

1 February 2016

**Mr Enzo Alfonsetti**

Manager, Type A Gas Appliance Safety  
EnergySafe Victoria  
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Via email: ealfonsetti@esv.vic.gov.au

**PROPOSED CHANGES TO THE GAS APPLIANCE AND COMPONENT CERTIFICATION**

Dear Mr Alfonsetti

First, thank you on behalf of the members and associates of Gas Energy Australia for the opportunity to provide comments on the review of the proposed Rules for Gas Appliance and Component Certification and the Assessment Criteria for the Recognition of Conformity Assessment Bodies (CAB) currently being undertaken by the Gas Technical Regulators Committee (GTRC).

It is vital to the downstream gaseous fuels industry that gas appliances and components are safe and fit for purpose and that there are no additional barriers or red tape which adds costs to consumers. It is in this context that Gas Energy Australia offers the following recommendations.

- Remove the current requirement for remarking components already marked with trusted international descriptors which would cut red tape that delivers no benefit and remove an unnecessary additional cost for industry and consumers.
- Remove the current requirement for duplicate appliance markings. Both a CAB marking and a Gas Compliance Mark are currently identified in the scheme rules but having both offers no benefit to consumers and may actually confuse them. The Gas Compliance Mark should be mandatory and the CAB marking optional.

GEA in-principle supports "The Rules" but they should be adopted **uniformly** and enforced by **all** States and Territories in a timely and consistent manner. Businesses wishing to develop or import/manufacture gas appliances or components must be confident that the certification process and outcome is uniform no matter which jurisdiction the application is made or intended to be sold in.

Thank you for your consideration. GEA and its members look forward to working collaboratively with the GTRC on this and other issues into the future.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal flourish extending to the right.

John Griffiths  
Chief Executive Officer