



The Institute of Plumbing Australia

Incorporated

Founded 1954

ABN 93 721 622 941

BY EMAIL

16 August 2007

The Chairman
Standing Committee on Environment and Heritage
P O Box 6021
Parliament House
Canberra ACT 2600

Submission No:	4
Date Received:	16/8/07
Secretary:	

RE: INQUIRY INTO THE REGULATION OF PLUMBING PRODUCT QUALITY IN AUSTRALIA

Dear Sir,

The Institute of Plumbing Australia Incorporated makes the following submission to the above inquiry:

In particular we comment on the impact of the regulation of the Water Efficiency Labelling and Standards (WELS) Scheme on the installing Plumber.

The Australian/New Zealand Standard called up by WELS, AS/NZS 6400:2005, refers by "note" to the possible need for "WaterMark Certification" requirements of the Plumbing Code of Australia (PCA), unfortunately not all Australian States and Territories have adopted the PCA although most if not all Plumbing Regulators utilise the WaterMark Certification as a means of identifying plumbing products allowed to be installed in plumbing systems connected to the infrastructure of the Network Utility Operators within their jurisdiction.

Licensed Plumbers are required by the terms of their license to certify that installed plumbing products comply with the requirements of the regulator, in other words are WaterMark Certified.

WELS regulation imposes yet another level of regulation and the ensuing confusion on the person at the end of the line, the installing plumber and also adds to the problems of specifiers and independent certifiers of plumbing installations. Add to this the inability of State and Territory Plumbing Regulators to agree on a single set of regulations and licensing requirements despite the requirement by Australian Governments (COAG) that they "harmonise" licensing across Australia and you have the recipe for chaos.

When the WELS scheme was first outlined to industry the proposed concept appeared to solve many problems with what was muted as being point of sale control allowing only approved plumbing products to be sold. The argument against this control is put that not all plumbing products are installed in regulated systems; in the case of drinking water supplies there are numerous small private supplies fed from ground water, rain water or even river/stream water, if the end product is for drinking it may, due to the sometimes dubious quality of the water, be even

CHAPTERS IN ALL STATES OF AUSTRALIA see Website: www.plumbing.org.au
Institute Secretariat Postal Address: P O Box 2005 MARMION WA 6020
Fax. +61 8 9448 0420 Mob. +61 0418957383 Email: secretary@plumbing.org.au





more important that the added problems of lead leaching from poor quality brass components or chemicals from components such as sealing rings, washers and even the grease used to lubricate the assembled parts are prevented by only allowing approved plumbing products to be sold in Australia. The WELS scheme that has eventuated has been watered down from those earlier concepts that we understand were signed off with the manufacturing industry and now adds to the miss match of regulation across Australia.

This watering down process has extended to the ludicrous situation where we may have a non-approved plumbing product registered with WELS as non-compliant with the WELS standard AS/NZS 6400 but displayed and sold with a mandatory WELS label. This product does not save water and is not allowed to be installed in over 90% of plumbing systems in Australia, if this does not send the wrong message to the buying public nothing will.

The problem in all this for licensed plumbers is when a client purchases a WELS labelled plumbing product that is not watermark certified the Plumber must, to protect their license and livelihood, refuse to install the product if it is to be connected to a regulated plumbing system. This upsets the client who may then take illegal methods of installation but above all it brings what could be a major contributor to water conservation, the WELS scheme into disrepute.

In closing, the Institute of Plumbing Australia encourages the Inquiry Committee to seriously consider a much closer alignment between the Water Efficiency Labelling and Standards Scheme and the WaterMark Certification.

Yours sincerely,

Stephen J Movley Hon.FIPA
Institute Secretary
Mobile: 0418 957 383
Email: secretary@plumbing.org.au