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## **ABOUT SPASA**

This submission is made by the Swimming Pool & Spa Association of Australia (SPASA).

SPASA represents the largest body of swimming pool and spa industry professionals across the nation.

Our charter is not only to advocate and respond on issues of importance to our industry, but also proactively create and execute strategies to enhance the credibility and longevity of our members and the broader community.

Members of SPASA Australia include pool builders, service technicians, retailers, manufacturers, suppliers, operators, subcontractors, installers, consultants, and other allied trades, all of whom set themselves apart from the rest of the industry by setting standards of skill, workmanship and ethical business behaviour in the best interests of pool and spa owners.

As the peak industry body, we also develop and advocate policy on behalf of members to further advance the swimming pool and spa industry.

The association operates in every State and Territory in Australia providing a wide range of advocacy, business, technical support, and compliance advice.

SPASA Australia, through its Training Division, the Institute of Research and Learning (IRLearning) is also the only Registered Training Organisation (RTO) nationwide dedicated entirely to the swimming pool and spa and broader industry.

## **SUBMISSION**

SPASA is frustrated with the way the consultation process for the PDRS has been managed, and our response has been compiled and submitted under significant time pressures.

## Activity Definition SYS2

### Name of Activity

#### REPLACE AN EXISTING POOL PUMP WITH A HIGH EFFICIENCY POOL PUMP

### Eligibility Requirements

1. There must be an existing pool pump installed at the Site at time of replacement

### Equipment Requirements

1. The new End-User Equipment must be a product for use with a domestic pool or spa that is a single-phase motor and any of the following types: single speed, dual speed, multiple speed or variable speed pump unit. The pump unit must have an input power of not less than 100W and not more than 2500W when tested in accordance with AS 5102.1. 2.
2. The new End-User Equipment must be listed as part of a labelling scheme determined in accordance with the Equipment Energy Efficiency (E3) Committee's Voluntary Energy Rating Labelling Program for Swimming Pool Pump-units: Rules for Participation, April 2010, and achieve a minimum 4.5-star rating when determined in accordance with AS 5102.2. 3.
3. The new End-User Equipment must have a warranty of at least 3 years.

### **LABELLING**

The Greenhouse and energy Minimum Standards (Swimming Pool Pumps-Units Determination 2021) covers single phase pumps capable of > 120 litres per minute, and with the specified with the below input power:

- Single Speed pumps: 600W – 1700W
- Multi-Speed Pumps 600W – 3450W

A 100W pump could only be achieved by a variable speed pump and in many cases, a saltwater chlorinator would not be able to operate effectively due to low water flow as the cell housing would not prime at this low water flow.

Consequently, this would affect other ancillary pool equipment such as solar heating, gas and heat pumps. 100W is not a realistic benchmark.

### **Recommendation**

Revert to input power ranges as prescribed in the Greenhouse and energy Minimum Standards (Swimming Pool Pumps-Units Determination 2021) and the COAG accepted recommendations.

## WARRANTY

The requirement to have a warranty of at least 3 years is problematic as there are many pumps that comply with the upcoming MEPS regulations (energy-efficient pumps) however, these have a warranty of 2 years due to their price point.

This targeted price category of energy-efficient pumps helps the End-User to proactively move away from low efficiency, non-regulated pumps to a Star rated energy efficient pump.

## Recommendation

Revise the End-User Warranty from 3 years to 2 years to influence consumer behaviour and increase uptake of more affordable Star rated energy efficient pool pumps much faster than if they were restricted to just choosing more expensive options.

## Implementation Requirements

1. The pool pump must be installed by a Licensed plumber and/or electrician, where required by relevant legislation.
2. The decommissioned pool pump must be removed in accordance with relevant safety standards and legislation.

## ELECTRICIAN NOT REQUIRED

Whilst the installation of electrical power outlets **DO** require a licensed electrician, the installation of Pool Pumps **DOES NOT** need to be installed by a licensed electrician.

As per the Eligibility Requirements, there must be an existing pool pump installed at the site at time of replacement.

Accordingly, pool pumps can simply be plugged into any existing compliant electrical outlet or a pool controller with the manufacturer-supplied power lead from the pump unit.

## PLUMBER NOT REQUIRED

The installation of a pool pump as part of a pool and spa water recirculation systems **DOES NOT** need to be installed by a licensed plumber.

A Pool and Spa Water Recirculation System operates as a “closed system” and is not in any way connected to any potable water source.

Pool and Spa Water Recirculation Systems have to do with requirements for skimmer boxes and other permanent water outlets within swimming pools and spas as prescribed under Australian Standard AS1926.3.

AS1926.3 makes no reference to AS3500 (the plumbing standard) and vice versa, as nothing about a pool or spa water recirculation system that is connected to a potable water source.

Accordingly, the swimming pool and spa industry in Australia **DOES NOT** use plumbers for water recirculation installation and /or repairs on swimming pools and spas.

## LICENCE CLASS CATEGORIES

### Swimming Pool and Spa Builder

For NSW Fair Trading licensing purposes, the class of **swimming pool building** refers to all work involved in the construction, renovation, alteration, repair, extension, maintenance, decorative or protective treatment of a swimming pool.

It includes all other works directly associated with a swimming pool installation such as landscaping, safety fencing, pool water filtration and heating.

Note: Pool Water Filtration directly relates to AS1926.3 which includes equipment installation, pool pumps, filters and skimmers. Also, this license class also includes all work referred to in the class of swimming pool repairs and servicing.

### Swimming Pool Repairs and Servicing

For NSW Fair Trading licensing purposes, **swimming pool repairs and servicing** covers work involved in servicing and repair of elements of an existing swimming pool, including internally reticulated pool plumbing *not connected* to a potable water source, solar thermal heating systems that are not hard-wired (excluding any solar photovoltaic (PV) systems), and equipment installation (including filters and skimmers).

It also includes any additions, alterations and repairs of a non-structural nature, the painting or surfacing (rendering or application of surface coatings) to a swimming pool, acid washing and pool cleaning. Similar licensing arrangements are present in other jurisdictions.

Note: Pool Water Filtration directly relates to AS1926.3 which includes equipment installation, pool pumps, filters and skimmers.

### Plumbing, Draining or Gasfitting

Plumbing has to do with the installation of hot and cold-water supply, sanitary plumbing and drainage and stormwater drainage, for domestic and commercial plumbing work.

*Swimming pools and spa water recirculation systems have nothing to do with general housing plumbing. Similar licensing arrangements are present in other jurisdictions.*

Plumbers work under Australian Standard AS3500 and are not trained and have no experience in swimming pool and spa “closed system” installations as prescribed under AS1926.3.

The only reference in AS3500 that has to do with swimming pools has to do with the *discharge of swimming pool water*, which again is not connected to plumbing

Accordingly, unless specifically trained, plumbers do not work in the swimming pool and spa industry.

### Recommendations

Pool Builders and Pool Service Technicians should continue to install pool pumps and pool water recirculation systems in the same way as they have done for many decades without the need for electrician and plumbers.

## LACK OF CONSULTATION

The Consultation around the Peak Demand Reduction Scheme (PDRS) does not appear to have been widely circulated at all, and SPASA, as the peak body for the swimming pool industry was not included in any of the important PDRS discussions, meetings and webinars.

This despite SPASA having direct input into the Swimming Pool Pumps-Units Determination 2021, relevant Australian Standards, Department of Industry (GEMS Registration) and Department of Industry, Science, Energy and Resources (NATHERS).

Had appropriate consultation taken place by the government appointed consultants, Planning and Energy NSW would have been better informed regarding the proposed PDRS impacts to industry and other stakeholders. *Inclusive and targeted consultation is at the heart of any regulatory reform.*

Effective consultation of all affected parties helps to improve the quality of policy outcomes by ensuring that regulation is well informed, technically viable, will work and not inadvertently or adversely affect specific industries and stakeholders.

If consultation is undertaken correctly, and with the correct people, Association's, and Peak Bodies, then consultation should lead to better outcomes.

Accordingly, SPASA strongly recommends that Planning and Energy NSW consults with the *SPASA Pump Advisory Group* prior to any proposed legislation change being considered and adopted.

## FOR MORE INFORMATION

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