



Australian Wood Panels Association Incorporated

COMMENTS TO PRODUCTIVITY COMMISSION ON DRAFT RESEARCH REPORT:

STANDARDS SETTING AND LABORATORY ACCREDITATION

Introduction

The Australian Wood Panels Association (AWPA) presented a submission to this Research Project on the 19 April 2006, Submission No 12. The main point of our submission was the easy access to Australian markets of imports that make no commitment to Standards, especially in matters of health and safety.

These comments on the Draft Report, relate to this initial focus and also to points raised in the Draft Report concerning Australian Standards committee representation and Australian participation in ISO committees.

Imports and Standards

We raised concerns about imported wood panels that far exceed voluntary standard limits for emission of formaldehyde gas. Formaldehyde has been confirmed by a recent NICNAS PEC study ordered by the Australian Government, as a chemical that must be controlled in the workplace and general environment. The NICNAS PEC Report recommended the use of low formaldehyde emitting wood panel products as specified by Australian Standards. We recommended that the Productivity Commission study take up this issue and advocate a simpler and more transparent process through Standards Australia, for upgrading voluntary standards to mandatory requirements, especially where there are health and safety issues with chemicals which could have adverse affects on workers and the general public.

However, the Draft Report seems to have concluded that there are too many standards now in mandatory regulations or at least, too many requirements of Australian Standards are written into legislation. Obviously, we do not have the wide ranging assessment of this issue that the PC research officers now have, and we concede there must be merit in the points you have made. However, we ask for balance in the presentation and the acknowledgment that while some Standards may be called up in regulation unnecessarily (or all requirements called up when only some are necessary), other standards (or parts thereof) have a good case for regulatory backing.

We ask that your report and recommendations elaborate on alternatives to full call up of standards in regulations. You mention that all requirements of standards are not always necessary in regulations, key sections only may be needed. Other options include requirements that products must state what standards are met, or regulations could require that the product's performance for key properties be stated. In the case of wood panels and our formaldehyde concerns, if imported panels were required to state their formaldehyde emission rating according to a recognized standard, consumers could then made informed choices when buying wood panel products.

Australian Standards Committee Representation

Draft Recommendation 8 covers preparation of standards and several points concern committee representation. You recommend a more rigorous approach to achieving balanced committee membership.

I believe sector boards are already active in this area but there is a problem is inducing nominees to attend meetings. The Wood Panels committee (TM005) has an impressive list of members covering manufacturers, consumers, regulators and researchers. However some nominees never come to meetings and others only occasionally. Availability of travel cost reimbursement may help, but all sectors (private industry, associations and tertiary organizations) have reduced staff compared with years gone by and now just don't have the resources. Telephone conferencing may help, but for large committees (and these measures are designed to increase committee membership) it can be a very difficult process.

Recommendation 8.4 asks for greater use of independent experts in preparing drafts. I doubt if there are any experts who are really independent. In the preparation of product standards, it is usually assumed that researchers are independent and that manufacturers are looking for a production-friendly standard. Generally, this is not the case. I have seen drafts prepared by researchers that covered their area of interest but completely ignored other legitimate product options.

Committee performance is largely determined by the chairperson. Often an independent expert is chosen for this position but they don't necessarily have the skills to run a meeting, especially if there are strongly held but differing views among committee members. A stronger role for Standards Australia management in assessing Chairperson effectiveness and a willingness to change when necessary, would result in better committee performance.

ISO Involvement

The AWPA was instrumental in re-activating two sub-committees of ISO Technical Committee TC89. Positions of chairperson and secretary were sought for Australia and were awarded by ISO, despite considerable pressure from Europe to retain these positions. However, Standards Australia required a substantial sum to accept the secretarial role. This funding was about double the costs of a secretary attending overseas committee meetings. Despite the fact that only one committee meeting is held each year (and no meetings this year), this contribution, plus the cost of supporting the chairperson and Australian delegate to meetings, has placed a heavy burden on the Association to continue this work over the many years required to finalise several standards.

The travel subsidy available from the Australian Government is less than 10% of this total cost and AWPA strongly supports your recommendations for increased funding to promote wider participation. Standards Australia should have sufficient funding to accept a larger number of ISO secretarial appointments and the associated travel costs.

Australia should have wider participation in ISO committee work, both through committee delegates and a wider representation as committee chairs and secretaries.

We thank you for the opportunity to make these additional comments to our original Submission. Dr Alan Halligan is available for further elaboration of the points we have made if required.

On behalf of the Australian Wood Panels Association

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