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Submission to the

## **INQUIRY INTO THE REGULATION OF PLUMBING PRODUCT QUALITY IN AUSTRALIA**

Parliament of Australia  
House of Representatives  
House Standing Committee on Environment and Heritage

Prepared by the

Master Plumbers and Mechanical Services Association of Australia  
23 August 2007

# Inquiry into the regulation of plumbing product quality in Australia



## The Master Plumbers and Mechanical Services Association of Australia (MPMSAA)

Australia's Largest Plumbing Industry Association, representing over 1800 employer businesses across Australia.

The Master Plumbers' & Mechanical Services Association of Australia (MPMSAA) is a registered national employer organisation providing representation and extensive services for a broad base of members in the plumbing and mechanical services sectors, the principal activities of the association is to provide business services, industry representation, training and advice on industrial relations and employment to the membership.

The MPMSAA is a not for profit organisation. It was established in 1891 and since that time the Association has continued its reputation as a powerful, reputable national plumbing industry lobby group.

The MPMSAA has executive divisions representing the following sectors within the plumbing industry;

- Construction Division
- Services Division
- Gas Division
- Heating and Cooling Association
- Environmental Plumbing Division.
- Metal Roofing Division
- Australian Rainwater Industry Development Group (ARD)
- Asbestos Division
- Fire Division

Over the past 6 years MPMSAA have delivered a national GreenPlumbers® training and accreditation program supported by various Commonwealth, State and Local Government Departments. To date we have accredited over 5400 plumbers representing more than 3000+ across all States/ territories of Australia.

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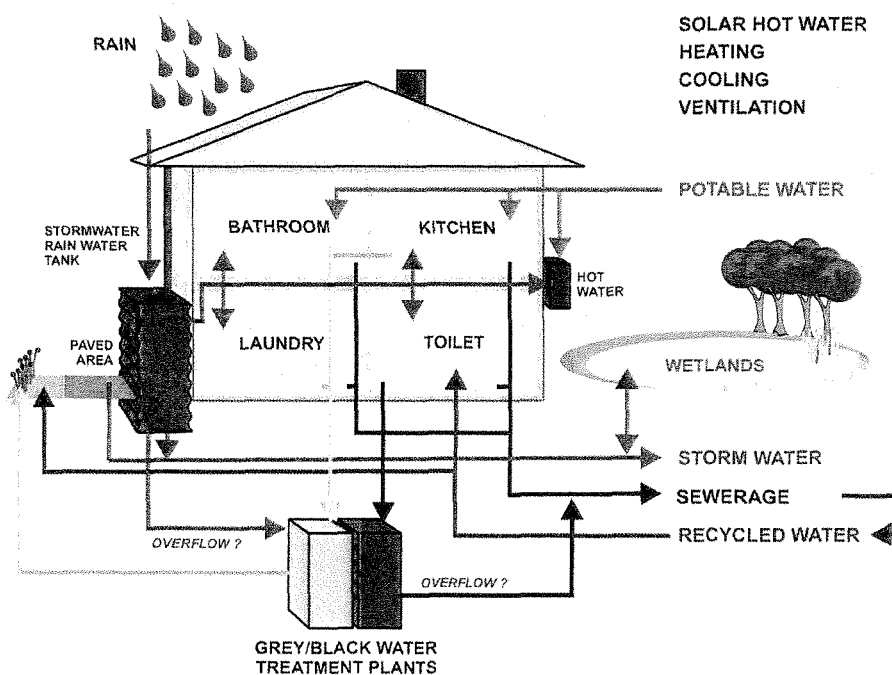
Web [www.plumber.com.au](http://www.plumber.com.au)

## Inquiry into the regulation of plumbing product quality in Australia

There is an increasing amount of products and plumbing fixtures entering the Australian Market. The current water and energy saving focus among Australian governments and wider community has also dramatically increased the range of technologies in solar hot water, rainwater and greywater products. MPMSAA believe the current complexity in regulation and lack of policing through individual State plumbing authorities is not sufficiently protecting the community, and placing the liability onto the individual plumbing business.

MPMSAA believe the current National (Water Efficient Labeling Scheme) WELS and Watermark certification schemes, that is required for some plumbing products could easily be expanded to cover all plumbing products.

It is estimated that over 70% of the water and energy savings that can be achieved in buildings is related to plumbing installations. Many governments over the past 3 years have introduced a range of environmental sustainable plumbing regulations, which in turn has increased the water and energy saving market, and has dramatically increased the type and range of products now available (mainly imported technology).



MPMSAA believe a consistent national plumbing product approval system will also provide a scale of economy for manufacturers, importers and plumbing installations as currently some products have to be approved in each individual state/territory. (Greywater product approval is a current example where manufacturers need to apply to each individual plumbing / environmental authority for approval to install in each state / territory)



To assist a national product approval process, MPMSAA would also strongly encourage all State plumbing authorities to recognise and adopt the Plumbing Code of Australia (PCA)

Currently State and territory plumbing regulations restrict the installation by licensed/registered plumbers to products that meet Australian Standards.

- Water efficient products – WELS
- Drainages and water supply – WaterMark
- Many other products need to meet various local and state requirements

However any plumbing product meeting an Australian Standard or not, is allowed to be sold in Australia. Currently it is possible for consumers to purchase plumbing products that licensed plumbers are not allowed to install.

Many local plumbing authorities also have a self certification scheme for plumbing installations with minimal auditing in place. Currently only installations that are completed by a licensed / registered plumber with a “compliance certificate” returned to the local individual plumbing authority could be subject to an installation audit. Usually a small proportion of plumbing installations are audited, with no process in place for auditing installations that do not return a “compliance certificate, this current system only checks plumbing installations (and plumbers) who try to do the right thing.

MPMSAA believe point of sale legislation, limiting the purchase of all plumbing product to licensed plumbers / builders would greatly assist in maintaining public health and improve the environmental water and energy saving capacity.

While MPMSAA would support the introduction of a national product approval and point of sale scheme, further research is needed as to not adversely impact on the overall cost of products by having a over complicated or expensive scheme, which would be funded predominantly by industry/manufacturers.



### **Trade implications of controlling plumbing product quality**

- Anecdotal information from members suggest that overseas manufacturers will deliver to order ie:- marked with any symbols you request, ie: - WaterMark, AS or WELS. Increased policing of imported products would need to be included into a national scheme to protect all stakeholders.
- Curenly Financial implications of using WaterMark/WELS product is expensive compared to unendorsed products
- Currently consumers being quoted installation with unmarked products place pressure on contractor's to install cheaper products

MPMSAA believe all of these issues could be reduced substantially with an effective national plumbing product approval and point of sale scheme.

### **Potential improvements to the plumbing quality regulatory system**

- There needs to be active 'Third party' government monitoring of plumbing products being offered at retail outlets.
- Central control of regulation rather than existing fragmented local / state existing system. The current National Plumbing Regulators Forum (NPRF) manage/ develop the main plumbing codes (ie AS/NZ3500) however little input is requested from industry stakeholders, and the inclusion of new technology is slow to be accepted. Acceptance of new technology usually requires the individual manufacturer to approach each state/local plumbing authority for "approval".
- MPMSAA would strongly support consistent National Regulations that are based on performance outcomes, which do not limit new innovative technologies. MPMSAA believe a more inclusive approach to standards development involving industry would assist in developing Australia a world leader in sustainable plumbing practices.

### **The appropriate level of government to administer plumbing product quality regulation, that is, the states (as is now) or the Commonwealth.**

- MPMSAA favors State level enforcement of centralised national regulations.

State / local plumbing authorities need to commit to a centralized regulatory system to ensure its effectiveness. Currently all state plumbing authorities reference AS3500, however many have introduced there own variations and amendments, (in some cases - NSW these variations are over 150+ pages). MPMSAA believe a National body controlling / coordinating the regulatory system and product approvals could be managed/ coordinated by the state authorities.



## Recommendations

### **Recommendation 1. National Plumbing product approval scheme**

MPMSAA believe the current National (Water Efficient Labeling Scheme) WELS and Watermark certification schemes, that is required for some plumbing products could easily be expanded to cover all plumbing products.

### **Recommendation 2. Point of Sale Legislation**

MPMSAA believe point of sale legislation, limiting the purchase of all plumbing product to licensed plumbers / builders would greatly assist in maintaining public health and improve the environmental water and energy saving capacity.

While MPMSAA would support the introduction of a national product approval and point of sale scheme, further research is needed as to not adversely impact on the overall cost of products by having a over complicated or expensive scheme, which would be funded predominantly by industry/manufacturers.

### **Recommendation 3.**

#### **Greater Industry support into the development of National Plumbing Codes**

Central control of plumbing regulation rather than existing fragmented local / state existing system. The current National Plumbing Regulators Forum (NPRF) manage/ develop the main plumbing codes (ie AS/NZ3500) however little input is requested from industry stakeholders, and the inclusion of new technology is slow to be accepted. Acceptance of new technology usually requires the individual manufacturer to approach each state/local plumbing authority for "approval".

MPMSAA would strongly support consistent National Regulations that are based on performance outcomes, which do not limit new innovative technologies. MPMSAA believe a more inclusive approach to standards development involving industry would assist in developing Australia a world leader in sustainable plumbing practices

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## Appendix A

CSIRO Research

In 2004 MPMSAA partnered with CSIRO to research the current barriers to the greater uptake of alternative water harvesting.

One of the main barriers identified was the complex state regulatory system that is still in place today.