

Australian Government
Productivity Commission
By email: www.pc.gov.au/inquiries/current/repair

1 February 2021

Submission to 'Right to Repair, Productivity Commission Issues Paper, December 2020'

Thank you for the opportunity to comment on this paper.

By way of background, Rinnai Australia has 5 Australian manufacturing facilities and employs in excess of 600 staff across the country. Many more people are directly employed involved in the sale, installation and aftermarket servicing of our products which are sold under many brands including Rinnai, Bravis, APAC, Hotflo, SE, Sunmaster and POLO.

Rinnai is a major supplier of all varieties of residential and commercial water heating and climate control technologies into the Australian market with an annual turnover of nearly \$500 M and a brand reputation that is held in high regard. We are the second largest supplier of water heating products in the Australian market and technologies include electric storage, heat pump, solar and gas. We are a major supplier of various heat pump air heating and cooling products, gas space heaters and gas ducted heaters. Many of our products are locally designed and manufactured. Indeed, Rinnai invests over \$3 million pa into local product research and development. We have an extensive network of accredited contractors around the country whom perform installation, servicing, fault finding and repair work on our behalf.

Rinnai fully support the submissions by the Australian Water Heating Forum (AWHF) and Gas Appliance Manufacturers Association of Australia (GAMAA) regarding this subject. The majority of our appliances require installation by licensed professionals and are installed as parts of complex systems. In this regard, we emphasise the following points:

- a. Manufacturers should have the first right to repair when their product is under express warranty or the consumer guarantee provisions of the ACL apply. The ACL currently provides no protections for manufacturers in this regard. We have numerous cases where consumers have their product repaired by an independent third party under warranty without contacting Rinnai first, then send us their bill and seek re-imbusement claiming that is their 'right' under the ACL. Often the re-imburements claimed are much higher than what our own costs would have been to resolve matters and in many cases our product was not at fault.

- b. Further to (a), expertise is required to properly diagnose and repair problems with installed products and the complex systems they are a part of. In many cases, when problems arise our products are not at fault, rather it is another component in the system or improper commissioning or design of the system. Accredited contractors whom receive ongoing training from manufacturers are the best placed to provide the required expertise to resolve the matter.

Please feel free to contact me if you have any queries relating to this submission or would like more information on this matter from the Rinnai perspective.

Best Regards

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