



**RESPONSE TO
DISCUSSION PAPER -
OPTIONS FOR
ADDRESSING RISKS
FROM OPEN FLUE GAS
HEATERS IN VICTORIA**

**VICTORIAN PUBLIC
TENANTS
ASSOCIATION**

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About Us

The Victorian Public Tenants' Association (VPTA) is the voice of public housing in Victoria.

As the peak body representing existing public housing tenants and those on the waitlist, our goal is to provide advice to tenants, and to improve and expand the public housing system in Victoria. Although not formally part of our role, we also assist community housing tenants where possible.

We undertake systemic advocacy and provide policy advice to the Department, undertake community engagement work and operate a free and confidential telephone advice service.

In the 2018-19 financial year, we processed more than 8,000 calls through our free advice line.

Options

We welcome the opportunity to provide comments on the Discussion Paper regarding options for addressing risks from open flued gas space heaters (OFGSHs) in Victoria.

We believe that OFGSH should be phased out, at an appropriate timeline to ensure businesses and workforces are able to transform to minimise the risk of job losses.

The lack of information about the prevalence of Carbon Monoxide poisoning or of OFGSHs and their operating and service history means that it is not possible to get a clear picture of how widespread the risk of illness or death is. However, the inability to effectively protect against the risk of Carbon Monoxide poisoning as a result of the operation of OFGSHs is too great for no action to be taken.

We note that, as the community becomes more aware of the benefits of draught sealing and weather proofing properties, the risk of illness or death as a result of the operation of an OFGSH increases, and this situation is unlikely to be reversed.

Base Case – Option One

We support the recommendation of the Victorian Coroner that OFGSHs be phased out.

Due to ongoing, and increasing environmental risk factors, we do not consider that the risk to community can be addressed by continuing with the status quo.

Although the Energy Safe Victoria campaigns have been effective in increasing community awareness about the risks associated with gas heaters, this has not resulted in many people taking action to address these risks.

While the gas safety checks that are being introduced through Victoria's rental reforms are useful, these should not be relied upon to mitigate the risk of OFGSHs.

This is because a gas safety check will not necessarily include a servicing of an existing OFGSH, and is also not applicable to owner-occupied dwellings. As a result, more than 70 per cent of Victorian households have no mandated frequency in which gas safety must be checked, leaving them potentially vulnerable.

Ban on new installations (excluding like for like replacements) **– Option Two**

We are supportive of banning installations, and recognise that this option would allow the industry to adjust, and have a minimal impact on jobs.

However, for long term effectiveness, we prefer option three, as it is more likely to lead to fewer OFGSHs over time, and therefore we consider it is the best option to mitigate the associated risks of OFGSHs thoroughly.

Ban on all installations – Option Three

We consider that this is the most thorough option, and therefore has the greatest chance of significantly reducing the risk of illness or death as a result of a poorly functioning OFGSH.

We note that this option will only be relevant to new heaters purchased, and that a significant quantity of already installed heaters are likely to continue to be in operation for at least the next 20 years, as many people are not aware of the economic life of their heaters, and are likely to continue using them beyond this timeframe.

Standards-based approach – Option Four

A Standards-based approach has some merits, particularly in that the national coverage of Australian Standards could assist to make sure heaters in all states and territories are safe.

However, this is not our preferred option as the process is open to an additional community consultation period, and so may not be eventually introduced to the Australian Standards in its original form, and may not be introduced to the Standards at all.

If this was to occur, then the Victorian Government would still need to select an alternate option and implement it in order to comply with the Victorian Coroner's recommendation that OFGSHs be phased out.

We would support a Standards-based approach being explored in addition to either option two (ban on new installations) or a phased version of option three (ban on all installations), though we note that this would not be necessary in order to improve the safety of the Victorian community.

Complementary Measures

We support the inclusion of at least one, if not both complementary measures.

While the core options address, in varying degrees, new risks created by future installations of OFGSHs, the complementary measures are critical as they address risks borne by those who already have, and operate, an OFGSH.

If only one complementary measure is to be included, our preferred measure is the introduction of mandatory servicing requirements.

Mandatory installation of CO alarms

Carbon Monoxide alarms, if of an appropriate standard and properly maintained, could prevent illness or death by warning people of dangerous levels of carbon monoxide in the air.

However, there are a number of factors relating to the use and installation of Carbon Monoxide alarms that suggest this measure, while useful, is not sufficient on its own to adequately address the risks posed by OFGSHs.

A lack of an Australian standard for Carbon Monoxide alarms, significant differences in quality and limited measurement ranges of the alarms are all cause for concern. As is the potential for an alarm to lend a false sense of security, particularly if it has been incorrectly installed, not maintained or placed in an area that does not allow the sensors to accurately reflect the level of Carbon Monoxide exposure, are all examples.

Mandatory servicing requirements

We believe introducing a mandatory servicing requirement for all OFGSHs is the option with the greatest likelihood of preventing future illness or death in homes with existing OFGSHs, more so than mandating the installation of Carbon Monoxide alarms.

As discussed above, while installing an alarm creates a useful warning system, there are a number of factors which can easily lead to an alarm being ineffective.

Mandatory, two-yearly servicing would go a long way to reducing the risks associated with existing OFGSHs, by ensuring that the conditions which can lead to Carbon Monoxide leakage are unable to occur in the first place.

We believe this is a more thorough approach.

Preferred Approach

We prefer a phased ban on all installations, which we consider will most effectively limit future risk, while allowing the market and the workforce time to adjust, by permitting like for like replacements for a specified period of time.

We recommend partnering this approach with one or both of the complementary measures.

If only one complementary measure is adopted, we recommend the introduction of mandatory servicing requirements, as, if working effectively, this should prevent OFGSHs from becoming dangerous, as opposed to notifying residents once there is already a problem.

Learnings from the Gas Heater Replacement Program

As is mentioned in the Discussion Paper, the Department of Health and Human Services is nearing the end of the Gas Heater Replacement Program.

This Program provides useful lessons which we believe should be considered as part of an overall effort to phase out OFGSHs.

Community education about alternatives to OFGSH, and the cost of operating these alternatives, will be key.

Many people believe that OFGSHs are cheaper to run than other forms of heating, particularly electrical split systems. To the extent that they have had new, safe heaters installed, but are fearful of using them as they anticipate a very high electricity bill as a result.

Additionally, some people prefer the radiant style of heat that is emitted from OFGSH, as opposed to the warm air that is produced by a split system, for example.

Assisting people to understand how to most efficiently use other styles of heater, and what to expect from them will be important to overcoming resistance from people who are reluctant to change their heater.

In some cases, it may be necessary for support networks in the community – such as friends, family, home visiting nurses or social workers – to convince people to comply with new rules about heaters, or to consider a different heating option.

It is our view that community awareness about any changes will need to be tailored to a broad range of audiences, and also include information about choosing the right heating option for your home as well as electricity usage.

Conclusion

Thank you for providing us with an opportunity to provide feedback at the outset of this process.

We would be happy to provide further clarification or additional feedback throughout the process.