Options for addressing risks from open flued gas space heaters in Victoria

Addendum to the Discussion paper
Acknowledgment

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices.

We are committed to genuinely partner, and meaningfully engage, with Victoria’s Traditional Owners and Aboriginal communities to support the protection of Country, the maintenance of spiritual and cultural practices and their broader aspirations in the 21st century and beyond.
Addendum to the discussion paper:

On 4 December 2019, the Department of Environment, Land, Water and Planning (DELWP) published the Discussion paper: options for addressing risks from open flued gas space heaters in Victoria. Following feedback on the proposed options during the current consultation process, an additional core option has been identified which merits further consideration through the current regulatory impact statement (RIS) process.

This additional option is outlined below and will be considered alongside the existing core options outlined in the discussion paper. The following table summarises options currently being considered, including the additional option outlined in this addendum (the additional option is in blue text).

### Core Option

<table>
<thead>
<tr>
<th>Core Option</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1 - Base Case</td>
<td>Under this option the current set of Victorian regulations relevant to OFGSHs and CO poisoning would not be changed. Educational campaigns run by ESV would continue to inform the public of the dangers associated with exposure to CO and encourage servicing.</td>
</tr>
<tr>
<td>Option 2 - Ban on new installations (excluding like for like replacements)</td>
<td>This option would ban the installation of OFGSHs in households where they were not already installed. Installations of OFGSHs would continue to be permitted where they replace an existing OFGSH (a “like for like replacement”).</td>
</tr>
<tr>
<td>Option 3 - Ban on all installations</td>
<td>This option would ban all OFGSH installations in Victoria, both new and like for like replacement installations.</td>
</tr>
<tr>
<td>Option 4 - Standards based approach</td>
<td>In this option, the Victorian Government would submit a project proposal to Standards Australia requesting an amendment to the gas appliance standards AS/NZS 5263.0 and AS/NZS 5263.1.3. The amendment would seek to enhance the safety requirements for OFGSHs.</td>
</tr>
<tr>
<td>Option 5 - Victorian safety requirements (new)</td>
<td>This option would introduce into Victorian regulations new minimum safety requirements that OFGSH models must meet in order to be certified for supply and installation in Victoria.</td>
</tr>
</tbody>
</table>

### Complementary Measure

<table>
<thead>
<tr>
<th>Complementary Measure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 1 - Mandatory installation of CO alarms</td>
<td>This measure would mandate the installation of CO alarms in all buildings where OFGSHs are installed. This could be extended to include any type of gas space heater.</td>
</tr>
<tr>
<td>Measure 2 - Mandatory servicing requirements</td>
<td>This measure would mandate regular servicing of OFGSHs and recommend potential changes to compliance certificate schemes. Importantly, mandatory servicing could be broadened to apply to any gas heater, not just OFGSHs.</td>
</tr>
</tbody>
</table>

### Extended submission timelines

To allow consultation on the proposed additional option, the submission deadline to respond to the discussion paper and the addendum has been extended from 18 December 2019, to midnight 31 January 2020.

Anyone wishing to respond to this document is encouraged to submit a response either online or via email. The questions provided throughout this document and summarised in Appendix A are intended as a guide only. It is not mandatory to respond to every question, nor to comment on all issues discussed in the paper. Additional feedback on other relevant issues or topics is also welcome. It is recommended that evidence and/or examples are provided to support your submission, where possible. Anyone wishing to respond to this document can provide feedback through the Engage Victoria website at wwwengage.vic.gov.au or email gas.safety@delwp.vic.gov.au. All submissions will be treated as public documents and may be referenced in further policy development or public documents such as the RIS, unless the submitter has requested that their submission remain confidential or be de-identified.
Additional option

Core option

Option 5 - Victorian safety requirements

This option would introduce new safety requirements for OFGSHs through Victorian regulations. This would establish modern safety standards for OFGSHs in Victoria, beyond the current Australian Standards which govern the design of OFGSHs for sale in Australia.

The current Australian Standards may no longer be appropriate given they may not adequately account for fundamental changes to improve the energy efficiency of Australian building stock, which are likely to reduce ventilation in buildings and increase the likelihood of negative pressure and the risks from OFGSHs.

Anticipated impacts

Heaters being supplied or installed in Victorian homes, would be required to meet increased safety standards to ensure OFGSHs include features that overcome environmental risks that could make them unsafe (e.g. a pressure switch that disables the appliance if combustion products build up or negative pressure occurs).

Option 5 could introduce safety standards similar to those that could be introduced under Option 4 (via Australian Standards), however the Victorian Government could determine the level of safety required and the timelines to introduce new requirements. This could mean new requirements are introduced more quickly than under Option 4 (as noted under Option 4, it could take up to four years to agree and introduce new Australian Standards). The Standards Australia committee may subsequently or concurrently consider adopting similar requirements nationally.

Over time Option 5 would decrease the overall likelihood of fatal and non-fatal CO exposure in Victoria in all buildings (new and existing), as all new or replacement OFGHs would be required to meet new safety requirements. Similar to Option 4, there may still be some risk of CO exposure from OFGSHs if heaters are not well maintained. However, unlike Option 4, the Victorian Government could determine the level of safety required to overcome the environmental risks (for example, risks from negative pressure).

The expected impact on manufacturers could be similar to Option 4 – and the feasibility of manufacturing OFGSHs may decrease as products are altered to comply with the new standard, leading some manufacturers to cease production and sales of OFGSH. However, impacts may be reduced for manufacturers that can innovate and redesign OFGSHs.

Questions: Victorian safety requirements

a) What do you identify as being the key risks and benefits of this option? Do you think they have been captured in this discussion paper?

b) What information or evidence can you provide that might assist in quantifying these risks and benefits?

c) Would you support this option? Why or why not?

d) Would you support the immediate implementation of improved Victorian standards, if this is deemed the preferred option of the RIS? If not, over what timeframe would you prefer to see improved Victorian standards implemented and why?

e) If this option was the preferred option in the RIS, are there any measures the Victorian Government should consider to support industry transition?

f) Do you have any other comments about this option?

Note: the questions provided throughout this document are intended as a guide only. It is not mandatory to respond to every question, nor to comment on all issues discussed in the paper.