

Australian Government
Productivity Commission
Online submission

23 July 2021

RE: Right to Repair Draft Report Consultation, June 2021

Thank you for the opportunity to comment on the draft consultation papers.

By way of background, Rinnai Australia has a number of Australian manufacturing facilities and employs in excess of 700 staff across the country. Many more people are directly employed involved in the sale, installation and aftermarket servicing and repair of our products which are sold under many brands including Rinnai, Brivis, 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 exceeding \$500M 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, gas and geothermal. 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 Rinnai trained and accredited service providers around the country whom perform installation, servicing, fault finding and repair work on our behalf.

The vast majority of Rinnai products are complex, expensive and long lasting and form part of complex systems that require assembly, installation, commissioning, fault finding and repair by specialist technicians, such as our accredited service providers. In the context of Right to Repair, we strongly believe our product range warrants specific consideration with respect to repair service providers, spare parts and manufacturer warranty.

Rinnai fully support the submissions by the Australian Water Heating Forum (AWHF) and Gas Appliance Manufacturers Association of Australia (GAMAA) regarding this subject.

Rinnai, like AWHF and GAMAA, does not support draft PC recommendation 4.2 that text be included in manufacturer warranties that states that entitlements to consumer guarantees do not require the use of repair services and/or spare parts authorized by the manufacturer. Rather, for warranty repair claims on complex and installed products the ACL should place an obligation on the consumer to approach the manufacturer in the first instance.

We also do not support the provision of ACCC guidance as to how long major categories of common household product within specific price ranges can be expected to last without fault. We assume the expectation is that the consumer does not have to pay for repairs and parts during this timeframe. Our main reason is that we are not aware of any widespread consumer perceptions that our products are not durable. Indeed, many of our products last multiple decades.

The AWHF and GAMAA responses outline the reasoning in more detail.

Please do not hesitate to engage further with Rinnai on this matter.

Best Regards

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