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<b>Secretary:</b> .....	<i>[Signature]</i>

07WS0744

Dr Mal Washer MP  
Committee Chair  
Standing Committee on Environment & Heritage  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Dr Washer

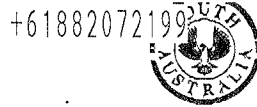
Further to your letter of 24 July 2007 regarding the regulation of plumbing product quality in Australia, I have received advice from the South Australian Water Corporation (SA Water) and herein comments related to each of the terms of reference for your inquiry.

The appropriateness and effectiveness of the current plumbing product quality regulatory arrangements:

- State legislation requires materials and products connected to SA Water's water and wastewater infrastructures to be appropriately certified.
- Infrastructure products reference the quality regulatory requirements.
- A product is risk assessed to establish an appropriate level of certification and tested for conformity against the appropriate Standard.
- Assessed product is issued with a plumbing safety certification mark, which is displayed on the product for referencing. Products undergo continual assessment to ensure conformity with certification.
- The regulatory requirements are referenced by industry stakeholders when specifying product.
- Regulators audit for the installation of authorised products meeting their appropriate plumbing safety standard.
- Conforming products have been deemed compliant with an appropriate Standard for plumbing safety and suitable for their intended application in Australian plumbing systems.
- Non conforming product does not provide that level of assurance to the end user that it is fit for purpose, is safe and will not fail prematurely.
- Importers, developers, manufacturers, wholesale and retail outlets are informed of the plumbing safety requirements and to ensure that product is certified.

Scale of environmental benefits from controlling plumbing products quality:

- Quality plumbing products are tested for the rigors of the water and wastewater environments within which they perform.
- Diverse water qualities and environmental conditions have the ability to affect lesser product or materials leading to premature failure and water loss.



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- Water supply materials are tested for the suitability to convey drinking water.
- Quality products undergo endurance testing to ensure longevity of in service life.
- Water using products incorporate design principles that ensure protection of the drinking water supply.
- A suitably tested water and wastewater product ensures that product's fitness for purpose, connectivity and provides the end user with the assurance that when installed it will perform satisfactorily.
- Product diversity does not make one product suitable for all applications and controlling product quality ensures that the product is suitable for the intended purpose/application.
- An industry practitioner responsible for installation has the assurance that the product has been adequately assessed and is fit for purpose.

Trade implications of controlling plumbing products quality:

- A controlled plumbing product provides the community with an assurance that the product is fit for purpose, may be connected to plumbing infrastructure, and will perform satisfactorily under specified conditions.
- A manufacturer of an approved product is to provide a warranty which must be included or available for the product when sold, there is no such requirement for product not controlled.
- A plumbing practitioner who purchases a controlled product has the assurance that the product has been assessed and manufactured to an Australian Standard and that the product undergoes continual conformity assessment.
- Products of controlled quality incur licensing, compliances testing and auditing which manufacturers include within the product cost.
- Product of non controlled quality imposes on the industry practitioner the responsibility of certifying an installation that may/may not perform satisfactorily in Australian conditions.

Potential improvements to the plumbing quality regulatory system:

- Point of sale legislation to ensure that all plumbing products deemed to comply, do so with the minimum material and performance requirements of an Australian Standard or equivalent.
- A prerequisite for Water Efficiency Labelling Scheme (WELS) or future water efficient products is that they comply with the relevant product Australian Standard.
- Products that can demonstrate compliance with an equivalent international standard receive prior recognition and have an appropriate licence issued.
- Recognition of overseas accredited testing and auditing facilities for the issuing of product certification.
- Reduce product auditing requirements to desktop/electronic or at product design change.

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- A central independent governing body that assesses product licensed/non licensed product to be fit for purpose, material attributes, plumbing safety and water conservation.
- A central register to manage and control authorised/unauthorised product for importers/developers/ regulators/industry practitioners to reference.

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

- As most of Australia's plumbing product manufacturing industry has gone off shore and those that remain are finding it difficult to maintain viability the Commonwealth with an approach similar to the WELS has the potential to provide overarching control.
- Plumbing regulators are typically state or local government based and the level of regulation of product varies from regulator to regulator dependant upon available resources.
- A central independent government body has the ability to administer a scheme through federal law for the importation of product and ensure that such goods meet the minium performance requirements of an Australian Standard or equivalent.
- A Federal governing body would also have the ability to progress plumbing product innovation nationally thus providing greater continuity in the approach to the management of future water supplies and making cities more sustainable.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Maywald'.

Karlene Maywald  
**MINISTER FOR WATER SECURITY**

14 September 2007