



15 January 2010

Dr Ian Holland
Secretary
Senate Environment, Communications and the Arts References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Dr Holland

Senate inquiry into Energy Efficient Homes Package (Ceiling Insulation)

Standards Australia welcomes the opportunity to comment on the Senate Inquiry into Energy Efficient Homes Package (Ceiling Insulation). As you would be aware, a number of Australian Standards are referred to as guidance material under the Commonwealth Home Insulation Program and/or mandated in regulation in several jurisdictions.

Standards Australia does not have particular comments to items under the Terms of Reference for this inquiry, but makes the following brief remarks, which we hope will be useful to inform the Inquiry.

Under the Commonwealth's Home Insulation Program guidelines, ceiling Insulation must comply with the following Australian Standards:

- > **AS 3999-1992** 'Thermal insulation of Dwellings – bulk installations – installation requirements', with installers explicitly directed to substitute the requirements on this Standards with **AS/NZS 3000-2007** "Electrical installations (known as the Australian/New Zealand Wiring Rules)" requirements for the minimum clearance distances from recessed luminaries; and
- > **AS/NZ 4859.1:2002** (incorporating Amendment 1, Dec 2006) 'Materials for the Thermal Insulation of Buildings'

Whilst the guidance provided under the program is believed to be appropriate, Standards Australia has recently received feedback from various stakeholder groups with respect to the

currency of AS 3999-1992. Australian Standards are living documents and we have recognised the need to examine the currency and appropriateness of our technical documents which relate to insulation installations.

Standards Australia is currently undertaking broad stakeholder consultation on possible courses of action.

Should this matter be raised as part of this Inquiry, in conjunction with the outcomes of our consultation, Standards Australia would welcome the recommendations of Senate Environment, Communications and the Arts References Committee to ensure the documents are apt and thoroughly address safety issues.

Should you have any questions or would like to discuss any aspect of this response, please do not hesitate to contact me. For your information, appendices A and B provide up-to-date background on Standards Australia.

Yours faithfully

Colin Blair
Acting CEO

Appendix A: Standards Australia

Standards Australia is recognised by the Commonwealth Government as the nation's peak Standards body. It is a not-for-profit, non-government organisation that coordinates standardisation activities and facilitates the development of Australian Standards® by working with Government, industry and the community.

Standards Australia also promotes excellence in design and innovation through the Australian International Design Awards.

Standards Australia responds to national needs for contemporary, internationally aligned Standards that deliver Net Benefit to Australia (ie the benefits must outweigh the costs – all Australia Standards must have a positive effect on relevant communities of interest) (**Net Benefit**) by:

- coordinating representation of Australian input into international standards development and adoption, promoting information exchange and knowledge management through our National Standards Office (NSO);
- accrediting Standards Development Organisations (SDOs) through the highly autonomous Accreditation Board for Standards Development Organisations (ABSDO); and
- developing internationally harmonised Australian Standards and other normative technical documents through expert Committees within Standards Australia Standards Development (SA SD) as a major ABSDO accredited SDO.

Standards Australia is Australia's member of the Pacific Area Standards Congress (PASC), International Organization for Standardization (ISO), the International Electrotechnical Commission (IEC) and the International Council of Societies of Industrial Design (ICSID), providing a direct link to the regional and international arena and creating further efficiencies. It offers support to Government in relation to such fora as the APEC Standards and Conformance Subcommittee (ASPEC SCSC) and to business through the APEC Business Advisory Council (ABAC).

Standards Australia has a catalogue of around 7,000 existing standards, which it maintains in order to ensure currency and order. Standards Australia's standards development activities are undertaken in compliance with the World Trade Organization Agreement on Technical Barriers to Trade. Standards Australia has over 450 active projects currently under development.

To support this work and assist the interface between non-government standards legislation and regulation, a Memorandum of Understanding (MoU) has existed between Standards Australia and the Commonwealth Government since 1988, as reviewed from time to time.

Australian Standards set specifications and guidelines to ensure the quality, safety, reliability and consistency of products and services, developed in accordance with ABSDO's Requirements for Accreditation of Standards Development Organisations and Criteria for Designation as an Australian Standard. These specify the effort required of consensus

groups such as Technical Committees under the authority of an accredited SDO to achieve consensus and ensure the interests of all stakeholders are considered during the development of an Australian Standard.

In October 2008, Standards Australia introduced a new business model to improve Standards development processes, enhance engagement with stakeholders, and provide stakeholders with choice in development pathways. The new business model allows Standards Australia Standards Development to focus its limited resources where they can deliver the most benefit to Australia, and will ensure its long-term financial sustainability in perpetuity.

This new business model was introduced following extensive stakeholder consultation conducted by Standards Australia. The new business model also takes into account and aligns with recommendations put forward by the Productivity Commission in its 2006 review and report on Standard Setting and Laboratory Accreditation. These recommendations included that the development of Australian Standards be supported by the client government agency, for domestic standardisation activities (Recommendation 9.1 of the PC Report in November 2006).

Standards Australia is a public company limited by guarantee. More than 70 of Australia's leading industry, government and consumer organisations form the Members of the Standards Australia Council. The Council has the responsibility to elect the Board of Directors, the Accreditation Board for Standards Development Organisations (ABSDO) and to appoint new Members to the organisation. The Standards Australia Council is responsible for the general oversight of standardisation in Australia and the governance of Standards Australia.

Appendix B: What is an Australian Standard®?

Australian Standard® branded standards are developed by accredited Standards Development Organisations (including Standards Australia) in accordance with ABSDO's criteria and requirements [refer to www.absdo.org.au and www.standards.org.au (then follow HOME › AREAS & ACTIVITIES › COORDINATION & INFORMATION)]. These websites list a number of documents concerning the accreditation process, including:

- NSO Procedure 1: Standards Development Projects;
- Requirements for Accreditation of Standards Development Organisations;
- Criteria for Designation as an Australian Standard;
- Access to Australian and International Standards;
- Numbering of Australian Standards; and
- The Guide to Net Benefit.

The development of Australian Standards involves voluntary participation from relevant industry, government, community and other interested parties via balanced technical committees. Australian Standards are documents that are regularly reviewed to allow for research, changes and advancements in community expectations, technical, legal and environmental factors.

Australian Standards offer a mechanism for guidance with which compliance is not mandatory unless the Standard is incorporated into law by government.

The decision as to whether a Standard will become mandatory and given regulatory effect is usually indicated at the commencement of the Standards development process as a result of regulatory arrangements managed by various Commonwealth, State and Territory government bodies.

Standards are developed according to due process which provides them with their authority and widespread acceptance. That due process is centred on consensus, transparency, participation on a non-discriminatory basis and impartiality.

The Standards development process within Standards Australia Standards Development involves the following steps:

- Request for development of a new Australian Standard;
- Evaluation on national needs, costs and benefits;
- Approval of new Standards development project;
- Committee formed;
- Committee develops draft;
- Public comment on draft;
- Consideration of comments;
- Ballot; and
- Publication.