

Submission 78 - Product Presence Pty Ltd

Product Presence Pty Ltd made submission 2 to the inquiry into non-conforming building products in the 44th Parliament.

This document is intended as a supplementary submission to the original submission 2.

All submissions received in the 44th Parliament can be accessed via the following link:

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/Non-conforming_products/Submissions

Senate Inquiry into Non-Conforming Building Products
Conducted by the Economics References Committee

November 7, 2016

Response from Product Presence Pty Limited

November 7, 2016

Senate inquiry into non-conforming building products to be conducted by the Economics References Committee.

economics.sen@aph.gov.au

Product Presence Pty Limited welcomes the opportunity to provide input into this re-referenced inquiry, as notified by the Committee Secretary on October 19, 2016. This submission is an updated version of the previous submission made by Product Presence on July 14, 2015.

Under the existing terms of reference Product Presence will respond to:

(c), (vi), Independent verification and assessment systems

Our response also supports the following points:

(c), (v), Policing and enforcement of existing regulations and
(c), (vii), Surveillance and screening of imported building products

Under the additional terms of reference related to asbestos, our response also supports the following point:

(c), (iii), Policing, enforcement, surveillance and screening of imported products, including restrictions and penalties imposed on importers and end users of products containing asbestos.

1. Introduction:

It is suggested that a single point of reference in the form of a central product registration system (database) would be required to help address the problem of non-conforming building products. We understand this would form an essential part of the overall terms of reference and supports compliance checking, verification and enforcement processes for building products.

In our opinion Australia should adopt this central register for building products that are deemed to have critical safety requirements, such as electrical, structural and other product types. It would still be the responsibility of the product owner to insure that the products sold into the Australian marketplace meet all safety requirements and standards, with heavy penalties applying for non-conforming building products.

Product Presence seeks to offer an online building product registration system to capture, publish and manage conforming building products and related supporting documentation for products sold into the Australian marketplace. Our current system, named 'CE files' is based on the European CE marking scheme and could be updated and rebranded to support Australian industry requirements.

2. Features and functions of the CE files system:

The CE files service is a searchable online portal, that is mobile device compatible, where product compliance information can be obtained. An independent 3rd party could operate the software and administer the supporting services if need be.

The intention of our online service would be to provide a simple, single point of reference for regulators and users to find relevant technical information about a building product and its application to show that it fulfills critical requirements under Australian Standards and/or the Building Code of Australia.

The CE files service makes proof of compliance information easy to understand and easy to find for regulators and buyers via a simple and unique product specific web page and accompanying link that can be affixed to the product or packaging, for example:

<http://www.cefiles.com/43753>

<http://www.cefiles.com/43750>

It is also possible to have the above product specific web pages accessible via a barcode by using a mobile device.

Each CE files product information page could accommodate and cross-reference existing compliance schemes already operating through various industry groups. Cross-referencing would be facilitated via the uploading of supporting files or by embedding links to existing compliance schemes into each product specific web page.

For traceability, the legal entity responsible supplying the product into the Australian marketplace is required to register for the online service and be approved prior to submitting their building products to the online register. Each product would also require checking and approved prior to publication.

The register would provide information about the product, including testing and certification information and supporting documentation. Additionally, we also suggest that CE files users receive product specific notifications that are published via the product web page and/or directly via email notification.

3. Benefits of the CE files system:

Instant and direct access to unique product information pages via a web link applied to the product or packaging.

Product specific information pages that would cross-reference existing compliance schemes and would cross-reference product barcodes.

An online company registration process with approvals controlled at both the company and product approval levels.

Product conformity information that is linked to a specific product and company.

The system facilitates a reduction in packaging cost and paper waste via the use of e-filing.

Provides access to up to date product data in real time by allowing product owners to instantly deploy new documents and updates to regulators and users in a timely and low cost manner.

Does not require extensive support due to simplified user interface design. Each product page takes only a few minutes for a product owner to create via a simple form, without any web development skills.

A scalable and stable platform that may be expanded over time as customer requirements change.

It is a mobile compatible solution that is available to users 24 hours a day, 7 days a week.

The current system can be viewed at: <http://www.cefiles.com>

4. Recommendations:

To serve regulators and users, an independent data base solution is needed which meets the following conditions:

Product information pages must be accessible to any one at any time.

Access to product information pages must be direct and unambiguous.

Product information must be accessible throughout a mandatory period of time after the products were last placed on the market.

Where applicable, the online service should host additional documentation that may be required according to relevant regulation(s).

5. Further recommendations:

Trial implementation of the CE files system that fulfills the requirements set out in points 2 & 3.

Trial implementation to be carried out in a staged format, to confirm suitability for particular product types/categories.

6. Other building product registers:

In the USA a large, vertically integrated, non-profit organisation named UL (formally Underwriters Laboratories) operates a large-scale database containing UL certified products, which includes electrical and building products.

UL recently introduced a 'mobile product page' and a 'smart product mark' solution, which gives regulators and buyers instant access to product certification information. Link provided below:

<https://markshub.ul.com/>

The CE files product database solution referred to in our submission pre-dates the UL solution and already includes functionality that is referred to in the UL 'mobile product page' and a 'smart product mark' solution, such as:

1. Mobile device compatible product web pages
2. Unique product web page address
3. A unique product page ID number

7. Closing statement:

The advantage is obvious: a single point of reference and a single starting point for building product information instead of multiple state, company, reseller or individual contact points.

The service would also facilitate trade and further promote the supply of safe and compliant products to the Australian building industry.

Yours sincerely,

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Product Presence Pty Limited