

STANDARDS AND ACCREDITATION

SUPPLEMENTARY SUBMISSION BY STANDARDS AUSTRALIA:

REVIEW OF SUBMISSIONS TO PRODUCTIVITY COMMISSION

SUBMISSION NO: 2

INDIVIDUAL/ORGANIZATION: E/PROF BEN SELINGER

Page/Clause/Paragraph	Statement	Factual Comment
Page 3, dot point 2	Standards Australia and NATA have always disliked each other but at least that gave us some competition.	The two organizations currently have a very close and cordial relationship.

SUBMISSION NO: 7

**INDIVIDUAL/ORGANIZATION: NEW ZEALAND CONSTRUCTION
INDUSTRY COUNCIL**

Page/Clause/Paragraph	Statement	Factual Comment
Item 4, paragraph 1	Standards Australia income is primarily generated from the sale of standards documents...	Standards Australia principal sources of income are approximately – Investments- 70% C'wealth Grant - 15% Royalty from sale of standards 15%

SUBMISSION NO: 10

**INDIVIDUAL/ORGANIZATION: NORTHERN TERRITORY
GOVERNMENT PATHOLOGY
SERVICE**

Page/Clause/Paragraph	Statement	Factual Comment
Paragraph 26	Experience with Standards Australia is that it is a significantly larger organization. Its documents are reviewed less frequently	SA policy is to review standards on a 5 yearly basis for major standards and ten yearly basis for others. There is a current program in place to review and take action on standards that have exceeded this policy limit.
Paragraph 27	Standards Australia documents are available at significant cost	Standards Australia documents are largely significantly more economical than equivalent international or overseas standards.

SUBMISSION NO: 19**INDIVIDUAL/ORGANIZATION:****MR J A TURNER, BUILDER &
DESIGNER QUEENSLAND**

Page/Clause/Paragraph	Statement	Factual Comment
Page 1, paragraph 5, (point 1)	The Standards are continually changing so if you purchase a standard this year it may well be out of date by the following year due to revisions	Revision of standards normally occurs every 5 years for major standards and ten years for others. Amendments can be published between editions of standards, however these amendments are available for free download.

SUBMISSION NO: 27**INDIVIDUAL/ORGANIZATION:****BIRCHGROVE TECHNOLOGY
MANAGEMENT CONSULTING**

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, Rec. 6	An executive governing or steering committee be formed to direct and review IT standards development work...	This is a role of the existing Communications IT and e-commerce Standards Sector Board
Page 3, Rec.13	Discounts are offered for bulk orders of multiple copies of a single standard	Discounts are offered for bulk purchases of standards. These are matters decided by SAI Global under business agreements determined in 2003.

SUBMISSION NO: 36**INDIVIDUAL/ORGANIZATION:****NATSPEC**

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, paragraph 4	As Standards Australia no longer has need of its commercial arm we assume that the above# does not affect its revenues	Standards Australia receives a royalty for the sale of standards.

"are permitted to reproduce up to 10% of a standard at nil cost"

SUBMISSION NO: 45
INDIVIDUAL/ORGANIZATION: KIDSAFE

Page/Clause/Paragraph	Statement	Factual Comment
Page 6, point 3, a) paragraph 3	The normal outflow of this structure seems to be a focus on input from the technical experts (generally industry members or regulators) to provide solutions and other members review the proposed changes for practical application, consistency	All Committee Members are invited to contribute to the development of a standard. Additionally, when a working group or subcommittee is established to develop a particular document, members are asked to nominate for participation or to suggest appropriate participants. Drafts are available for review by members and their nominating organizations. They are issued for public comment and committee ballot, only on the agreement of the members. This wide-ranging process ensures transparency, balance and the development of standards without bias.

SUBMISSION NO: 46
INDIVIDUAL/ORGANIZATION: ALUMINIUM FOIL INSULATION ASSOCIATION (INC)

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, paragraph 3	Standards Australia is a privately owned organization	Standards Australia is a company limited by guarantee, with 72 members representing groups interested in the development and application of standards and related products and services.

Page 5, paragraph 4	...have in the opinion of AFIA not followed the due standards development processes from the start ensuring rigorous science would prevail while also ensuring transparency and consensus of all outcomes. AFIA feels that the mission here has been to dislodge and discredit the AFIA assumptions and installation guidelines and replace them under Standards Australia developed amendments to AS/NZS 4859.1	<p>The standards development transparency/consensus process has been followed. The postal ballot of the draft amendment has occurred and the negatives vote of AFIA, Consumers Federation of Australia and Wool Interests will be considered at a meeting of the main committee on 26 July 2006. It should be noted that the Australian Foil Insulation Manufacturers Association have voted positive on the draft amendment. The content of the amendment has been developed by a committee with representatives from the following sectors:</p> <ul style="list-style-type: none"> ▪ Consumer and community interests ▪ Industry, professional and Technical Associations ▪ Manufacturers and Suppliers ▪ Regulatory and Controlling Interests ▪ Research and academic organizations ▪ Certification Interests <p>This was set out in the Standards Australia letter to Mr Tikey of the Independent Insulation Manufacturers & Merchants Association of Australia on 25 November 2005.</p>
Page 6, paragraph 1	AFIA has continually outlined these facts to Standards Australia in writing since February 2005 only to be ignored time and time again	SA has responded to letters and emails sent by AFIA and meetings between SA senior management and AFIA have been held. The matter is under consideration by the Building Standards Sector Board.
Page 6, paragraph 2, final sentence	This entire expert sub-committee appeared to fall into disarray in the end with frustration	There was not full agreement within the subcommittee. However the main committee has the role of considering the work of the subcommittee and making the final decision on matters. As noted above, this main committee is due to meet on 26 July 2006.
Page 8, paragraph 1	...we have set out the following five representations which reflect the duplication of association representations and duplication of association representatives	See Annex A

Page 11, point 2 (end of page)	Failure to provide evidence of scientific data to support specific crucial changes made to the draft by the Projects Manager and the Chairman of the BD-058 Committee without the full knowledge and consent of the Committee	The role of the Projects Manager is to provide secretariat services and ensure the standards development process is followed. The role of the Chairman is to Chair the meetings. Their role is not to provide evidence of scientific data.
Page 12, paragraph 1	Failure to complete and get agreement for specific technical components of the proposed amendments to AS/NZS 4859.1 assigned to an expert sub-committee.....	The subcommittee was not able to achieve agreement and thus the main committee made decisions in this regard.
Page 13, final paragraph	AFIA was promised a response within two days of the Board's meeting which was held on Wednesday 5 April 2006. We are still waiting thank you, any wonder are at our wits end!	A response was sent to AFIA on 24 May 2006.

SUBMISSION NO: 50

INDIVIDUAL/ORGANIZATION:

**INFANT AND NURSERY
PRODUCTS ASSOCIATION OF
AUSTRALIA**

Page/Claus e/Paragraph	Statement	Factual Comment
Page 1, paragraph 5, sentence 1	...the current committee structure is not supported with effective infrastructure such as research and project management support and, as a result outcomes are minimal.	Outcomes of a committee are a direct function of the knowledge of its members and their ability to achieve consensus. It is not associated with the supposed lack of research. SA's future operating framework outlined in our April submission will enhance project management infrastructure.

<p>Page 1, paragraph 5, sentence 2</p>	<p>Projects Managers supporting the Standards Committee are generally unable to provide any real management of the committee ...</p>	<p>Projects Managers do manage multiple committees – however they are bound to adhere to Standards Australia's policies to ensure the value of the final standard. When a committee reaches an impasse and cannot reach consensus the Projects Manager has to manage (often delicate) negotiations with various parties to achieve an outcome. The inability of a committee to achieve a consensus is the most common cause of delays. The Projects Manager provides guidance to the committee and manages the attainment of an outcome, whilst adhering to the rules and policies of SA.</p>
<p>Page 2, paragraph 3</p>	<p>Committee meetings often become bogged down in detail and lack strategic focus. A more appropriate process would involve a support structure that was involved in developing detail</p>	<p>Committees can appoint sub-committees or working groups to consider the detail of a project. The Committee makes the final decision and Projects Managers are fully conversant with this process. It is the same structure that is used at international level and at most National Standards Bodies.</p>
<p>Page 2, paragraph 4</p>	<p>The size of committees limits the ability to achieve outcomes in a timely manner. Although it is a strength to have broad representation on standards committees, this representation needs to be reviewed on a regular basis. ...</p>	<p>A fundamental aspect of maintaining a balanced committee is to regularly review its constitution. This is SA policy and Projects Managers are obliged to review committee constitutions on an annual basis.</p>
<p>Page 2, paragraph 5</p>	<p>Standards Development in Australia has focussed on establishing discrete vertical standards.</p>	<p>In terms of consumer safety standards, Standards Australia develops standards that fit the requirements of the community or regulatory agencies. In general these standards fit the vertical model, because this is the requirement placed on Standards Australia. Standards Australia has long argued for a risk based consumer safety system and indeed has made submissions supporting this to the Productivity Commission in the past.</p>

SUBMISSION NO: 52**INDIVIDUAL/ORGANIZATION: DR LUKE NOTTAGE**

Page/Clause/Paragraph	Statement	Factual Comment
Page1, paragraph 1, sentence 4	SA can also act as a defacto regulatory enforcement agency, particularly when it provides services to certify that important standards are being met by firms and other organisations.	SA does not provide certification services
Page 6, paragraph 11	In particular, a new MoU should require SA to monitor, publicly disclose and improve broader stakeholder participation not only in Committees (...) but also in SA governance structures (including consumer and NGO participation, and in its still related listed company SAI Global).	SA no longer holds any shares in SAI Global. However SAI Global is the publisher of Australian Standards.

SUBMISSION NO: 54**INDIVIDUAL/ORGANIZATION: AUSTRALIA WIDE DRAFTING**

Page/Clause/Paragraph	Statement	Factual Comment
Paragraph 2, last sentence	This is the reason why the Building Code of Australia and the Australian Standards should be made public...	BCA and Australian Standards are available for purchase by any interested party and Australian Standards can be accessed at State and Territory Libraries and public libraries in NSW.

SUBMISSION NO: 55
INDIVIDUAL/ORGANIZATION: ALINTA LTD

Page/Clause/Paragraph	Statement	Factual Comment
Page 4, paragraph 3	Alinta has been involved in a number of standard developments including AS4645 Gas Distribution Network Management. This standard took about three years to finalise and such a performance does not meet the first key criteria set out above to “Develop standards in a timely and consultative manner”.	AS 4645 was published in 2005 and sets out the safety responsibilities of gas network operators in the new competitive environment. The joint goals of appropriate consultation and timeliness are closely inter-related. In this case, there was considerable consultation required to establish the working arrangements in this new environment and find solutions that were acceptable to the regulatory authorities that would use this Standard. The Standard also needed to cross-refer to other Standards being revised at the time to deliver a coordinated solution. Much of the three years was the result of stakeholders needing to come to agreement.

SUBMISSION NO: 56
INDIVIDUAL/ORGANIZATION: AMPAC TECHNOLOGIES PTY LTD

Page/Clause/Paragraph	Statement	Factual Comment
Page 8 and elsewhere	Technical barriers are maintained by shifting the perceived necessary local requirements from product standards to installation standards in lieu of the product standard and so on. These are the tricks of the trade and it is very naive of Australia to believe the commitments stated in WTO are going to be blindly accepted by member countries across all industries.	The issues raised are chiefly about the barriers to trade erected by Australia's trading partners, despite their obligations under the WTO Technical Barriers to Trade Agreement. Finding strategies to overcome these tactics is high on Australia's trade policy agenda and Standards Australia works closely with the Government on these matters.

SUBMISSION NO: 58**INDIVIDUAL/ORGANIZATION: ALLAN MAPLE**

Page/Clause/Paragraph	Statement	Factual Comment
Paragraph 3, sentence 1	Unlike many other laws, Australian Standards are not freely available to the public.	Australian Standards are not laws or legislation. Their use is voluntary unless they are mandated by legislation. Australian Standards are available for purchase by any interested party and can be accessed at State and Territory Libraries and public libraries in NSW.

SUBMISSION NO: 59**INDIVIDUAL/ORGANIZATION: AUSTRALIAN GAS ASSOCIATION**

Page/Clause/Paragraph	Statement	Factual Comment
Page 4, point 7, sentence 3	But the role should not include any monopoly over the development, supply or implementation of any national standard	Standards Australia does not have monopoly with regard to standards. Other bodies can be accredited to develop Australian Standards through the Standards Accreditation Board.

SUBMISSION NO: 61**INDIVIDUAL/ORGANIZATION: National Marine Safety Committee Inc**

Page/Clause/Paragraph	Statement	Factual Comment
Second dot point	A revision of AS 4132 has not been undertaken because it is a poor seller	It is difficult to counter anecdotal information. However, SA would state categorically that this does not express the stated and committed policy of SA. Should an event such as this be verified as being sourced from SA staff, it would elucidate an immediate management response, most likely entailing staff counselling and on-going performance management.

SUBMISSION NO: 64
INDIVIDUAL/ORGANIZATION: AEEMA

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, General Concerns, paragraph 1	Because of the diversion of resources to fee-paying agencies, the on-going development and voluntary work ...is suffering" Footnote refers to Australian Greenhouse Office (AGO).	SA has an MoU with AGO, which included provision for funding from AGO to substantially cover the cost of an additional Projects Manager to ensure adequate resources without drawing resources away from other standards work. This was applied to an additional 2- year contract position for SA.

SUBMISSION NO: 67
INDIVIDUAL/ORGANIZATION: PETER HOPE, QLD

Page/Clause/Paragraph	Statement	Factual Comment
Page 4, second major dot point	Standards and accreditation relies a great deal on resources offered through altruistic values and voluntary services of experts at technical committee meetings	Accreditation is not a matter for Standards Australia Technical Committees.
Page 5	All	Comment on this page does not separate certification/accreditation from standards development – it must clearly understood that Standards Australia and its committees do not participate in certification or accreditation to its Standards.

SUBMISSION NO: 68
INDIVIDUAL/ORGANIZATION: AZIMUTH BUILDING DESIGNERS

Page/Clause/Paragraph	Statement	Factual Comment
Section titled RE: Standards Paragraph 1	...The current costs are so exorbitant that most operators can't afford to maintain an up to date set of required standards. Access through the web should be far more accessible and affordable.	Standards Australia documents are generally more economical to purchase than equivalent international or overseas documents. Electronic copies, purchased over the web are generally available at a discount compared with hardcopy.

SUBMISSION NO: 69**INDIVIDUAL/ORGANIZATION:****BUILDING DESIGNERS****ASSOCIATION OF AUSTRALIA**

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, second last paragraph	The association further disagrees that Standards Australia should enjoy its present Government endorsed monopoly situation	Standards Australia does not have monopoly situation with regard to standards, other bodies can be accredited to develop Australian Standards through the Standards Accreditation Board

SUBMISSION NO: 76**INDIVIDUAL/ORGANIZATION:****PROTELEC**

Page/Clause/Paragraph	Statement	Factual Comment
Page 1, paragraph 1 and paragraph 2, point a)	...no procedures in place to fast track the approvals except through exiting (sic) channels... ...John Tucker talks ...with no reference [to] Department of Fair Trading...(one is state the other federally funded)...	This confuses responsibility for a regulatory policy role, which is outside the scope of SA.
Page 2, point g)	...our technology has Standards Approval finally...	“Approval” is incorrect. It has been identified that an electrical safety standard (not a product standard) is relevant to his product and the writer is stating that his product complies with this standard.

SUBMISSION NO: 77**INDIVIDUAL/ORGANIZATION:****CONSUMERS' FEDERATION OF AUSTRALIA**

Page/Clause/Paragraph	Statement	Factual Comment
Page 1, paragraph 2	The CFA was informed that this funding was drawn from the Commonwealth grant-in-aid to Standards Australia, and as such had strict restrictions on its use	Funds to assist consumer representatives come from SA corporate funds, not the Grant In Aid.
Page 3, paragraph 3	SA has developed a wealth of knowledge and expertise in the development of standards. Their Standards Mark is recognised...	Assume they mean the 5 ticks. Not SA Certification Mark – belongs to SAI Global since 2003.

SUBMISSION NO: 85

INDIVIDUAL/ORGANIZATION:

**HOUSING INDUSTRY
ASSOCIATION**

Page/Clause/Paragraph	Statement	Factual Comment
Page 4, third last dot point	all public comment periods, amendments, or new standards should be advertised by Standards Australia	This occurs through the Standards Australia Website and other communications.
Page 4, second last dot point	all drafts for comment, and associated Regulatory Impact Statement (RIS) should be available online free of charge	Nearly all drafts for comment are available online free of charge
Page 6, paragraph 2	In the last decade over 5,000 standards have been published	The majority of these standards are revisions of existing standards.
Page 6, paragraph 7	Standards Australia began as a publicly funded body with the mandate to produce standards for the public benefit. It has now evolved to a private business with Commonwealth Government imprimatur”	Standards Australia is a company limited by guarantee, with 72 members representing groups interested in the development and application of standards and related products and services.
Page 6, final sentence	It is understood that SAI Global, which sells, requires Standards Australia via an MOU to produce or review about 500 standards per year (about 7 percent of stock)	As set out in the Prospectus this is “best endeavours”.
Page 9, paragraph 2	The Taskforce [the Bell Report] recommended that Standards Australia should not develop building standards except at the request of the ABCB	Recommendation 28 of the Bell Report states “...that Standards Australia only become involved in building standards called up by the Australian Building Code at the request of the Australian Building Code and this should be formalised in an agreement between the two bodies”
Page 12, paragraph 3	Increasingly Standards Australia is looking at entering the policy setting arena, as evidenced by the recent Standards Australia ‘white paper’ on sustainability and the formation of associated Standards Australia Committees. Setting policy is the role of governments, not	As set out in the white paper “it is proposed that a co-ordination group be formed to provide advice as to the prioritisation for the committees under their direction”.

	Standards Australia	
--	---------------------	--

SUBMISSION NO: 88

INDIVIDUAL/ORGANIZATION:

SAI GLOBAL

Page/Clause/Paragraph	Statement	Factual Comment
Page 17, paragraph 5	...Funding of activities that are deemed to be in the national interest should continue to be resourced from Standards Australia...	Disagree. Standards Australia cannot afford the estimated \$100m pa costs associated with developing and maintaining Australian Standards. Co-funding and co-resourcing by stakeholders, including governments, is essential to address declining volunteerism and out-dated committee processes.
Page 17, paragraph 7	Standards development should not be subject to a benefit cost analysis given the implicit benefits a standard brings to the community...	Strongly disagree. SA is on the record as implementing improved cost benefit analysis and RIS interface, support and co-operation.

SUBMISSION NO: 90

INDIVIDUAL/ORGANIZATION:

MASTER BUILDERS AUSTRALIA

Page/Clause/Paragraph	Statement	Factual Comment
Page 4, section 4.8	...there are approximately 2,500 construction standards in total. The majority of these have been developed without Government and overall industry representation...	All Standards Australia Technical Committees are constituted with a balance of interests of the parties affected by the standard, and this includes industry and government

SUBMISSION NO: 92

INDIVIDUAL/ORGANIZATION: AUSTRALIAN TOY ASSOCIATION

Page/Clause/Paragraph	Statement	Factual Comment
Page 6, second last paragraph	Standards Australia is required to be self funding in the main. It therefore depends on the sale of standards to generate funds for its operations.	Standards Australia principal sources of income are approximately – Investments- 70% C'wealth Grant - 15% Royalty from sale of standards- 15%
Page 7, paragraph 5	This is in contrast to the current model which allows funding according to the income which may be generated.	Allocation of resource to particular projects is not related to the revenue received from sales of those standards, but assessed using criteria set out in the SA Standardisation Guides.

SUBMISSION NO: 100**INDIVIDUAL/ORGANIZATION:****CONSTRUCTION & MINING
EQUIPMENT INDUSTRY GROUP**

Page/Claus e/Paragraph	Statement	Factual Comment
Page 2, point 1	Australian Standards is funded by the Federal Government and yet membership is limited to those that Standards Australia management wish to select	The funding by the Federal Government represents 15% of Standards Australia's annual revenue. Membership of Standards Australia is set out in Clause 11 of the Constitution, and Standards Australia management has no role to play in this regard. Membership of Technical Committees is a balance of interest of the parties affected by the standard.

SUBMISSION NO: 102**INDIVIDUAL/ORGANIZATION:****THE OFFICE AUSTRALIAN
SAFETY AND COMPENSATION
COUNCIL**

Page/Claus e/Paragraph	Statement	Factual Comment
Pages 5-6	Section titled "Essential Safety Outcomes"	Standards Australia welcomes dialogue with The Office to establish co-operative frameworks on such matters as 'deemed to comply' options built around evolving operating frameworks of OHS regulators and of Standards Australia.

SUBMISSION NO: 103**INDIVIDUAL/ORGANIZATION:****CaSServ**

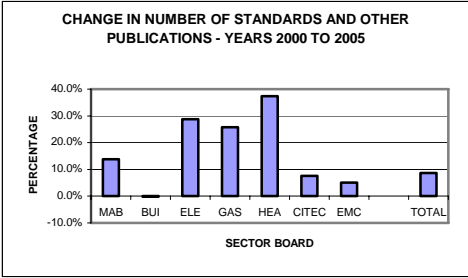
Page/Claus e/Paragraph	Statement	Factual Comment
Page 2, final dot point	Designating JAS-ANZ as the body for the accreditation of developers of "Australian National Standards".	If JAS-ANZ were to assume responsibility for accreditation of Standards Development Organisations (SDOs), it would have to ensure any potential conflicts, as an open advocate of increased certification opportunities, were balanced. It is for the market and the regulators to determine compliance options associated with standards.

Page 6, paragraph 2	...there is a case to be made that Standards Australia, with its current huge invested capital base... should be well enough funded to be cost-effective from its own resources	Disagree. Standards Australia cannot afford the estimated \$100m pa costs associated with developing and maintaining Australian Standards. Co-funding and co-resourcing by stakeholders, including governments, is essential to address declining volunteerism and out-dated committee processes.
---------------------	---	---

SUBMISSION NO: 104

INDIVIDUAL/ORGANIZATION:

AUSTRALIAN INSTITUTE OF REFRIGERATION, AIR CONDITIONING AND HEATING

Page/Clause/Paragraph	Statement	Factual Comment
End Page 1- to Page 2	We note that most of the recent standards seem to suit the “soft” professions such as management, law, occupational safety, IT security etc and that “hard” professions such as engineering or interdisciplinary professions involving engineering with the health sciences may not be receiving adequate attention or resources within Standards Australia	 <p>Key: MAB = Management & Business BUI = Building & Construction ELE = Electrotechnology GAS = Gas HEA = Health CITEC = Communications IT & e-Commerce EMC = Environment Safety & Materials</p>

SUBMISSION NO: 108**INDIVIDUAL/ORGANIZATION:****AUSTRALIAN COUNCIL OF
TRADE UNIONS**

Page/Clause/Paragraph	Statement	Factual Comment
End Page 3 to Page 4	When a stakeholder group like trade unions, who attend to represent the interests of Australian workers (often relating to health and safety aspects of a Standard), are eligible for only one or best two representatives on a development committee and therefore one or two votes, compared to business who hold over a third of the votes, those one or two votes lose all value	The third criteria of the voting rules, that “no major sector interest involved with the subject of the Standard has collectively maintained a negative vote”, addresses this matter. The range of interests that require balance on a Technical Committee far exceed the typical tripartite govt/industry/union interests that predominate in a workplace relations context. For example, importers, exporters, retailers and manufacturers risk being lumped together simplistically as “employers” under models of some ACTU affiliates.

SUBMISSION NO: 110**INDIVIDUAL/ORGANIZATION:****BUILDING PRODUCTS
INNOVATION COUNCIL**

Page/Clause/Paragraph	Statement	Factual Comment
Page 2, paragraph 5	...some industry members feel that Standards rush to publish a Standard as soon as possible, thus driving new sales...	Standards Australia’s principal source of revenue is from investments (70%), with the royalty received from sale of standards only 15% of annual revenues. As from April 2006, Standards Australia does not have any shareholding in SAI Global

SUBMISSION NO: 111**INDIVIDUAL/ORGANIZATION:****AUSTRALIAN COMMUNICATIONS
INDUSTRY FORUM**

Page/Clause/Paragraph	Statement	Factual Comment
Page 5, section 4f	With ACIF being primarily funded through membership, our model is in contrast to that of Standards Australia with their reliance on publication sales.	Standards Australia’s principal sources of income are approximately- Investments- 70% C’wealth Grant - 15% Royalty from sale of standards 15%

SUBMISSION NO: 115**INDIVIDUAL/ORGANIZATION:****CEMENT AND CONCRETE USERS
REVIEW GROUP**

Page/Clause/Paragraph	Statement	Factual Comment
Page 1, paragraph 1 and following	...the absence of conformity requirements in many Aust Stds for strategic products, is putting lives at risk and poses a serious threat to the integrity and longevity of buildings and civil infrastructure.	Assessing whether or not a product meets a standard (commonly known as 'conformity assessment') is a separate issue to the requirements in the Standard itself. Bodies such as JAS-ANZ and NATA have been established specifically to be responsible for a range of valid approaches to conformity assessment that both protect the community and meet Australia's treaty obligations not to erect technical barriers to trade. As indicated in the submission, guidance is provided in many Standards on the roles of these bodies and the conformity assessment options.
Page 3, paragraph 2	Recent Europeans Stds have generally inserted the conformity requirements (ie: the sampling and testing frequency plans) in Part 1 (eg: EN 197), with audit requirements in Part 2 (ie: tasks for the certification body and conformity marks).	Euronorms are drafted in quite a different way to national standards outside Europe because they form part of the European regulatory system. Within the European Union, each member state is required to introduce uniform legislation requiring mandatory certification of products offered for sale against the Euronorms wherever this is specified in the relevant EU Directive. The onus of proof of compliance is thus on the supplier not on the regulator. Such a fundamental shift in Australian law would require agreement between the States and Territories and the Federal Government. Creating something like the European regulatory system has been considered in previous PC Inquiries, for example in relation to consumer product safety, but has not been recommended.

SUBMISSION NO: 121
INDIVIDUAL/ORGANIZATION:

AUSTRALIAN ELECTRICAL AND ELECTRONIC MANUFACTURERS ASSOCIATION (AEEMA) and CONSUMER ELECTRONICS SUPPLIERS ASSOCIATION (CESA): Joint Submission

Page/Clause/Paragraph	Statement	Factual Comment
Page 1, final paragraph	Lack of resources at committee level	AEEMA is represented on 124 technical committees and CESA is represented on 20 technical committees. These 144 main committees would have possibly as many if not more subcommittees and working groups. Standards Australia are implementing a closer monitoring of minute preparation to ensure these small number instances do not occur in the future
Page 2, paragraph 2	Diversion of resources to fee paying stakeholders	As for response to Submission 64, as follows: “SA has an MoU with AGO, which included provision for funding from AGO to substantially cover the cost of an additional Projects Manager to ensure adequate resources without drawing resources away from other standards work. This was applied to an additional 2- year contract position for SA”.

ANNEX A

The balance of Australian interests on Committee BD 058, are as follows:

Consumer and community interests	1
Industry, professional and Technical Associations	2
Manufacturers and Suppliers	7
Regulatory and Controlling Interests	2
Research and academic organizations	3
Certification Interests	1

Representation from within the Australian manufacturer and supplier sector is considered to be as follows:

Aluminium Foil Insulation Association	Foil
Australian Foil Insulation Manufactures Assoc. Insulation Council of Australian New Zealand	Foil Rockwool & Glasswool
Polyester Insulation Manufacturers Association	Polyester
Wool interests	Wool
Australian Cellulose Insulation Manufacturers Assoc.	Cellulose

The balance of New Zealand interests, are as follows:

Manufacturers and Suppliers	2
Regulatory and Controlling Interests	1
Research and academic organizations	1

With regard to the Thermal Insulation Contractors Association of Australia (TICA), Standards Australia raised the matter in a letter dated 20 December 2005 concerning having a representative from a provider of installation services. TICA confirmed the existing representative.

Business New Zealand is an umbrella organization with a wide range of members, which regularly supplies representatives to joint committees. The New Zealand representative is representing insulation interests which are members of Business New Zealand.