

11 April 2013

Parliament House
Canberra
ACT 2600
Australia

Dear Sir / Madam,

RE: Water Efficiency Labelling Scheme review

Please find enclosed the Master Plumbers' Association of Queensland (MPAQ) response to the Water Efficiency Labelling Scheme review.

Master Plumbers protect the health of the community and the environment through professional plumbing services.

MPAQ is the peak industry body representing plumbing contractors throughout Queensland, from sole operators to medium sized plumbing businesses and large contracting firms, who employ the majority of plumbers and gas fitters in Queensland. MPAQ directly represents over 3200 plumbers, drainers, gas fitters statewide.

MPAQ is an Association run by professionals for professionals, ensuring that plumbing businesses remain viable for future generations. As well as being the collective voice for the plumbing industry in Queensland, the Association also offers its members a full range of professional services, from employment and workplace relations to technical assistance and training. These services allow plumbing contractors to establish and maintain successful businesses and plan for the future.

Effective plumbing services are critical for maintaining and enhancing community health as well as protecting the environment. MPAQ recognises its members are at the forefront of this essential service industry and provides professional expertise and support to ensure their ongoing business viability.

Master Plumbers are installers of gas, water reticulation and irrigation systems, fire protection services, heating and cooling, mechanical services/air conditioning systems, sanitary disposal, drainage, metal roofing, wall cladding and other plumbing services.

The MPAQ participates on a number of National Committees and boards including:

- Master Plumbers Australia Ltd
- Plumbing Industry Council
- Construction Skills Queensland



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- Plumbing Industry Consultative Group
- Service Trades Queensland
- Queensland Gas Association

We also have a strong affiliation with other industry bodies including:

- Backflow Prevention Association of Queensland
- Institute of Plumbing Inspectors Queensland
- Association of Hydraulic Services Consultants Australia for the Qld chapter
- National Fire Industry Association of Queensland
- Air-conditioning and Mechanical Services Association of Queensland
- Industry Suppliers & Manufacturers
- Association of Rotational Molders Qld
- Plumbers Union Queensland

Kind regards

Ernie Kretschmer
Technical Services Manager
Master Plumbers Association of Queensland

Master Plumbers' Association of Queensland response to Water Efficiency Labelling Scheme

The objectives the Act are as follows:

- (a) To conserve water supplies by reducing water consumption;
- (b) To provide information for purchasers of water-use and water-saving products;
- (c) To promote the adoption of efficient and effective water-use and water-saving technologies.

Whilst Master Plumbers' Association of Queensland (MPAQ) supports the objectives of the Act in principle, after more than ten years of the Act being in force, the plumbing industry still struggles to understand the intent of this legislation.

The overall objective of WELS is to promote and assist water conservation principles which are strongly supported by plumbing practitioners and the industry at large. The Plumbing Industry is frustrated that outcomes are not being achieved because of the current legislation.

Issues that industry has identified are:

- Relationships between the Water Efficiency Labelling Scheme (WELS) and WaterMark (*note that WaterMark's administration has now been changed and it is now being administered by the Australian Building Codes Board (ABCB). The relationships between the two previous administrators in the past has not been cohesive and effective.
- The relationship and communication between WELS and Australian Standards also is not cohesive and constructive therefore conflicts concerning outcomes are affecting the industry.
- Relationships between the ABCB, the National Construction Codes, particularly the Plumbing Code of Australia is not apparent. Industry anticipates that there may be issues progressing forward with the intended outcomes of the WELS legislation and WaterMark. The recent acquisition of the WaterMark under the functions of ABCB is viewed as a progression towards harmonisation of plumbing regulation requirements in the WaterMark space.
- The lack of WELS general awareness is a concern to the Plumbing Industry and there is an apparent need to rectify this with increased communication.
- E-bay and the likes of internet based search engines are not identifying or capturing the WELS intentions and realising the objectives of the legislation
- The understanding of who is tasked with policing this legislation is not clear or apparent from the plumbers and consumers perspective.



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- Conveying the WELS legislation requirements to consumers is a concern for Plumbing operatives with continued consumer dissatisfaction when product is enabled to be installed by plumbers.
 - Harmonisation concerning all areas of the plumbing industry is required. This will require extensive communication that includes and not limited to: broader education of the public, water service providers, regulators and the plumbing industry.

Industry would like to play a key role in the harmonisation process and assist with bringing all these important issues together. This will enable better outcomes for the Community, the general public and regulators tasked with achieving compliance. Through a harmonisation process and review the intended objectives:

- To conserve water by reducing water consumption;
- To provide information for purchasers of water-use and water-saving products;
- To promote the adoption of efficient and effective water-use and water-saving technologies.

MPAQ believes through industries involvement with the regulators this can be achieved and provide satisfaction to all stakeholders.