



4 July 2013

Mr John Tansey
Assistant Commissioner
Home Building Service, NSW Fair Trading
Level 4, 1 Fitzwilliam Street
Parramatta NSW 2150

APPROVED FORMS UNDER THE GAS SUPPLY (CONSUMER SAFETY) REGULATION 2012

Dear John,

Thank you for email titled - Approved forms under the Gas Supply (Consumer Safety) Regulation 2012 date 27 June 2013, and the opportunity to provide feedback on the proposal to set a cut off date of 30 September 2013 for the use of paper based certificates of inspection and certificates of compliance forms in NSW.

Gas Energy Australia does not support the seven month window proposed in your email and recommends a window of at least 16 months; this would result in a proposed cut off date of 1 July 2014.

The reason for an extended cut off date is to allow vehicle equipment installers to clear existing paper based stocks of the old form. It is important to recognise that the previous form was not a NSW Government issue form, but one developed with funding provided by individuals and equipment suppliers and approved by WorkCover NSW. There are three factors which support this request;

- a. print runs of the NSW WorkCover approved format were still being purchased/delivered in February 2013 due to uncertainty with the implementation of the new system;
- b. the minimum print order for books and compliance plates was 1,000 units; and
- c. the ability to use this quantity of documents has diminished as the volume of LPG conversions has plummeted to numbers not seen since 2003.

Extending the proposed cut off date to 1 July 2014, will allow the NSW Office of Fair Trading to make changes to the online form and enhance online assistance particularly with Autogas.

The following are suggested improvements to the online form:

- a. Add licensed workshop details - as the details are not included in the online form. This provides a verifiable check that the conversion is being conducted in a licensed/registered business;
- b. Include references to AS4983 - which is the Australian Standard for Forklifts and Industrial Machines, as Forklifts require both compliance plates and compliance/inspection certificates;
- c. Inclusion of a NSW OFT contact phone number on the form for inquiries and assistance; and
- d. Check the relevance and privacy issues of including the home address of the licensee in the section "Licensee's Details".

The following are suggestions for improved online assistance:

- a. Include general advice on how to fill in the form from an Autogas perspective, given the form is a utility type form covering all gas certificates of compliance and certificates of inspection. This would clearly indicate what sections need to be completed; and
- b. In relation to the certifying component of the form, "*In respect of the gasfitting work I certify that, Item 5. I have attached a durable defect notice to the.....*". This is a new addition for Autogas conversions and requires online guidance on; the format the durable defect notice should adopt, where it should be attached, and procedures for dealing with the defect.

Should you have any questions or require further clarification or information please contact, Mr Darryl Ramm, Gas Energy Australia Manager Technical Development, via email at dramm@gasenergyaustralia.asn.au.

In closing, I look forward to your consideration to extend the cut off period for using the paper based forms to at least the 1 July 2014, and to take the opportunity to rectify issues and ambiguities outlined above in the online form and the online assistance.

Thank you for your cooperation on this matter,

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Carmody', with a horizontal line underneath.

Mike Carmody
Director and Chief Executive Officer

Distribution: Gas Energy Australia Automotive Equipment Suppliers Committee