

22 August 2011

Manager, MCE Secretariat
Department of Resources, Energy and Tourism
GPO Box 1564
Canberra ACT 2601

Via email: [mailto: MCETMarketReform@ret.gov.au](mailto:MCETMarketReform@ret.gov.au)

Dear Sir/Madam

ENA Submission on the Gas Appliance (Carbon Monoxide) Safety Strategy

The Energy Networks Association (ENA) welcomes the opportunity to provide a submission to the Ministerial Council on Energy (MCE) on the draft Gas Appliance (Carbon Monoxide) Safety Strategy developed by the Gas Technical Regulators Committee (GTRC).

ENA is the peak national body for Australia's energy networks. ENA represents gas distribution and electricity network and transmission businesses on economic, technical and safety regulation and national energy policy issues.

ENA supports the draft Strategy developed by the GTRC including the detailed technical analysis of the causes of elevated concentrations of CO within residences and the merits of the potential controls identified to mitigate the risks. In particular, we concur with the concerns raised in the report with respect to the performance and suitability of CO detectors and agree with the recommendation to engage a suitably qualified consultant to review the report and other relevant literature and conduct a quantitative risk assessment prior to the development of any proposed regulatory changes. As a key industry stakeholder, ENA would be keen to actively participate in this next step.

ENA notes that the draft Strategy focuses on one particular type of household gas appliance; conventionally flued natural draught appliances. We consider that this approach is appropriate given that the risks identified are particular to this type of appliance subject to certain specific installation and operating conditions.

We have the following specific comments on the draft Strategy.

Comments

From a detailed consideration of the analysis included in the draft Strategy, in ENA's view the key issues are as follows.

The most significant issue relates to the use of conventionally flued natural draught appliances in 'air tight' or 5 star and greater energy rated dwellings. As concluded by the GTRC, the move to greater thermal efficiency in buildings and the concurrent growth in the installation of exhaust fans will become a major contributing factor in the development of negative pressures within residential dwellings which in turn can lead to situations where adverse flow of flue products will occur. ENA supports the GTRC's recommendation to conduct a comprehensive risk assessment to quantify the risks and to fully assess the regulatory implications of any potential mitigation measures.

Notwithstanding the above comments relating to high thermally efficient new dwellings, ENA considers that the risk levels associated with the use of conventionally flued natural draught appliances in existing installations are considered to be relatively low but could, however, be mitigated further by some of the measures identified in the draft Strategy such as appliance maintenance and improved public awareness. In terms of appliance servicing, ENA agrees with the recommendation in the draft Strategy that gas appliances should be serviced in accordance with the manufacturer's instructions. Furthermore, in ENA's view there may also be merit in terms of reviewing and improving appliance and installation standards for new conventionally flued natural draught gas appliances that are installed in existing dwellings.

Regarding consumer awareness, ENA supports increased public awareness communication on the importance of regular servicing of gas appliances and the need to use qualified trades people. The industry already uses utility bills to promote these messages and would encourage Governments and technical regulators to contribute funding for further public awareness campaigns. The industry is keen to work with technical regulators in developing and implementing practical and informative public awareness campaigns.

In conclusion, as a key industry stakeholder, ENA is keen to work with the GTRC in the development of the proposed quantitative risk assessment and the further assessment of the implications of potential mitigation measures.

If you have any questions on this paper, please do not hesitate to contact Dale Weber on 02 6272 1515.

Yours sincerely



John Devereaux

Chief Executive