



National Plumbing Regulators Forum

***'Barriers to National Consistency'***  
**Industry Forum**

**13 March 2008**

**National Museum of Australia  
Canberra**



## Preface

On Thursday 13 March 2008, the NPRF conducted an Industry Forum in Canberra to consult and collaborate with representatives of the plumbing industry with regards to identifying barriers to national consistency and other issues of concern to the plumbing trades sector. The intent was to identify areas of agreement and dissension across industry sectors and to harness the combined commitment of these sectors to collaboratively develop a pathway forward.

The Industry Forum provided an opportunity for the NPRF to engage with key stakeholders and industry partners to discuss major issues and challenges facing the plumbing trades sector.

The NPRF thanks those industry stakeholders that provided their time to use the day to identify strategic priorities and identify areas where stronger working relationships and partnerships can be fostered.

The key issues raised during the workshop will form part of the NPRF's 2008/09 Operational and Business Plans and the current development of an Inter-Governmental Agreement to progress further plumbing regulatory reform.

As Chairperson of the NPRF, it gives me great pleasure to release the results of our Industry Forum held at the National Museum of Australia in Canberra on 13 March 2008.

Michael McGuinness  
Chairman, NPRF

# NPRF Industry Forum

## 'Barriers to National Consistency'

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## Introduction

The establishment of the National Plumbing Regulators Forum (NPRF) arose out of a report into the Review of the Australian Building Codes Board (ABCB) delivered in February 2000. The report recommended the establishment of a body to be a national forum for plumbing regulators, which would have responsibility for the development of a Plumbing Code of Australia (PCA), consistent in scope and structure to the Building Code of Australia (BCA).

There is no national regulator for plumbing. Regulation of plumbing work, licensing of plumbers and monitoring compliance with product certification standards has been the traditional responsibility of the States and Territories, forming a significant aspect of the protection of public health and safety, the environment and consumer rights.

Although prior to 2000 some uniformity of plumbing standards were achieved through the National Plumbing and Drainage Code – AS/NZS 3500 and the National Certification Plumbing and Drainage Products (NCPDP) scheme, the separate plumbing regulatory systems maintained by States and Territories remained largely inconsistent.

The NPRF is a cooperative arrangement between state regulators with statutory responsibility for plumbing regulation (New Zealand joined the Forum in 2006). It provides a forum to discuss and address regulatory issues, public health, safety, water conservation and other environmental issues.

The NPRF has also formed two subcommittees, the Technical Advisory Committee (TAC) and the Licensing and Education



Advisory Committee (LEAC), to assist with its functions and to contribute to the achievement of its goals. November 2006 saw the incorporation of New Zealand regulators into the NPRF. At the same time, the NPRF also took on the responsibility for transitioning the operations of the Australia – New Zealand Reciprocity Association (ANZRA) into its role, to eliminate duplication of work done by both organisations.

The NPRF is positioning itself as a coordinating body that can take responsibility for improving the coordination and cohesion of regulatory arrangements for occupational licensing, technical standards and controlling plumbing product quality in Australia, including the mandatory schemes, relevant standards and their application across jurisdictions.

## **Stakeholder Groups**

The NPRF's mission statement identifies three distinct stakeholder groups as follows:

### **Industry**

A number of industry groups have been established for members of the plumbing industry and associated professions and businesses. A primary concern of these groups, especially with regards to the transition of ANZRA into the NPRF, was that the level of industry involvement and consultation under the previous arrangement would be lost.

As recommendations by the NPRF with regards to licensing and training requirements, technical standards and product certification have the capacity to restrict or impact on the livelihoods of persons in various industries; responsibility exists to undertake appropriate consultation.



However, as the primary objective of the plumbing regulatory framework is to protect public health and safety and the environment; it is also the obligation of the NPRF to make industry members aware of the broader policy context of legislated requirements and to provide an avenue for industry consultation regarding the regulation of the industry and new and efficient plumbing practices.

The NPRF also holds a further responsibility to ensure open and satisfactory communications with those bodies that the NPRF has an agreement to participate in schemes or consultative processes with, in order to assure productive relationships and the survival and success of any such scheme.

## **Consumers**

Consumers, also more broadly defined in the NPRF's Purpose Statement as 'the public', have an implicit right to a healthy and safe environment and quality assurances in plumbing work, services and products.

As the collective instrument for those bodies charged with the protection of these rights, the NPRF has a responsibility to ensure that access to information on licensing, technical standards and product certification processes is readily available and clearly shows the benefits to consumers and community groups of appropriate and necessary regulation.

It is also important to inform consumers of issues at a national and Trans-Tasman level, and allow input from relevant consumer groups into broader debates.



## **Government**

While the NPRF exists through co-operative arrangements at present, it does formulate decisions that have a regulatory impact through its involvement on various Standards committees and appraisals of Australian Technical Specifications. Furthermore, the NPRF's intent is to formalise the body through an Inter-Governmental Agreement, resulting in policies and recommendations that will directly impact government bodies.

As the peak body for plumbing regulations and standards, the NPRF must ensure effective dissemination of its policies and activities throughout all levels of government. Conversely, the NPRF needs to make certain it is accorded proper consultation on plumbing-related issues and is cognisant of issues at differing levels of government.

Adequate communication will also facilitate greater communality of resources, reducing the instance of duplication of efforts or research.



## Relationships

### Working relationships model

The NPRF's working relationship model is constructed on the simple premise of maintaining a consistent improvement journey to ensure that the support we give has a clear improvement focus; that we achieve consistently high quality and that we can demonstrate the impact of what we do.

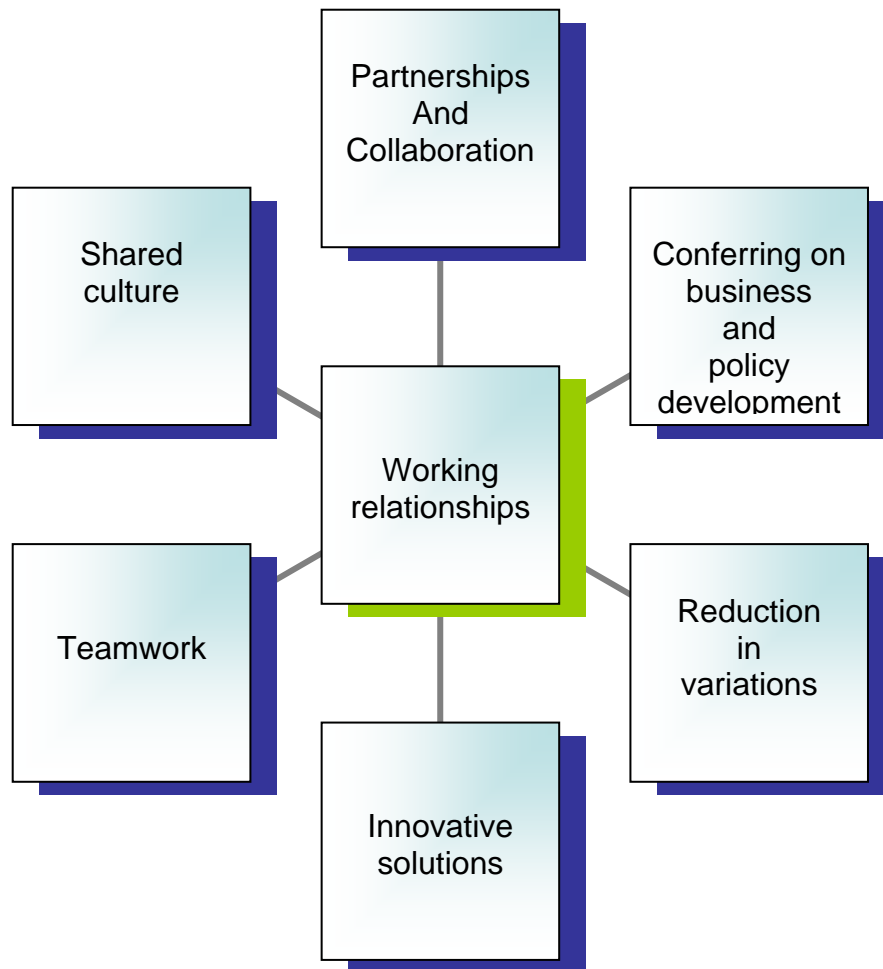
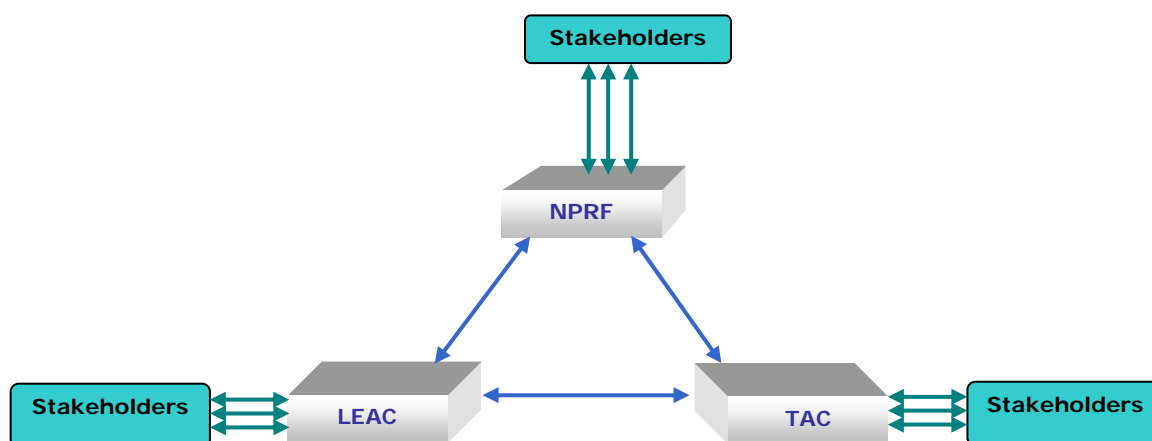


Figure 1 – Working Relationship Model



## Communication and engagement model

The NPRF communication strategy has been developed in accordance with our strategic objective to promote and establish effectual communication between the NPRF and government, industry and community stakeholders.



**Figure 2 – Communication and engagement model**

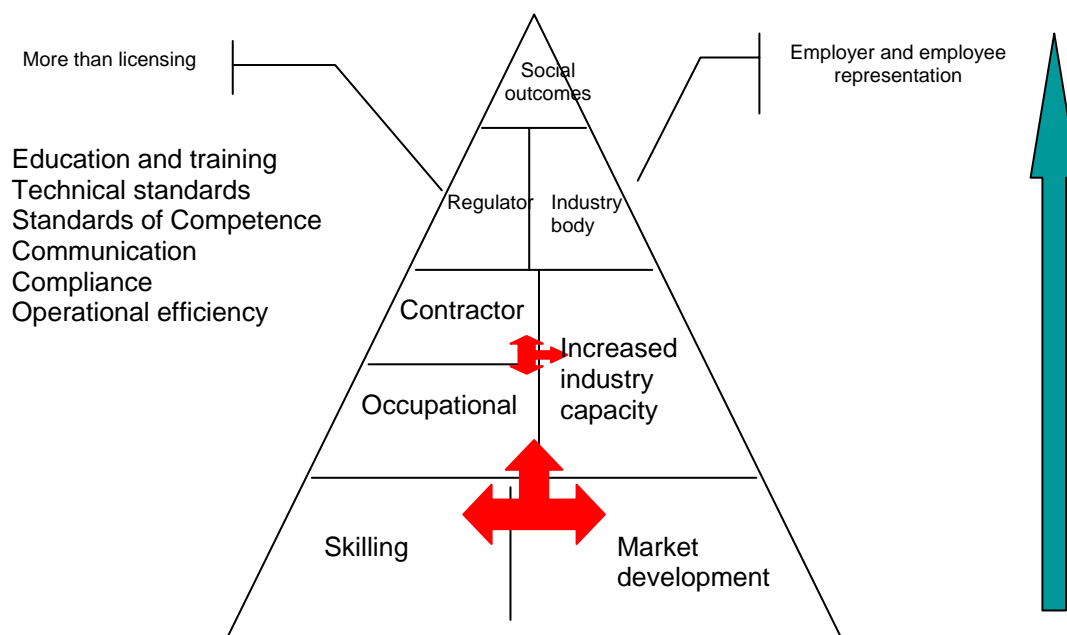
Effective communication is a key objective of the NPRF as it provides a foundation for the success of its goals and operations. Therefore, this strategy focuses on establishing channels and practices to facilitate the open exchange of information with relevant parties and promote awareness of the NPRF, its role and activities.

### Roles and relationships to others

The following diagram reflects the current role and relationship of the regulator and industry. It is important to note that the role of the regulator is more than just licensing. Similar can be said for industry through employer and employee representation. Together we are jointly responsible at different levels for education and



training, technical standards, standards of competence, communication, compliance and operational efficiency.



**Figure 3 – Roles and relationships**

## Codes

One of the key issues for the NPRF today is the relationship between the PCA and the BCA and the relationship between the NPRF and the ABCB. This relationship was considered in a report by the Productivity Commission on Reform of Building Regulation (known as the Laver Report), delivered in December 2004. The report notes a range of views for and against the incorporation of the PCA into the BCA. The view of the chairman of the ABCB was that a regulatory regime for plumbing be established that mirrors the ABCB, an Intergovernmental Agreement (IGA) be entered into for plumbing and the establishment of a Plumbing Codes Board. The final recommendation of the Productivity Commission in respect of this issue was that the ABCB should continue to work with the



NPRF to identify and resolve differences and remove unnecessary overlap between the BCA and PCA and on-site gas requirements.

Currently the building and plumbing codes and standards have areas of unnecessary overlap.

### **Plumbing Code of Australia**

The PCA, developed and maintained by the NPRF, outlines the provisions and requirements of the WaterMark Certification Scheme (WMCS), including the categories of plumbing products covered by the scheme. It is a reference document and is only given legal effect when invoked by legislation in the relevant state or territory.

Currently, the PCA has only been adopted, in part, by Queensland and, in full, by Tasmania, South Australia and the Australian Capital Territory (the latter with local variations). It should be noted however that Victoria is in the process of amending regulations so that PCA is recognised. In addition, the PCA largely adopts Australian Standards and it would have significantly more national relevance if it was to be developed along the lines of the BCA. Also, greater national recognition of the PCA would give regulators better ability to oversee policy development and implementation.

### **Building Code of Australia**

The BCA is produced and maintained by the ABCB on behalf of the Australian Government and each State and Territory Government. The BCA is a uniform set of technical provisions for the design and construction of buildings and other structures throughout Australia whilst allowing for variations in climate and geological or geographic conditions.



The BCA is adopted in each jurisdiction subject to the variation or deletions of some of its provisions, or the addition of extra provisions. The BCA model has been a major success from an industry point of view.

## **State Plumbing regulations**

States and territories are responsible for the regulation of plumbing practices and products. While the national mandatory schemes apply, and the PCA may be adopted, the states/territories retain power to regulate for local variations as they consider necessary or geographically appropriate. However, it should be noted that there are very few reasons for product or manufacturing standards to vary across jurisdictions. For example, some state water authorities and to some degree state health departments, has an interest where certain materials are in contact with drinking water, although the issues would be best managed consistently across Australia.

## **Relevant schemes and standards**

There is a need to coordinate product certification, product labelling and Australian technical standards as there are a number of schemes and standards with potential overlaps.

## **WaterMark Certification Scheme (WMCS)**

The WMCS is currently owned and administered by Standards Australia. Its duties include ensuring registration and licensing of products, ensuring conformity assessment and adherence to principles, managing a committee to oversee performance, and maintaining a national database of approved products.



## **Water Efficiency Labelling Standards (WELS) Scheme**

The WELS Scheme was established under the *Water Efficiency Labelling Standards Act 2005*. It is a joint initiative of the Australian, state and territory governments, that is administered by the Australian government. It focuses on the water efficiency performance of plumbing products. It does not cover aspects of product quality or public health and safety requirements.

The purpose of the scheme is to:

- conserve water supplies by reducing water consumption
- provide information for purchasers of water-use and water saving products
- promote the adoption of efficient and effective water-use and water-saving technologies.

The products that must be registered and labelled under the scheme are dishwashers, urinals and lavatory equipment, taps and tap equipment, showers and washing machines. Flow controller products can also be registered on a voluntary basis.

Greater integration of both the WMCS and WELS is not only desirable, but essential, to address industry and community confusion and frustration, to maintain industry and community confidence and ensure the quality of the plumbing products in the Australian marketplace and homes. Consumers and industry could clearly benefit from a closer relationship between these two schemes.



## **Australian Standards**

AS 6400 is the basis for the rating and labelling of products under the WELS Scheme. It sets out the criteria for each product.

AS 5200 contains technical specifications for plumbing and drainage products. It provides the criteria for accreditation of plumbing products under the WMCS.

AS/NZS 3500 is the National Plumbing and Drainage Code which covers standards for the materials, fittings and fixtures that can be used in plumbing and sanitary installations. It is used by all states and territories, even if they have not yet adopted the PCA.

Standards Australia committees are responsible for developing these Standards. For example, the WS-032 Committee developed the AS6400 standards. These Committees generally include wide representation from a range of government and industry groups.

## **Australian Technical Standards (ATS)**

ATS is a scheme that allows for the introduction of new product technologies that are not currently covered by an Australian Standard. An ATS is developed by an SA Committee and it is then ratified by the NPRF. The product then has two years in which to register under the WMCS. The status of the NPRF in this process should be recognised through an IGA.

## **Stakeholder or administering organisations**

There is a need to coordinate stakeholders and administering organisations as there are a number of issues with potential overlaps.



## **Department of the Environment and Water Resources**

The Commonwealth Department of the Environment, Water, Heritage and the Arts administers the WELS Scheme through its Water Resources Division.

## **Standards Australia (SA)**

SA is Australia's peak standards body that works to develop standards with a view to public benefit and the national interest. Overall, the organisation maintains around 7 000 standards through 1,500 Committees. It is also responsible for developing and administering Australian Standards for plumbing products in Australia. Under a Memorandum of Understanding, SA works in cooperation with the NPRF to codify standards developed for plumbing products.

## **Conformity Assessment Bodies (CABs)**

These are registered and licensed to certify products under the WMCS. This assessment process is monitored by Standards Australia.



## Summary notes from the Industry Forum Day

On Thursday 13 March 2008, the NPRF held an Industry Forum in Canberra to consult and collaborate with members of the plumbing industry throughout Australia with regards to identifying barriers to national consistency and other issues of concern. The intent was to determine the areas of broad agreement and areas requiring consideration across sectors and to harness the combined commitment of these sectors to the health of the industry to produce a way forward.

### Speakers

- Plumbing Coalition Australia – Mr Stephen Movley
- Master Plumbers and Mechanical Services Association Australia – Mr Adrian Hart, Master Plumbers Association, Queensland
- Institute of Plumbing Australia Inc – Mr Stephen Movley, Secretary
- National Plumbing Associations Alliance – Mr Murray Thomas
- CEPU - Plumbing Trades Employees Union – Mr Doug McClusky, Training Manager
- Mr Robert Farnham, the Chairman of TAPS Group Training Company in South Australia also spoke on the training package.

Without limiting their talk, speakers were asked to identify any outstanding issues they may have with regard to:

- Education and training issues,
- Regulatory issues;
- Licensing;
- Ways to improve operational efficiency and performance;
- Promoting acceptable standards of competence;



- Regulating the industry to achieve greater consumer and industry confidence; and
- Environmental and conservation outcomes

### **Emerging themes**

While views of speakers differed on some points, a number of issues were identified by all, from which four (4) distinct themes emerged:

1. Consumer and industry confidence
2. Regulatory issues
3. Education, training and licensing
4. Environmental and sustainability outcomes



## Workshops

Following the mornings' presentations simultaneous workshops were then run on the issues grouped under the first three themes. The fourth theme of sustainability spanned across these workshops.

## Consumer and Industry Confidence

Identified issues:

1. Cohesive, united plumbing industry
2. Adequately funded and resourced body
3. Maintaining industry voice in the transition from ANZRA into NPRF
4. Ensuring compliance and consistent application of plumbing regulation
5. Competence based licence renewal
  - a. Maintaining standards of plumbing
  - b. Adapting to change
6. Upfront and inclusive consultation in regulatory development processes
7. Acknowledging industry focus on public health, safety and the environment

### Workshop key discussion points

1. Development of IGA with industry consultation.
2. Plumbing Codes Board includes independent representation
3. Funding from state and federal government
4. National uniformity in regulations and licensing
5. Competence based licence renewal fully supported
6. NPRF review current overseas trade skills assessment process



## Action Plan

Emerging Themes	Discussion point	Action	When
<b>Consumer and Industry Confidence</b>	1. Development of IGA with industry 2. Plumbing Codes Board includes independent representation consultation. 3. Funding from state and federal government 4. National uniformity in regulations and licensing	1. Development of an IGA that established a national coordinating body which oversees the following: <ul style="list-style-type: none"> <li>- minimum necessary performance based codes to achieve health, safety, amenity and sustainability of plumbing systems in buildings;</li> <li>- direction setting to align with strategic priorities as established by Ministers</li> <li>- transparency, accountability and consultation including appropriate impact assessment;</li> <li>- greater national consistency including a variation reduction strategy;</li> <li>- reduced reliance on regulation including increased practitioner skill levels and non-mandatory handbooks;</li> <li>- strengthen reforms to plumbing regulation (through international collaboration);</li> <li>- enhanced labour mobility across the country through an effective and transferable licensing regime; and</li> <li>- improve the auditing and enforcement profile of plumbing product quality in Australia.</li> </ul>	June 2009
	5. Competence based licence renewal fully supported	2. Develop best practice model for competence based licence renewal.	September 2008
	6. NPRF review current overseas trade skills assessment process	3. Progress the setting of minimum standards, methodologies and assessment for reciprocity in countries previously covered by the ANZRA Agreement	Ongoing



## Regulatory Issues

Identified issues:

1. Industry engagement – seat at table and consultation with regulators
2. Compliance and enforcement across jurisdictions – no national consistency
3. Plumbing Code of Australia – might be a national code – not called up yet by states and territories
4. WaterMark – certification process
5. WELS – excellent idea however
  - a. Lacks substance
  - b. Fails marketplace

## Workshop key discussion points

1. Industry engagement with Regulators.
2. National consistency and compliance in plumbing regulations.
3. Public awareness campaign.
4. WaterMark Certification process.
5. Water Efficiency Labelling Scheme.



## Action Plan

Emerging Themes	Discussion point	Action	When
Regulatory Issues	1. Industry engagement with Regulators.	1. Development an NPRF website providing clear, concise and timely information to stakeholders on the activities of the NPRF, issues of importance to plumbing industry stakeholders, and avenues for engagement.	June 2008
	2. National consistency and compliance in plumbing regulations.	2. Review current product approvals and formalise any required amendments to product approval mechanism.	June 2008
	3. Public awareness champion.	3. Develop and consolidate partnerships and alliances with government and industry bodies, specifically ensuring representation on relevant bodies and input in decision making processes.	Ongoing
	4. Water Efficiency Labelling Scheme	4. Representations to relevant state/territory and federal Ministers that the Australian Government act to make the necessary legislative changes to establish WaterMark Certification as a prerequisite for compliance with the Water Efficiency Labelling Standards Scheme.	October 2008
	5. WaterMark Certification process	5. Representations to relevant state/territory and federal Ministers in consultation with industry to request immediate action to progress the implementation of appropriate minimum water efficiency standards for all plumbing products under the WELS Scheme.	July 2008



## Education, Training and Licensing

Identified issues:

1. Harmonisation of licensing
  - a. National licence
  - b. Mutual recognition
2. Consistency in training delivery
  - a. Best practice
  - b. 4-5 streams of training package
  - c. hours of training
  - d. recognition – RPL and MR
3. Continual improvement – aim of increasing capacity within industry
4. Overseas assessment
5. Consultation

### Workshop key discussion points

1. What does industry accept?
  - a. Separate licensing regime out of training outcomes
  - b. Review of mapping documents from all qualifications to new
  - c. Regulators need to address the variance in training hours to align to a common training outcome
  - d. Why do we focus on hours and not completion of competency?
  - e. What is the regulator involvement in AQTF 2007?
  - f. Industry wants 5 streams
  - g. NSW RPL Project needs to be completed



## Action Plan

Emerging Themes	Discussion point	Action	When
Education, Training and Licensing	1. Separate licensing regime out of training outcomes.	1. Continual progression of licensing harmonisation.	Ongoing
	2. Review of mapping documents from all qualifications to new.	2. Review plumbing training package, and develop an assessment framework and final assessment tool for incorporation into the package.	December 2008
	3. Regulator involvement in training package.	3. Establish processes to identify and address training issues	September 2008
	4. Competence based licence renewal.	4. Develop best practice model for competence based licence renewal.	September 2008



## Elements of success to carry forward

- Focus
- Industry direction
- Accountability
- Licence confidence
- Community safety
- Improvement in environmental focus
- High level professionalism
- Strengthening relationships
- Tangible/non tangible benefits for plumbing, trades sector, stakeholders with partners and community
- United NPRF and industry support for the recommendations of the *“Managing the Flow”* report

## Our commitment

1. Moving forward as one innovative, integrated body through a focus on Community, Industry, Innovation and Collaboration to deliver improved governance, technical, educational and licensing standards for the plumbing trade sector.
2. To pro-actively engage industry and provide effective channels for communication and appropriate consultation with stakeholders.
3. The NPRF will ensure that wherever possible plumbing as a distinct industry is represented in decision-making on any national regulatory issue that may impact on the plumbing industry.

# Attachments



## Attachment 1 – Attendees

<b>Name</b>	<b>Organisation</b>
Mr Michael McGuinness	Chairperson – NPRF
Mr Phil Routhan	Chairman - ANZRA
Mr Jeffrey Clark	Chairperson – Technical Advisory Committee, NPRF
Mr Graeme Hunt	Workplace Standards Tasmania (NPRF)
Mr Alan Humphreys	Workplace Standards Tasmania (NPRF- TAC)
Mr Gary Bath	Plumbing Industry Commission (NPRF-LEAC)
Mr Les Barnard	Sydney Water Corporation (NPRF)
Mr Craig Simmons	ACT Planning and Land Authority (NPRF)
Mr Paul Day	ACT Planning and Land Authority (NPRF - TAC)
Mr Geoff O'Reilly	Plumbers Licensing Board WA (NPRF)
Ms Emma Dawe	Department of Water and Energy, NSW (NPRF)
Ms Vanessa Morris	NPRF Secretariat, Plumbers Licensing Board WA
Mr Stuart Henry	
Mr Stephen Movley	The Institute of Plumbing Australia Inc
Mr Murray Thomas	Plumbing Coalition of Australia/ Master Plumbers and Gasfitters Association WA
Mr Adrian Hart	MPMSAA/ MPAQ
Mr Robert Farnham	TAPS – Group Training Company SA
Mr Doug McClusky	Plumbing Trades Employees Union - CEPU
Mr Michael Kefford	
Mr Alan Ross	CPSISC
Mr Fred Baltetsch	Gordon Institute of TAFE
Mr Mark Amos	Dux Manufacturing Ltd
Mr John Gilbert	Standards Australia
Mr Andrew Harper	Standards Australia
Mr Anthony Pascale	Casey Services (Aust) Pty Ltd
Mr Alan Baldwin	Casey Services (Aust) Pty Ltd
Mr Peter Lamborn	Casey Services (Aust) Pty Ltd
Ms Linda Hawkins	Master Plumbers and Gasfitters Association WA
Mr Noel Abercromby	Master Plumbers and Gasfitters Association WA
Ms Carmel Coate	Plumbing Products Industry Group
Mr Michael Peacock	Plumbing Products Industry Group
Mr Peter Flynn	Plumbing Products Industry Group
Mr Alex Shearer	TAFE SA
Mr Ian McGinn	ACT Master Plumbers Association
Mr Richard Thorpe	ACT Master Plumbers Association



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Mr Kerry Apelt	Skills Tech Australia
Mr Gary Cook	Sydney Water Corporation
Mr Stephen Sharp	Sydney Water Corporation
Mr Frank Spinelli	Sydney Water Corporation
Mr Osvaldo Marques	SAI Global
Mr Francisco Henriques	SAI Global
Mr Brad O'Carroll	Building Codes Board, Queensland
Mr Allen Hazell	Building Codes Board, Queensland
Ms Ona Rae	Building Codes Board, Queensland
Mr Russell Fingelton	Building Codes Board, Queensland
Mr Michael Wakefield	TAPS – Group Training Company SA
Mr Will Casey	Plastec Australia
Mr Jeff Patchell	Plumbing Connection Magazine
Mr Jonathan Jackson	Plumbing Connection Magazine
Mr Chris Jones	Plumbers Licensing Board WA
Mr Ivan Marsic	The Australian Gas Association
Mr Paul Trentini	Storm Plastics / Consolidated Alloys
Mr Neil McPherson	OneSteel Piping Systems
Mr Ralph Martin	Storm Plastics
Mr Rick Wickham	Flovac Vacuum Sewerage Systems
Mr Franz Huelle	Rehau Pty Ltd
Mr Richard Hickey	South Western Sydney Institute of TAFE – Miller
Mr Max Garbin	Swan TAFE, WA
Dr Steve Cummings	Caroma Industries