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Review of Standards and Accreditation

Submission to the Australian Government Productivity Commission

I congratulate the Government and the Commission for undertaking this Review. From my experience and observations, I share the concerns expressed in many of over 100 Submissions so far that the standard-setting process developed and administered by Standards Australia (SA) is seriously flawed.

By way of background, I am a self-funded retiree whose career has been primarily in the construction industry and property development. One of my inventions, which has been nominated for an award by an association of engineers, has clear benefits in terms of product safety, trade measurement requirements, security, and vandalism. It also uncovered particular problems in one of SA's standards, and more general problems with some others. Accordingly I began dealing quite extensively with SA in 2002, and in 2006 I joined one of its Technical Committees to revise the particularly problematic Standard, representing the Australian Consumers Association (ACA).

Because I am currently serving on this Committee, I am reluctant to make specific comments, but I believe it will be helpful for the Commission and in the public interest to confirm in more general terms some of the problems that have emerged:

1. The Committee was very difficult to get (re-)started.
2. Primarily this was due to the make-up of the Committee that had originally drafted the Standard. In particular, it had become dominated by vested industry interests and this of itself is not conducive to having incentive and concern to improve a Standard or necessarily to consider to take into account the new state of the art and community expectations. It has also become more difficult for broader stakeholders such as the ACA and government agencies to participate actively in Committee activities, partly due to the more serious resource constraints they now face.
3. A Committee needs balanced representation to take into account community interests, as well as those of industry.
4. The management of this Committee needs to be more effective and focused. (More broadly, this seems to be another reason why it is difficult for those outside dominant industry groups to become or keep involved in Committee activities.) Following legal advice that the current standard was misleading, and much pressure to achieve broader stakeholder representation, SA did finally reactivate the Committee. However, it first initiated an "Amendment" process that made largely cosmetic changes. Only now has the Committee (with broader representation including myself and more government agencies) moved into a "Revision" process that can address the substantive problems with the existing Standard. The first meeting for Revisions was almost completely sidetracked on a far less pressing issue of little

relevance to most Committee members. After protests, the subsequent meeting turned to the main problem, but the process continues to be painstakingly slow.

5. Voting and other Committee procedures have not been clearly explained to all members.
6. There are also problems with publication of Standards. Although on the Revision Committee, I had to purchase myself the Amended Standard. Then that Standard did not actually include the correct cover, containing even the largely cosmetic Amendment, at least in the hard-copy version purchased. Even the digital version still indicates that the membership of the Committee for the Amendment comprised all members in the original Committee, which drafted the original Standard, yet several declined to participate in that Amendment process.

This is only one example of what appears to me to be a dysfunctional process, set out in summary form. However, it seems clear from the Commission's own prior studies, other reports, and many of the Submissions (ACA, Consumers Federation, Professor Selinger, Dr Aynsley, Dr Nottage, etc) that SA has more pervasive problems regarding stakeholder representation, efficiencies, fair and transparent procedures, and distribution of its Standards. I believe that a semi-private/semi-public organization like SA can play a role, but it needs a comprehensive overhaul that is only likely to come from detailed scrutiny and pressure from the Government through a study like this one.

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