

12<sup>th</sup> July, 2013

The Secretary  
Council of Australian Governments Standing Council on Environment and Water (Council)  
Canberra ACT

Dear Sir/Madam

As a member of the Australian Home Heating Association (AHHA), and as the Australian distributor of Lopi Slow Combustion Wood Heaters for 23 years, which are manufactured in the USA, I wish make comment on the proposed Regularity Impact Statement (RIS).

I've been a member of the AHHA for approximately 20years and have been on the Board for most of this time. During this period I have attended many meetings with various levels of Governments to discuss industry issues in the interests of the Environment.

When the Australian Standard 4013 was first introduced the Emission level was set at 5.5g/kg, with no efficiency. Through an Industry initiative this level was brought down to the current level of 4.0g/kg, this was done at great expense to the industry, but was done in the interest of a better environment.

A number of years ago the AHHA were asked to make a submission in regard to the RIS and from that time to now there has been a lot of uncertainty as to what, if any, changes would/could be made to the current emission level, and what efficiency might be introduced (just to nominate a few points).

Because of this uncertainty, again through an industry initiative, a proposal has been put forward to lower the emissions to 2.5g/kg and 55% efficiency and to a lower level by 2019, in line with option 9 of the RIS. This of course would be at an enormous costs to the Manufacturers and Industry, but to the benefit of the environment, as stated in the AHHA submission, and as a Distributor of Slow Combustion Wood Heaters we (Dragon Wholesaling Pty Ltd) do fully support this initiative.

We also believe that, as in most industries, there should be a Certification process to insure that the Heaters are continually built to the specifications of the approved Heater, and the present Certification process that is now in place through the AHHA is an excellent model and is accepted by the various Governments, but not officially, which I might add is disappointing. We do support the AHHA certification process and believe it should continue including the proposal that it be subject to an audit from the JAS-ANZ. We find it very frustrating that as there is no official recognition of the currant Certification process from the Governments and now there is, as a consequence, the situation where we have Heaters that are been brought into the Country and possibly manufactured in Australia, that are neither tested to the AS4013 or Certified, and when the AHHA makes the relevant Government Departments aware of these instances there is no support from the jurisdictions.

As a consequence of the situation with the delay of the RIS, the non-recognition of the AHHA certification process and the lack of support of the jurisdictions in regard to the sale of non-tested and non-compliant Heaters, we now have a situation where local Governments are bringing in their own emission level and Standards, which will create a total unworkable situation. There is no way that Manufacturers can produce their Heaters to meet individual local Governments requirements and stay viable, particularly when there is an Australian Standard, AS4013, which has a 4.0g/kg level.

There are many discussions had as to the pros and cons of Wood Heating, but the facts are that Wood Heating is a very viable source of heating and is it gives the people the right to keep warm during the winter months at an affordable price.

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To this end we support the AHHA in its submissions to the Government's RIS.

Thank you for the opportunity to make the above submission.

Yours faithfully

A handwritten signature in black ink, appearing to read "K I Millhouse", with a horizontal line underneath.

K I Millhouse  
Director – Dragon Wholesaling