

SCANGROUP

Submission No 104

To: Committee Secretary
House of Representatives Standing Committee on
Legal and Constitutional Affairs
PO Box 6021
Parliament House
CANBERRA ACT 2600
AUSTRALIA

RECEIVED SM
11 MAR 2009
BY: LACA

From: Claus Oustrup, Scangroup Pty Ltd
Re: AS 1428-1 draft of 02/02/09

Dear Madam/Sir,

I would hereby like to object to the draft of AS 1428-1 of 02/02/09. I believe the following points are incorrect and should be amended the following way:

Ref page 65

Width of back rest

Current draft specifies width of back rest to be 390 to 400 mm. This should be allowing more tolerance and range from 280 mm.

Reason:

In the design of our WC cistern which is bolted onto our free standing WC pan the most comfortable and ideal back support was part of the design brief. The lower part of the cistern is 350 mm wide and the top part tapers in to 280 mm. After both European and Australian testing we have only received positive feedback about the comfort and safety of the cistern as back support.

Ref page 66:

Top of back rest:

Top of back rest is maximum 860 mm. This should be maximum 930 mm.

Reason:

The maximum allowed height of the pan and seat is 480 mm and the average WC seat lid is 450 mm deep. If the seat lid is raised on an increased height pan it comes to a height from the floor at 930 mm. There is therefore no reason to limit the back rest to 860 mm.

Height of back rest:

The current draft specifies the back rest to be between 150-200 mm high. There should be only a minimum depth and not a maximum.

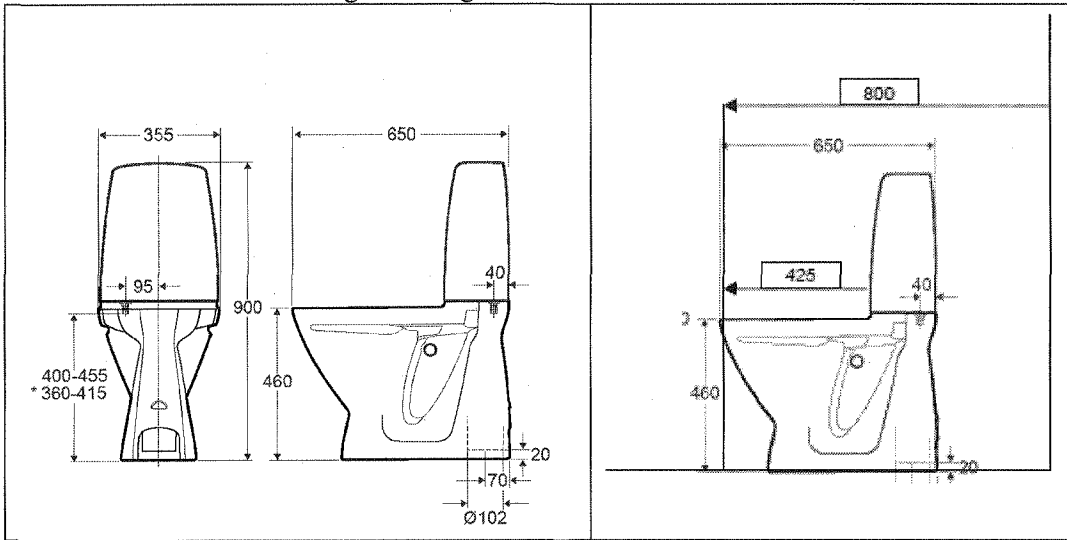
Reason:

If the back rest is more than 200 mm it will only give added support and increase the assistance.

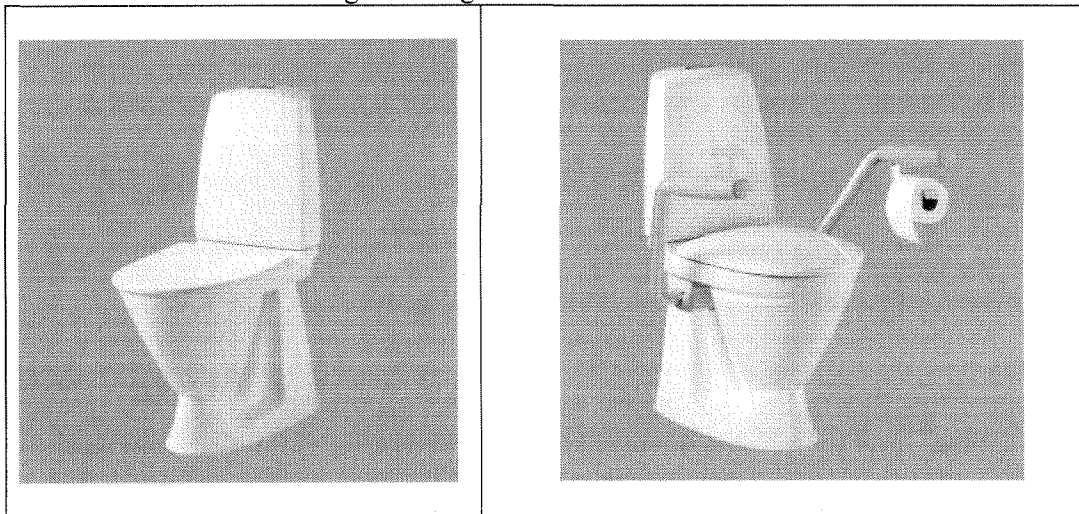
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As a reference please find the measurements of our increased height WC, which we believe would be ideal and suit a modified AS 1428:

Ifo Care 6861 increased height WC figure 1:



Ifo Care 6861 increased height WC figure 2:



With best regards,

Claus Oustrup