacement of old “mains pressure” water pipes’ which will be partially paid from the water used by consumers.
- Government will need to commence increase in water storage and or desalination plants to all areas including regional areas.
- Tax concessions could be offered to industry that recycles its water or reduces its consumption annually.
- All government schools, institutions, hospitals etc to have grey water use applied to all parks/ovals with-in their boundary.
- All road drainage to be piped back into lakes or swamps where possible instead of just ground water pits. This increase in lake catchment could help in bush fire fighting with water bombers when lakes currently have dried up.
- All new housing & commercial subdivisions to have housing stormwater piped to manmade lakes in the area or local council catchment areas.
- When Water Mark becomes the only recognised water product approval centre (by July 1st or 1st December 2013) it will recognise the right of manufactures to supply product to be approved under their application to standards already reached internationally or as requested by the manufacture which would include dual flush 4.5-6.0 litre toilets or single flush 6 litre toilets.

Keith Burbridge

Director

Gro Agencies Pty Ltd

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