

[Received by email, 26/4/06]

RE STANDARDS AUSTRALIA COMMENTS 23

Productivity Commission

Dear Sir,

My concern relates to having innovative technology that fits no specific standard and the fact there is no procedures in place to fast track the approvals except through existing channels. This cost time not only to my company but other companies like ours, productivity, jobs and innovation that fails to realize because it's too hard. Standards Australia need to foster such innovation and put in place an easier path. As they say Australia is the innovation capital of the world yet only 3% of innovation gets to market, what about the other 97%?

Protectelec has recently gone through this whole process of having a unique technology that didn't fit an existing standard. The process took 3 yrs, which to me from a commercial point of view is way to long, especially trying to protect IP at the same time. Speed to market can be critical were innovation is concerned. I know some of my response will be outside the guidelines of this report but looking back they do play a big part; firstly,

- a) There is no support network in the standard process that can guide people like me through the maize. Lot's valuable time is wasted finding the right person in the right position to make a decision.
- b) John Tucker talks of the role Standards Australia with no reference Department of Fair-trading yet in my situation I was constantly referred back to DFT in the end it was there decision as to what standard our technology would be tested under. There is no clear boundaries defining the two (one is state the other federally funded) add SAI Global to the picture then throw in NATA test lab and then Standard Committees, both governments talk about cutting red tape as a main agenda to help small business cut costs.
- c) John does mention the role of the committees and how valuable they are, but who gave them the power to dictate policy decision's over the rest and even the Government. My worst experiences were when dealing with these committees, there seems to be no accountability. Standard Australia, DFT, SAI and NATA are all accountable for there actions one way or another whether contractually, commercially or ISO 9000 but not the committees.
- d) When a dispute arises with aspects of a draft / standard every one ducks for cover I have raised queries on the validity of certain aspects standards, been referred the relative committee chairperson 2 months later still no reply. I have spent hours preparing submission to find it was sent to the wrong working committee (incidentally with the same draft number as one in NZ, totally different standard) only when I complained was the mistake realised. When the submission finally got

before the correct committee I had to plan to be at an industry function to ask the committee chair how my submission went.

- e) NATA lab I used although “none government “it was, the time taken was too long, the cost too high. They needed constant direction from SAI, who sort direction from SA and in the end I went to DFT on a particular test procedure. This one test alone cost over \$10,000.00, there was an apparent oversight in the testing, we were not given the same grace as other companies, I asked why; DFT said go back to NATA lab ask for retest, lab said not their fault see SAI, they said see SA. The end result is if we wanted a retest we would pay for it.
- f) The above situation highlighted a problem “ What is the relevance of this test” DFT said none SAI said take it up with SA who referred us back the sub committee and I said BS.(would make a great comedy sketch)
- g) On a serious note our technology has Standards Approval finally, there is one new standard being written and amendment of another, to be published late 2006, I made submissions, done presentation to the working committee on having us included in this new standard and the other one. The committee chairperson has verbally told me our technology is included, I read the draft of the new standard and can’t find any reference to our technology so I asked if he could responded in writing stating the clause ect. I’ll keep you posted on that. The amended standard is still up for comment. I can’t see why we should have to fight to be included.
- h) Through my work I have come across committee members who have sat on particular standards and when asked about aspects of that standard, they didn’t have clue or admitted not having fully read the standard. These were industry player and the aspect affected there livelihood. I questioned why waste your time if you don’t have input you want. There seems to be a culture that 1 or 2 committee members drive the committees direct policy, has been evident in my dealings with committees.(you don’t upset so –so). Typically people don’t like change or some thing new that they don’t understand.
- i) Not to mention in our industry we also have to look at local government rules when considering manufacturing a final product for market.

Most of the above needs to look at from my perspective someone trying to get new technology from” Mind to Market” the road is hard enough just surviving let alone cutting the red tape.

I hope this helps
Thank you

Wayne Callen
Managing Director

Protectelec