

Enquiries Dinesha Emmery
Telephone (07) 3225 1366
Your reference
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Environmental Protection Agency
Incorporating the
Queensland Parks and Wildlife Service

12 May 2006

Robert Fitzgerald
Commissioner Productivity
Commission Standards and
Accreditation Study Productivity
Commission PO Box 80
BELCONNEN ACT 2616

Dear Commissioner Fitzgerald

Thank you for providing the opportunity to input into the Productivity Commission research study on Standards and Accreditation. This research study is a review of the Australian Government's relationship with Standards Australia Limited and the National Association of Testing Authorities (NATA), Australia.

The Environmental Protection Agency (EPA) utilises the services of laboratories across Queensland, particularly for water and air quality monitoring. Officers of the EPA have reviewed the Standards and Accreditation Issues paper, and put forward the following preliminary comments (see attachment A).

Should you have any queries in relation to this matter, please contact Ms Lynne Turner, A/Director, Greenhouse Sciences and Environmental Reporting Unit on 07 xxxx xxxx or via email on xxxx.

I trust that this information will be of assistance in the development of the final report. I look forward to hearing from you at the conclusion of this study.

Yours sincerely

(Signed)

James Purtill
Director-General

ATTACHMENT A

1. The efficiency and effectiveness of standards setting and laboratory accreditation services in Australia

It is important to have individual, reputable and recognised accreditation bodies (i.e. Standards Australia and NATA) to ensure that:

- a rigorous framework is used in assessing, approving and implementing standards in Australia. This allows for standards to be of high quality, and is consistent across the nation, regardless of the origin of the request.
- a single mechanism/organisation exists for engaging on issues of national interest at international forums; therefore minimising any duplication of effort and differing views in terms of priority areas at a state/national level.
- standards development reflects the needs of government, industry and community, and restricts the implementation of 'inappropriate' standards across States and the nation.
- laboratories and facilities are of high-quality/competence levels. This is necessary to allow for quality control, inter-laboratory testing and maintaining client confidence in the procedures, techniques and outcomes.

2. The appropriate role for the Australian Government in relation to standard setting and laboratory accreditation

- The Australian Government has a key role in overseeing that 'national interests' are appropriately reflected.
- The costs associated with conducting processes for assessing standards, and for accrediting services can be prohibitive for any single State agency or industry.
- Commercial arrangements can result in a high volume of sales of standards that are not appropriate; and/or the accreditation of facilities/laboratories that have sub-standard levels of competency/integrity. Similarly service provision by multiple, competing private agencies can result in different states having different standards and different levels of quality of facilities, thereby undermining the current level of quality control, and reducing the capacity for comparison, and achieving the desired outcome.

3. The appropriate terms for Memorandum of Understanding between the Australian Government and its agencies and Standards Australia Limited and National Association of Testing Authorities Australia

- Streamlining standards development process to ensure that standards incorporate recent (state, national and international) technological developments/improvements.
- The current voluntary nature of the Standards Australia committee members, and NATA assessors tends to affect the efficiency, timeliness and quality of the standards developed and facilities accredited.
- NATA recognition of NIST-traceable materials is needed.
- Standards Australia in developing and approving standards should be mindful of International Organisation of Standards outputs, and ensure (where possible

and relevant) consistency across these standards. Particularly where ISO is a more appropriate standard to use in certain instances.

- Acceptance of alternative laboratory procedures that differ from Australian Standards (i.e. APHA Standard Methods for Examination of Water and Wastewater). At present the procedures described in Australian Standards is significantly different to that of the APHA, resulting in analytical inconsistencies.
- Currently, NATA registration can prove to be restrictive to small laboratories. The review provides an opportunity to seek alternative fee structures for small-scale laboratories, thereby improving their quality control, analysis and outputs.
- There should be an inclusion in the proficiency testing requirement that real environmental samples be used (not just certified reference materials). Use of real environmental samples can often highlight the deficiencies of analytical procedures of individual laboratories/facilities.
- Introduction of more regular, impromptu auditing of premises may result in improvements in, and continued maintenance of laboratory facilities.
- NATA accredits other quality control activities, such as documentation, sampling procedures, provision of sampling containers, quality control charts etc. This accreditation is of particular importance for the water industry where new water supply sources are considered for use. New sources contain many varied substances, which can restrict its general use. Only a few of these substances have standard procedures for the analytical technique. The clients need reassurance that the result of the analysis is of high-quality despite the absence of a NATA accreditation for the analytical technique.

4. The appropriate means of funding the activities of Standards Australia Limited and the National Association of Testing Authorities, Australia

- Government funding is necessary for the development of standards, which cannot be funded through cost-recovery process due to the small number of organisations using the standard, but are in the interest of the public.
- Government funding is necessary if NATA is to provide laboratory proficiency testing programs for low volume methods (e.g. considerable financial impost for a limited number of organisations conducting ambient air monitoring to fund an effective inter-laboratory proficiency program, compared with methods used extensively by many analytical laboratories).