

Kerin Turner
Acting Director
Regulation and Policy
Consumer Affairs Victoria
GPO Box 123
Melbourne VIC 3001

Fitzroy Office
55 Johnston Street
Fitzroy 3065
Admin 9411 1444
Advice 9416 2577
Fax 9416 0513
www.tuv.org.au

Dear Mr Turner

Proposed Residential Tenancies Amendment (Prescribed Rating for Replacement Water Appliances) Regulations 2014

The Tenants Union of Victoria (TUV) welcomes the opportunity to comment on the proposed Residential Tenancies Amendment (Prescribed Rating for Replacement Water Appliances) Regulations 2014. The TUV's mission is to inform and educate tenants and residents about their rights, and improving the conditions in which they live.

The intention to prescribe standards for replacement water appliances, fixtures or fittings is welcomed. However, it is the view of the TUV that the proposed standards do not necessarily represent an adequate efficiency baseline for two reasons:

1. The proposed three stars (out of six) standard is not particularly efficient and is at best a bare pass.
2. The legislation allows for sub-standard replacements with a one or two star rating to be installed if water pressure is not sufficient for a three star rated appliance, fixture or fitting. The TUV's position is that the landlord should fix old or dysfunctional plumbing.

Further, the movement towards more efficient hot water systems can also reduce the water flow rate significantly. The associated cost and water savings associated with such systems are likely to be significant; however, the implications for household functionality must be considered.

For further information or comment please contact Liam Cooper, Research Worker (03) 9411 1407 or lcooper@tuv.org.au

Yours Sincerely



James Bennett
Policy & Liaison Officer
11 June 2014