

Study into Standards Setting and Laboratory Accreditation
Productivity Commission
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ADDITIONAL COMMENTS FROM THE NATIONAL MEASUREMENT INSTITUTE ON THE DRAFT REPORT ON STANDARDS SETTING AND LABORATORY ACCREDITATION

These comments from the National Measurement Institute (NMI) are relevant to draft recommendation 13.2 and also provide information relevant to Submission 123 from the South Australian Government.

Draft recommendation 13.2

First, with regard to the recommendation that **future Commonwealth Government grants should only partially fund the costs associated with NATA's involvement in ILAC, APLAC and relevant ISO/IEC committees**, NMI considers that NATA's leadership in both ILAC and APLAC has been an important driver in establishing international mutual recognition arrangements not only among laboratory accreditation bodies but also among national metrology institutes. The consequent increased transparency of international measurement expertise is in direct support of the national interest by (a) providing government with a sound technical platform when entering into inter-governmental trade arrangements and (b) ensuring that accredited Australian firms can rely on an internationally credible measurement system when exporting their goods and services both within the Asia Pacific region and globally. These are long term benefits that will stand Australia and in particular Australian industry, in good stead for as long as Australia continues to provide appropriate representation to and hence plays an active role in key international standards and conformance forums such as ILAC and APLAC.

Without Government funding, NATA members would be expected to support this activity. This is not appropriate and would be resisted by members whose laboratories only serve the domestic market.

Secondly, with regard to the recommendation that **the Australian Government should not underwrite proficiency testing conducted by NATA, or its subsidiary, unless it can be robustly demonstrated that in specifically identified areas such testing is in the public interest and that it is not commercially available**, NMI notes that, in the past, NATA has only been able to provide a comprehensive proficiency testing regime across the broad range of tests and measurements performed by NATA accredited laboratories through funding support from the Commonwealth Government. This Commonwealth support has enabled NATA to conduct proficiency testing in areas of technical complexity where it is not possible to do so on a cost recovery basis. Many of these areas are of considerable national importance.

Proficiency testing in the metrology fields is a case in point and is of particular concern to NMI. There is a high degree of technical complexity in these fields, expensive artefacts and a relatively small number of participants, and yet their

activities are critical to the national measurement infrastructure. NMI considers funding support by the Commonwealth for proficiency testing to be very much in the public interest.

South Australian Submission 123

NMI notes that a submission has been made by the South Australian Government which appears to contain some inaccuracies and misunderstandings with regard to trade measurement.

NMI is responsible for carrying out pattern approval of measuring instruments on behalf of the states and territories and has NATA accreditation for this purpose. Pattern approval is given after machines are tested for their measurement performance under a range of conditions that may be experienced in the market. Measuring instruments in use for trade must be of a pattern approved type. When brought into use, the measuring instruments must be calibrated initially and recalibrated periodically. Calibration of individual measuring instruments may be carried out by the staff of state and territory governments or, as in most cases, by private sector licensees appointed for the purpose.

In order to calibrate standards for their staff or licensees, states and territories use either their own trade measurement laboratories or in one case a private sector laboratory. The laboratories (or their state and territory representatives) are appointed as Verifying Authorities (VAs) for this purpose. A condition of VA appointment is a formal demonstration of technical competence which is established by demonstrating compliance with the requirements of ISO 17025. NATA is used as the assessment body for determining compliance of these facilities with ISO 17025 and, in most cases, the laboratories become accredited formally. Hence VA appointments and NATA accreditation are complementary activities.

The South Australian Government's submission states that 'the presence of both NATA and State trade measurement authorities in the marketplace is apt to confuse traders'. If so, this is a matter for the education of traders, not exclusion of either category of calibration provider because both have legitimate roles. Indeed, it would not be possible to exclude NATA-accredited calibration facilities from the marketplace because this would disadvantage the many industry clients of NATA-accredited laboratories that are not involved in trade measurement.

It should be noted that the NMI itself has NATA accreditation, not only for its pattern approval laboratory but for all of its calibration laboratories. This involves the use of international peer assessors and is undertaken to ensure and demonstrate the integrity of its contribution to the national measurement system. In addition, accreditation by NATA (as an internationally recognised accreditation body) underpins NMI's participation in international mutual recognition arrangements with the national metrology institutes of other economies.