



AUSTRALIAN INDUSTRY

G R O U P

Ai Group Submission

in response to the

Water Efficiency Labelling and Standards (WELS) Scheme Consultation Paper, Department of Sustainability, Environment, Water, Population and Communities, 24 January 2012

March 2012

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RESPONSE TO THE WELS SCHEME CONSULTATION PAPER

Ai Group understands the WELS scheme's objectives as set out in the Water Efficiency Labelling and Standards (WELS) Act 2005 are to:

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

The Independent Review of the WELS Scheme identified several issues that needed to be addressed to improve the scheme's effectiveness, efficiency and viability. These included refining the governance of the scheme, improving the scheme's compliance framework and registration processes, and addressing the scheme's funding shortfall. Ai Group agree that these key areas as well as the development of a three-year strategic plan and budget for the WELS scheme require addressing and improvement.

The Standing Council on Environment and Water agreed at its 30 November 2011 meeting that the fee structure during 2012-15 should recover 80 per cent of the scheme's operating costs from industry participants, with governments contributing the remaining 20 per cent. This fee structure is consistent with the scheme's original cost recovery approval in 2005 to recover 80 per cent of the scheme's costs, however, this fee structure has never been agreed by industry participants in the scheme including Ai Group members. Ai Group would argue that industry pays a much higher percentage of the entire scheme costs than 80% by virtue of the fact that all the work undertaken by industry to be involved in the WELS scheme is counted as zero in the costing of the scheme.

Industry cost to be involved in the scheme is estimated to be more than \$7 Million per year. This can be broken down into tasks per product:

- product design and in-house manufacturer testing (engineering specification to WELS requirements);
- testing (administration and laboratory testing time, checking test reports. A shower test is around \$2000 and mixer around \$1000);
- quality assurance (ongoing production sample in-house testing);
- marketing resources (catalogue and price list information, label printing and application)
- product registration onto the WELS database
- Sales team market surveillance to determine if "run-out" products are still in the market in order to maintain, yet minimise registrations.

The cost of the WELS scheme for a single plumbing product is estimated to be 30 hours work (5 hours submission preparation and 25 hours design, testing etc). The cost of the WELS scheme for a single "whitegoods" product is estimated to be 5 hours (less than plumbing products as much of the design and testing work is already undertaken for energy efficiency requirements). As the WELS database currently contains 14 849 plumbing products and 1312 "whitegoods" products, the total costs to industry in terms of professional hours is $(14849 \times 30) + (1312 \times 5) = 452\,030$ hours over 5 years.

Using a conservative average hourly rate of \$81 per hour for a professional worker (engineer, test laboratory technician, production manager, marketing & sales professional and including business occupancy, remuneration and administration on-costs such as superannuation, leasing office space, IT and administration support, furniture & fit out, insurance, workers compensation, payroll tax, energy costs, training & development etc), Ai Group estimate the total cost of the WELS scheme to industry over 5 years is more than \$36 Million.

Cost recovery

Industry believes that the major beneficiaries of the scheme are the state owned water corporations, saving considerably more than the cost of the WELS Scheme in delivery infrastructure and storage upgrade cost reductions. These state owned assets are a major component of the whole water supply system and should contribute the major share of the government costs of the scheme given that they are saving on considerable expenditure and the scheme imposes only costs on industry (as outlined above). This position has not been proposed as an option by the consultation paper, however this is the primary Ai Group position. Ai Group propose that the revenue to cover the cost of the government participation in the scheme should be borne by the state owned water corporations. Industry is then willing to pay for the costs for industry to be involved in the scheme (as outlined above and which equates to nearly 80% of the entire costs of running the scheme, including both the cost to government and cost to industry).

Ai Group have two distinct groups of members relevant to the WELS Scheme - "Whitegoods" manufacturer/ supplier members supplying clothes washing machines and dishwashers and plumbing industry manufacturer/ supplier members. In some cases these Ai Group member groups have differing views. However, as a secondary Ai Group position on cost recovery, all whitegoods manufacturers and all plumbing industry manufacturers / suppliers agree that the flat fee proposal is the preferred and only viable industry funded option (as long as the overall registrant definition remains as current and individual brands are not required to have a separate registration).

In the additional consultation document, the WELS regulator states that the 'flat fee' arrangement is contrary to cost recovery principles. Ai Group argues strongly that the cost recovery principle is secondary given the main objective of the scheme - to conserve water supplies by reducing water consumption - has not been factored into the costing model. The consultation paper does not outline how much water will be saved or wasted if the revenue varies from the target of \$1.48 Million. Additionally, as industry is being asked to pay 80% of the government cost of the scheme, Ai Group would argue that industry should have the majority say on how funds are collected.

Of the options proposed by the WELS regulator, only the option of a flat fee will encourage manufacturers to maintain and expand their current market offer. This is especially relevant to the plumbing manufacturers and suppliers, as all other options will result in businesses actively reducing their market offer (number of models) in order to reduce the cost burden of the WELS Scheme. Many

lower sales volume models will become unviable under options 2, 3, 4 and the tiered registration fee proposed. If the costs of testing and registering products exceed the profit margin of a model (after allocating overheads), it is likely the product will not continue to be available to the market. By the same reasoning innovative solutions are less likely to be developed. Consumer choice will be considerably reduced and small¹ and medium sized plumbing manufacturer / supply businesses may become unviable.

The plumbing manufacturer and supply industry is characterised by many small to medium sized businesses¹ with low turnover and a relatively large number of models in their catalogue – greater than 200 models. These businesses will be particularly hard hit by any of the options other than the flat fee approach. Additionally, larger businesses can have many brands and are concerned at the possible definitions of a “brand” and the possible requirement to pay a flat fee registration per “brand”. For these reasons, Ai Group asks for the flat fee funding option and for this flat fee to apply only to each business (defined as the current registrant) and not each brand.

Ai Group plumbing industry members would argue that the family of models definition will likely remain unclear and some plumbing manufactures and suppliers will structure their database to ensure they are paying the minimum amount in WELS registration fees. Such a situation will make it very difficult for consumers and the WELS regulator to locate purchased or display products on the WELS database and the effectiveness of the WELS Scheme will be reduced considerably. This scenario will also result in the WELS scheme not hitting their cost recovery target if options 2, 3, 4 or the tiered registration fee are introduced.

¹ABS Cat no. 1321.0 – Small Business in Australia, 2001 defines small businesses as businesses employing less than 20 people and medium business as businesses employing 20 – 199 people.

The flat fee option will provide the following benefits:

- A reduction in the administrative burden – Currently, businesses need to devote time to monitor the retail market and existing registrations to minimise registration numbers but maintain registrations for products still in the market. Under a flat fee approach, product registrations should not expire so long as the annual entity fee has been paid and certification requirements are met. Registrants should be able to indicate that the product is still live in the retail arena. An additional requirement should be a review of registrations annually to remove registrations that have been sold through the supply chain and are no longer active;
- There will be no change to the models currently registered and offered to consumers;
- There will be no change to price lists, catalogues, web sites, retail and wholesale databases etc;
- This approach will encourage manufacturers to offer the same model with varying star ratings. Eg. 3 star rating for domestic use and 6 star rating for commercial use;
- New entrants to the scheme would be joining a viable scheme which encourages them to grow in terms of their product offer to the market.

Options 2, 3, 4 and the tiered fee option discourage growth and expansion into new product lines and encourage suppliers to try to “cheat the system” and stretch the limits of definitions (as currently occurs). These options will also encourage suppliers to register products for shorter rather than longer periods to minimise costs. Grandfathering compliance may then become an administration burden for suppliers as well as the WELS regulator. The tiered registration fee proposal increases the administration requirements of the scheme on businesses (compared to flat fee) and may encourage some suppliers to register less models or shorten their registration life to minimise costs. One Ai Group member has stated that under a tiered fee structure, they will need to reduce their product offer from over 400 models to less than 80 models to remain viable. This Ai Group member is a small business¹.

Ai Group supports the individual administration fee of \$20 - \$25 for each new registration.

From a government perspective, surely a flat fee registration system would simplify the Department administrative requirements, allowing additional resources to be devoted to surveillance and compliance activity?

It is difficult for Ai Group to consider a third cost recovery funding preference as our member views become divergent. As a third preference, “Whitegoods” suppliers prefer option 4, larger plumbing suppliers prefer option 1 and option 6 (tiered) and small and medium plumbing suppliers prefer option 1 and option 2.

¹ABS Cat no. 1321.0 – Small Business in Australia, 2001 defines small businesses as businesses employing less than 20 people and medium business as businesses employing 20 – 199 people.

Database maintenance

Ai Group suggest the WELS regulator consider a scheme similar to the E3 system whereby suppliers are responsible for the maintenance of the data base by identifying discontinued models on an annual basis, this would assist the regulator in achieving their objective of improving the accuracy of the WELS database.

Answers to questions posed in the consultation papers

- *Q: Is the definition of a model as 'what is in the database now as a model' workable for you?*
Ai Group: Yes, although the definition of model will need to be extremely tight and Ai Group is sceptical as to whether such a tight definition is achievable.
- *Q: Do you accept the proposal that further clarity regarding the definition of a model be tasked to the Standards Australia committee WS-032 during the first year of the new arrangements?*
Ai Group: Yes.
- *Q: Do you support a tiered registration fee, where an annual registration fee is charged and linked only to the number of models registered?*
Ai Group: No, as per the comments above.
- *Q: If you support such a fee arrangement, do you support pro-rata crediting of existing fees, and the consequent higher fees that result?*
Ai Group: See comments below.

Question 1 (page 7):

Registrants: What would assist in streamlining registration for your organisation?

Ai Group comment:

1. We would like a brief summary at the start of the registration process, detailing the requirements to complete a registration such as a test report, sample labels and a declaration;
2. The ability to save and store an application for completion at a later date;
3. The capacity to pay by credit card, direct transfer or invoice
4. The ability to upload excel spreadsheets (If so, can the WELS regulator provide a template);
5. The pre-population of common fields;
6. Increased functionality (i.e. copy and paste from previous application to new application)
7. Automatic invoice generation (if this is the preferred option)

Question 2 (page 14):

What is your preferred registration option and why? You may like to estimate the impact of each of the registration options on your business, taking into account the number of models and registrations you are likely to utilise in 2012/13 and the administration costs involved.

Ai Group comment: The primary position of Ai Group is for the state water assets to pay for the cost of running the scheme and for Industry to pay for the product development, testing and business administration of the scheme.

The second choice of all Ai Group members is support for a flat fee structure proposed by Industry at the consultation forums and outlined by the WELS regulator in the additional consultation paper.

The third choice of Ai Group members causes much divergence in membership views. The washing machine and dishwasher appliance suppliers choose option 4 as they say it would be the simplest administrative option and fairest system for all participants. The plumbing supply members are divergent in opinion with larger suppliers choosing option 6 (tiered fee) and small and medium suppliers choosing options 1 and 2 as their third choice.

Question 3 (page 14):

If your preference is for option 3 (product sub-categories), are the proposed sub-categories in Table 4.3 on page 12 appropriate? Can you suggest how the sub-categories can be made more relevant?

X No Comment

Question 4 (page 14):

Do all products that you sell have a unique code? For businesses that do not employ a unique code for their products, does this create difficulties? In your opinion, what is the most effective way to separately identify individual models/variants registered under the WELS scheme?

Ai Group comment: All products have a unique code. Without a unique code for each product, administration and enforcement of the scheme would become difficult. Products without a unique code should pay a higher registration fee as the registration fees should be commensurate with the work involved to administer the scheme.

Question 5 (page 15):

Is there a need for sets of minor products under the new arrangements? Why/why not?

Ai Group overall comment: Under a flat fee approach, a minor product is not needed and all stakeholders will willingly comply. The system requires simplification and not additional definitions, which may enable some stakeholders to try to cheat the system.

Ai Group whitegoods suppliers comment if the flat fee structure is not adopted. Yes there is a need because sometimes suppliers will bring in a small number of sample products for field testing or market evaluation. This provision enables these sample products to be registered.

Ai Group plumbing industry supplier comment if the flat fee structure is not adopted: Yes there is a need to continue minor products because all options need to be covered. Eg custom designed equipment, product segments that are a very small market and would likely disappear without this option and a different star rating for commercial equipment.

Question 6 (page 15):

Do you supply sets of minor products? If so, what percentage of your business do these products constitute?

Ai Group plumbing industry comment: Yes as defined in the consultation paper. Some Ai Group plumbing supplier members report more than 50% of the total number of models may be minor.

Question 7 (page 15):

Are the criteria for sets of minor products appropriate? If no, please provide reasons.

Ai Group plumbing industry comment: The limit of 15 models per application should not apply as some minor models may not sell even one product in a year. Then a small project may require a small production run. Limiting the number will force these products off the market.

Question 8 (page 16):

Do you have a preference for a particular renewal system - fixed (e.g. annual) or flexible (e.g. 1, 2 and 3 years)? Why?

Ai Group comment: Under the flat fee option, the administration burden should be greatly reduced as there would only be a need to renew registration of the business annually.

Under the options where model renewal is required our members would prefer to register the product just the once when it is launched into the market. The average life cycle of that particular product group should be evaluated and that would determine the time for renewal. Therefore a flexible renewal system with an option of five years is preferred. This approach will minimise the administration burden.

To mandatorily reduce the renewal period below 5 years and especially if reduced down to 1 year would be a huge administrative burden on industry and is not preferred.

Also, regarding the type of payment system employed, many companies do not allow company credit cards and so payment by credit card is difficult. An invoice system or account system is preferred.

Question 9 (page 17):

For transitioning to the new fee arrangements, do you prefer that registrations commence from the date of inception of the new scheme, or an option that staggers commencement of new registrations?

Ai Group comment: The flat fee will reduce the administrative burden considerably.

With other options that require product registration, the preferred Ai Group approach is a staggered start approach.

Problems were experienced with the introduction of the new energy label website and as a consequence a staggered commencement of new registrations would be the strongly preferred option. A staggered commencement or transition type period will spread the administrative burden instead of concentrating it at one particular time of year.

If all registration requirements take place at a single point of time it would take the larger companies up to six months to complete the re-registration process and involve the sales, marketing, purchasing, Engineering and Quality Assurance Departments as well as outside test laboratories. It is not practical to concentrate what is effectively 5 years work at the moment, down into months. A single 'date of inception' type approach is definitely not the Ai Group preferred option.

Question 10 (page 18):

Which of the two options for treatment of existing fees at the commencement of the new scheme do you consider the most appropriate and/or administratively straightforward for you? Why?

- a) Existing fees are pro-rata credited and the total amount returned is collected through higher fees, or
- b) Existing fees are not credited to individual registrants, but their retention used to lower fees.

Ai Group members are completely divided in opinion on this question. Many larger Ai Group members prefer option (a). Some Ai Group members would prefer option (b).

Other Ai Group members question the very legality of both options offered by the WELS consultation paper.

Question 11 (page 20):

What is your preference for grandfathering provisions, and why? Should grandfathering be indefinite, with the Minister able to specify a date of 'no further supply', or should there be a specified period of grandfathering after the WELS standard is changed?

Ai Group whitegoods supplier comment: We would argue that the Minister should have the power to specify a date of "no further supply" only for safety concerns or where there is credible evidence that stockpiling of products is occurring. However we believe that the proposed changes to the scheme are not focused to achieve the maximum outcome. For the electrical safety scheme proposed by ERAC, the focus is at the top of the supply chain because over decades of experience ERAC have concluded that the lower parts of the supply chain are so diverse that it is extremely difficult to effectively enforce the regulations. The top of the supply chain is the manufacturer in Australia or the first entity to import the product into Australia. This entity registers with ERAC as a "Responsible Supplier" and is responsible for the registration of the particular product they wish to import or manufacture.

If a similar system was to be adopted by the WELS regulator, the grandfather provisions should apply to the "responsible supplier". Once the "responsible supplier" has sold the goods on to the next party in the supply chain, a retailer like Harvey Norman or Tradelink, then the goods can be sold out indefinitely by these entities further down the supply chain. Ai Group whitegoods supplier members STRONGLY preferred position is that a product should be indefinitely grandfathered after supply by the responsible supplier. Data provided by one of our members, who is a major appliance supplier, indicates that more than 98% of WELS appliances sold by the responsible supplier are less than 12 months old and 99.8% are less than 24 months old. While some stock will remain in the retail supply chain, it is clear that it is not cost effective to impose regulations beyond supply by the "responsible supplier". Suppliers of WELS appliances are in such a competitive market that stockpiling does not deliberately occur. It is unreasonable and uneconomic to require continued registration of products which are in extremely small quantities in the retail environment.

Ai Group plumbing industry comment: Grandfathering should be indefinite. Anything less increases the administration burden for both industry and the regulator. Set grandfather periods create problems for slow moving stock and reduce the likelihood that retailers will buy in bulk (with the perverse outcome that stock is shipped in a greater number of smaller orders increasing the cost to industry and the cost to the environment). Also, set Grandfather periods are more likely to result in product being returned from wholesalers and retailers just before or after the end of the grandfather period. Manufacturers and importers cannot control the sell out of stock at the wholesale and retail level yet they will suffer when product is returned after sitting on retail shelves for years.

Question 12 (page 20):

Should flow controllers be removed from the WELS scheme or should registration of these products become mandatory? Please provide reasons for your answer.

Ai Group plumbing industry comment: If sold separately they should be captured by the WELS scheme and registered. Flow controllers are the basis of water flow rating.

Question 13 (page 22):

Is there anything else you would like to see for WELS compliance (e.g. new penalties or offences and different compliance responses)?

Ai Group comment: The current lack of prosecutions is a concern. Ai Group members strongly support more appropriate, flexible and proportionate responses to breaches of the WELS Act. The WELS compliance team should focus on major breaches, intentional non-conformance, misuse of the label and abuse of the scheme. Successful prosecutions can then act as a deterrent.

Actual testing of whitegoods should be minimal as water rating testing should be combined with energy label screen testing to improve efficiencies. Also feedback on achievements in enforcement should be made public.

Question 14 (page 22):

What do you think of the current level and focus of WELS compliance activities?

Ai Group comment: Our members are unaware of the current level and focus of the compliance activities.

Question 15 (page 23):

Do you agree with the requirement that all advertising for WELS products must have WELS information? If yes, why?

Ai Group comment: Our members are divided on this issue. However there is some consensus that consumers should be reliably informed so that they can make an informed purchasing decision taking into consideration the water efficiency of the product. If this requirement was enforced in a sensible manner in areas where the supplier had direct control then there would be more agreement on this requirement. However, in a lot of cases the advertising material is not the responsibility of suppliers and so suppliers do not want to pay for the mistakes of third parties. It is the action of the third parties who refuse to monitor their advertising material that cause the suppliers most concern.

Question 16 (page 23):

Is there another way to monitor the advertising requirement? If yes, how?

Ai Group comment: If introduced, perhaps contract to a monitoring service to do this work rather than taking up the time of the compliance team. Also, encourage reporting.

Question 17 (page 24):

How do you access registration information about products (e.g. through the Gazette, through the public database or otherwise)?

Ai Group comment: The public database.

Question 18 (page 24):

Where would you like to access registration information about products? Why?

Ai Group comment: Through the public database. This is a universally accepted and well understood way of accessing information.

Question 19 (page 25):

Do you support the ability of WELS inspectors to enter premises without paying a fee if there is one?

Ai Group comment: If you are referring to entry to trade shows and similar events then we feel that it is reasonable for the WELS inspector to pay the entry fee. If the premises is a general business, then the WELS inspector should be able to enter without paying a fee.

Question 20 (page 25):

Do you support more extended holding of evidentiary material? Why or why not?

Ai Group whitegoods supplier members' comment: Yes.

Ai Group plumbing industry comment: No, the current arrangements should be adequate.

Question 21 (page 26):

How much detail of alleged breaches do you think should be publicised?

Ai Group whitegoods suppliers' comment: The alleged breach, the date of the alleged breach and the name of the company involved. However we would expect the result of the investigation to be public in a short period of time rather than just leaving the alleged breach up on a public website.

Ai Group plumbing industry members' comment: As per other areas of law and reporting, publicise convictions.

Minor offences should be dealt with directly with the offender.

Question 22 (page 27):

Do you support follow-up check testing being at the cost of the registrant of the 'failed' product? Why or why not?

Ai Group whitegoods suppliers' comment: Yes. This would encourage suppliers to ensure products comply with the original check testing.

Ai Group plumbing industry members comment: If the product fails check testing then the registrant should have to pay. If the product passes follow-up check testing then the WELS regulator should have to pay. This will help to make sure the first tests are conducted properly.

Repeat offenders should require additional compliance information (independent test reports for a set period after continued breaches of the Act).

All tests must be performed in an approved NATA testing facility. Non compliant product must be withdrawn from the market.

Question 23 (page 27):

Do you have any concerns about any 'person' being able to apply for registration of a WELS product provided they can supply required test results, WaterMark certification etc? If yes, please outline your concerns.

Ai Group whitegoods suppliers comment: Yes, only the importer or manufacturer should register the product as "The Responsible Supplier" (for further information on "responsible supplier" please see the Ai Group answer to question 11). Other segments of the supply chain will often not have the technical expertise to assess a product and its components or the suitability of the test report supplied. They certainly would not have the ability to monitor and control the performance and quality of the product.

Ai Group plumbing industry suppliers comment: Generally no concerns, however, restrictions should apply to previous major offenders who have had their WELS registrations revoked. Also, test reports need to be authentic.

Question 24 (page 27):

Do you think the WELS Regulator should have any specific functions? Why or why not?

Ai Group plumbing industry members comment: The points listed in 6.2.2 of the consultation paper outline the functions of the WELS regulator.

Question 25 (page 28):

Do you have any concerns about information sharing between WELS and other government agencies? If yes, please provide details.

Ai Group comment: Yes we have concerns about information sharing between WELS and other government agencies. This information can be commercially sensitive. Once released from WELS it is not practical to control the subsequent release to other parties. Previous experience with the energy regulator has resulted in a clause being inserted in some of the relevant Australian Standards on this matter.

Question 26 (page 28):

Does the definition of 'supply' also need to cover any other aspects? If yes, please provide details?

Ai Group comment: The concern for Ai Group members is the move to internet sales and the need to capture this method of "supply" in the legislation. The definition of "Sell" from the NSW Electricity (Consumer) Safety Act contains the following definition:

"sell" includes:

- (a) auction or exchange, and
- (b) offer, agree or attempt to sell, and
- (c) advertise, expose, send, forward or deliver for sale, and
- (d) cause or permit to be sold or offered for sale, and
- (e) hire or cause to be hired, and
- (f) display for sale or hire.

Also, it should be very clear that "Commercial use" is captured in the legislation. The GEMS legislation is attempting to capture this so it would be worthwhile corresponding with the DCCEE legislative drafters on this point. Commercial use would include direct import and use by a commercial entity of WELS regulated products.

Question 27 (page 28):

Have you experienced any issues with the current definition of 'supply'? If yes, in what instances.

Ai Group whitegoods suppliers' comment: Our experience has been with both electrical safety and energy label legislation. As previously stated, the ERAC proposal to capture the first person to import or manufacture the product as being the "responsible supplier" is a good solution that should be easier to administer and to enforce.

Question 28 (page 29):

Do you consider that WELS should be more closely aligned with WaterMark and/or the E3 energy rating scheme? Please provide justifications for your response.

Ai Group whitegoods suppliers' comment: The scheme should be more closely aligned with the E3 energy rating scheme. The reasons were well articulated in the Guest review and this recommendation should be progressed as early as possible.

Ai Group plumbing industry members comment: WELS should become a part of the WaterMark certification as this should reduce the administration burden on businesses.

Question 29 (page 29):

Should the scheme be eventually split between plumbing and whitegoods products and if so, in what timeframe?

Ai Group comment: The scheme should be split between whitegoods and plumbing products and this change should be initiated as soon as possible.

Question 30 (page 29):

Do you see value in a single 'sustainability' label? Why? Who would derive the most benefit from such a label?

Ai Group whitegoods suppliers' comment: There is a global push for a single "sustainability" label. This is an extremely complex concept and there is a real concern that the label may be manipulated to show products as being more sustainable than they are in reality. This would detract from the appeal of such a label as being beneficial to consumers and retailers. We would prefer to keep a watch on the overseas experience and if a viable scheme emerges then Australia could consider the adoption of a proven scheme.

Ai Group plumbing industry suppliers' comment: No, consumers understand the current scheme so leave it as is.

Question 31 (page 30):

Please provide any other comments or suggestions that you would like to make about improving the WELS scheme.

Consider the inclusion of 4, 5 and 6 star provisions for showers based on comfort test approval.

ABOUT Ai GROUP

The Australian Industry Group (Ai Group) is a leading industry association in Australia. Ai Group member businesses employ around 750,000 staff in an expanding range of industry sectors including: manufacturing; engineering; construction; automotive; food; transport; information technology; telecommunications; call centres; labour hire; printing; defence; mining equipment and supplies; airlines; and other related service industries.

In response to the *WELS Consultation paper*, Ai Group conducted industry consultations with members of our Electrical Appliances and Accessories Forum and plumbing industry manufacturer and supplier members.

Electrical Appliances and Accessories Forum

Electrical Appliances & Accessories (EA&A) Forum addresses the technical and regulatory environment affecting supply of electrical appliances and electrical accessories through interaction with regulators and participation in standards bodies. This Forum is particularly focused on electrical safety, energy efficiency and environmental issues associated with appliances including the WELS scheme.

Ai Group Plumbing Industry supplier members

Ai Group plumbing industry supplier members are small, medium and large businesses supplying taps, urinals, lavatories, showers and flow controllers that are captured by the WELS scheme.