



SUBMISSION TO:

**Department of the Environment and Energy
on the
Consultation Regulation Impact Statement
Swimming Pool Pumps**

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Pool Pumps Team
Appliance Energy Efficiency Branch
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

Email: poolpumps@environment.gov.au

INTRODUCTION

The Swimming Pool and Spa Association of Australia (SPASA) is a National Not-For-Profit organisation representing hundreds of Australian businesses in the swimming pool and spa industry.

Members of SPASA include pool builders, manufacturers, suppliers, retailers, technical servicemen, subcontractors, installers, consultants and other allied trades.

SPASA is also a Registered Training Organisation (RTO) that provides training and assessment to the swimming pool and spa industry. Our courses are designed in consultation with key industry stakeholders and our qualifications and accreditations are highly valued by government, employers and the wider community.

BACKGROUND

Since April 2010, Australian and New Zealand energy efficiency regulatory agencies have been offering the a Voluntary Energy Rating Labelling Program in relation to swimming pool pump-units under the Equipment Energy Efficiency Program (E3).

The Voluntary Energy Rating Labelling Program allowed energy efficiency labelling in accordance with the Australian Standard AS 5102-2009, Performance of household electrical appliances - Swimming pool pump-units:

Part 1: Energy consumption and performance

Part 2: Energy labelling and minimum energy performance standard requirements

At this stage it has not been mandatory to comply or to label swimming pool pump-units, however, a number of manufacturers have chosen to label their pump-units in accordance with the Energy Rating Labelling Program. These companies can then display the energy rating label with the appropriate star rating as prescribed under the minimum energy performance levels.

Whilst the commencement of the Voluntary Energy Rating Labelling Program was an initiative the industry strongly supported it should be noted that pool pump energy performance levels were already being improved through innovation well before AS5102 was developed and since that time we have seen the number of companies manufacturing star rated pool pumps increase significantly.

At the time of writing this submission there was fifty two pumps listed by 15 swimming pool and spa manufacturers participating in the voluntary program.

In response to your invitation, SPASA has consulted with members and requests that Department of the Environment and Energy (DEE) give consideration to the following submission:

1. Do you support the proposal to introduce mandatory energy labelling of pool pumps?

SPASA Australia supports the introduction of Mandatory Energy Labelling of pool pumps subject to the following:

- a) A transition period of not less than 12 months should be permitted for introducing Mandatory Energy Labelling to allow the swimming pool and spa industry sufficient time to adapt and adjust, sell down existing stock, development of manufacturer literature and product training.
- b) Exclude pumps not designed for domestic pool filtration, including solar pumps, pumps designed for swim jets, in floor cleaning systems etc.
- c) Swimming Pool and Spa Industry participation on all relevant Working Groups charged with establishing Mandatory Energy Labelling of pool pumps.

2. Do you support the introduction of a Minimum Energy Performance Standards (MEPS) level for pool pumps?

MEPS – A Staged Approach

SPASA supports a review of Minimum Energy Performance Standards (MEPS) for pool pumps 24 months after Mandatory Energy Labelling of pool pumps is made mandatory.

A staged approach would allow both SPASA and DEE time to carefully analyse and drill down on the data prior to deciding on the appropriate way forward for the swimming pool and spa industry.

Proceeding with MEPS *(without a staged approach)*

Should DEE choose to proceed with MEPS then SPASA would support the following:

- a) **Low Level MEPS** option as set out under 5.6 of the CRIS.
- b) Exclude pumps not designed for domestic pool filtration, including solar pumps, pumps designed for swim jets, in floor cleaning systems etc.
- c) A transition period of not less than 12 months be permitted for introducing MEPS to allow the swimming pool and spa industry sufficient time to adapt and adjust, sell down existing stock, development of manufacturer literature and product training.
- d) Recognition and introduction of curve G as larger pool pumps are unfairly treated and represented by the D curve resulting in an extremely low star rating.
- e) Swimming Pool and Spa Industry participation on all relevant Working Groups charged with establishing and testing of MEPS.

3. Do you have views on the scope of new labelling and MEPS requirements in terms of the types or size of pool pumps that should be covered (wattage, types of pump, application of pump)?

SPASA submits that the scope of new Labelling and MEPS requirements should include all domestic style filtration pumps ranging from 0.5HP - 3.0HP or alternatively be changed to input power of less than 1500W as there are very few domestic pools that will be equipped with filtration pool pumps larger than 1500W.

4. What opportunities or difficulties could mandatory labelling or MEPS for pool pumps create for your company?

Consultation with industry has identified the following:

Opportunities

- a) Mandatory Energy Labelling will provide a minimum benchmark program allowing companies and consumers the ability to measure and compare performance.
- b) The introduction of mandatory display of “noise levels” will also allow quantitative rather than subjective comparisons.
- c) A standard measurement and testing set of parameters to provide clear comparison data for industry and consumers

Difficulties

- a) Mandatory Energy Labelling may lead consumers to question the size of the pool pump and seek alternatives, such as variable speed pumps.
- b) As stated elsewhere, industry to be provided with sufficient transitions periods.
- c) Increased costs of implementation and ongoing compliance to manufacturers and passed onto industry.

General

- a) Improved industry and consumer information be made available to avoid information fail.
- b) Any industry cost recovery arrangements and/or other associated costs be kept at an minimum.

5. Do you have view on when any new requirements should be introduced or what transition arrangements or steps should be considered in introducing new regulations?

As also stated elsewhere, SPASA AU supports:

Mandatory Energy Labelling

A transition period of not less than 12 months for introducing Mandatory Energy Labelling to allow the swimming pool and spa industry sufficient time to adapt and adjust, sell down existing stock, development of manufacturer literature and product training.

Minimum Energy Performance Standards

Minimum Energy Performance Standards (MEPS) for pool pumps be reviewed 24 months after Mandatory Energy Labelling of pool pumps has commenced.

A staged approach would allow both SPASA and DEE to carefully analyse and drill down on the data prior to deciding the appropriate way forward for the swimming pool and spa industry.

6. Do you agree with the data and assumptions made in this RIS?:

SPASA broadly agrees with the data and assumptions made within the CRIS.

SPASA agrees with the potential expansion across the “pool system” rather than just the pump. Acknowledging the difficulty on measurement across the increased variables to this holistic approach

7. Can you think of any other measures that would help to overcome/assist:

SPASA strongly encourages DEE to reach out to the original Standards Australia AS5102.1 and 2 Committee Members for the following reasons:

- a) Committee members have already been selected by their then nominating organisations as experts in their field.
- b) Committee has already researched and undertaken a huge amount of work with pool pumps. Eg: Scope and system curve around MEPS.

- c) Committee could come together, review and consider technical data and proposed changes very quickly.

8. Do you foresee any implications of New Zealand opting out of the regulation of pool pumps?

SPASA envisages that Australian companies would also offer energy star rating labelled pumps under the Mandatory Energy Labelling program to the New Zealand market as it would be unviable to do otherwise.

9. What pumps should be excluded form Mandatory labelling and MEPS?

As also stated elsewhere, SPASA would like to see the exclusion of pumps not designed for domestic pool filtration, including solar pumps, pumps designed for swim jets, in floor cleaning systems etc.

10. Are there any market competition cost implications that you foresee?

The introduction of Mandatory Energy Labelling and Minimum Energy Performance Standards will have significant but important implications for the Australian swimming pool and spa market.

Whilst there are already a number of larger companies supplying the market and a range of pumps that are already participating in the Voluntary Energy Rating Labelling Program there are many smaller or medium sized firms who do not and may withdraw from supplying the market because of their inability to meet any new Mandatory Labelling and/or MEPS level requirements.

As also stated elsewhere, SPASA AU supports transition periods of not less than 12 months for introducing Mandatory Energy Labelling and proposes that Minimum Energy Performance Standards (MEPS) for pool pumps be staged and reviewed 24 months after Mandatory Energy Labelling of pool pumps is made mandatory.

Finally, as a small industry sector, any cost recovery arrangements should be kept to an absolute minimum.

11. Current and proposed energy rating label used under the Voluntary Energy Rating Labelling Program (VERLP).

It is anticipated that for pool pumps, a printed label under a Mandatory Labelling Program would be required to be affixed to every pump before sale and the label would be required to be used in online product information.

SPASA has formed the view that we should continue to use the current energy rating labels and DEE should invest in better promoting the benefits of this label format as it is already developed and a known consumer visual comparison tool.

For further information:

Lindsay McGrath

Chief Executive Officer

Swimming Pool and Spa Association of Australia

Ph: (08) 8364 4211

Email: lindsay@spasa.com.au

Web: www.spasa.com.au