

**DRAFT PRODUCTIVITY COMMISSION REPORT: STANDARD SETTING AND LABORATORY ACCREDITATION****Draft Recommendations**

Note: This table only refers to Recommendations related to Standards Australia

<b>Draft Rec.</b>	<b>Recommendation</b>	<b>Standards Australia Response</b>	<b>SA Officer(s)</b>
5.1	The Australian Government should maintain Standards Australia's status as Australia's peak non-government Standards development body and the role of the Standards Accreditation Board in accrediting other standards development organisations to make Australian Standards.	Support.  The role of the Standards Accreditation Board is currently being strengthened. SA has provided advice to the PC on the new governance model in our submission and in the SA Constitution and Membership Rules available via the SA Website at <a href="http://www.standards.org.au/cat.asp?catid=25">http://www.standards.org.au/cat.asp?catid=25</a> .	John Henry
6.1	The Australian Government should, in conjunction with Standards Australia, improve the effectiveness of Australia's participation in international standard-setting fora by more clearly articulating the national interest objectives to be pursued. Australia's future participation must be focused on those international standardisation activities with the potential for the greatest net benefits for the Australian community.	Australian Government through DITR is a member of the ISO & Regional Committee of Standards Australia. The Australian Government is to be added to the IEC Committee (IEC Australian National Committee). Standards Australia will discuss with the Australian Government inviting other agencies such as DFAT to also join these groups.  These two Committees will review the current arrangements with regard to this recommendation, and agree the necessary changes. Standardization Guide (SG) 15 <i>Australian Involvement in International Standardization</i> will be revised and enhanced to more clearly articulate the national interest objectives to be pursued. The SG will then be put out for public comment for two months.	John Henry Warren Miller
6.2	The Australian Government should, in consultation with Standards Australia, ensure the most appropriate expert representation in international standardization activities and increase funding in order to address any financial barriers to such representation.	See above for review of current arrangements  Standards Australia will meet with the Australian Government regarding potential increase in funding and associated implications.	John Tucker John Henry Colin Blair
6.3	Standards Australia should facilitate more direct participation by Australian consumer bodies on the ISO Committee on Consumer Policy and its working groups.	Support. Participation will be managed on advice from the recently formed SA Consumer Standing Forum, with the ISO & Regional Subcommittee being notified in this regard.	Colin Blair

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6.4	<p>The Australian Government should, through the Memorandum of Understanding, continue to require that in the development of Australian Standards there is a presumption in favour of adopting international standards, and that Standards Australia must publish the compelling reasons where an Australian Standard departs from an equivalent international standard.</p> <p>However, the suitability of such standards must continue to be assessed on a case-by-case basis by Standards Australia and by governments through their regulatory impact analysis processes where the standards are to be referenced in regulation.</p>	<p>Support.</p> <p>This Recommendation has implications throughout the Standards Development process.</p> <p>The <u>project initiation stage</u> will be strengthened by inclusion of the results of a search of international standards for the subject area as part of the project proposal form.</p> <p>Where a committee decides not to adopt or follow an international standard, the reasons are to be detailed and forwarded to the relevant Standards Sector Board for approval. This decision must be urgently confirmed by the relevant Standards Sector Board before alternative project development is undertaken.</p> <p>An Australian Standard must advise and identify in its Preface consideration of any relevant international standard that is to be adopted, modified, or superseded by the Australian Standard, including the level of adoption (identical, modified, not equivalent) if applicable.</p>	Colin Blair
7.1	<p>Standards Australia's justification process for the development of new or amended standards and the setting of priorities should be made more transparent and robust including by the publication of reasons for decisions, the establishment of a more open appeals process, and ensuring that the primary decision criterion must be a net benefit to the community as a whole.</p>	<p>Support.</p> <p>Project selection criteria are being developed, as is an appeals process.</p> <p>Standards Australia will develop a section of the website to advise of proposed new projects and update this area to identify action/decisions on these projects. SA will allocate a project team to this task. SA will amend the relevant Standardization Guides to reflect these changes.</p>	Colin Blair Bala Balakrishnan

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7.2	<p>For standards that are to be referenced in regulation, a rigorous impact analysis must be undertaken by governments in compliance with the RIS requirement of the relevant jurisdiction (or COAG requirements for intergovernmental action). In order to best facilitate consideration of other regulatory and non-regulatory alternatives, the RIS must be commenced at the earliest practicable opportunity.</p> <p>While the preparation and co-ordination of the RIS is the responsibility of the regulating government, Standards Australia should provide technical input and other information as required by the drafters of the RIS and where such input is substantial and additional to normal activities, be compensated accordingly.</p>	<p>Standards Australia will assist in this process.</p> <p>Standards Australia has developed a Preliminary Impact Assessment (PIA) document in co-operation with the Australian Building Codes Board for use for standards intended for reference in the Building Code of Australia (BCA). This will be used as a template and pilot on the path to broader roll out across all Australian Standards expected to be referenced in regulation.</p>	Colin Blair
7.3	<p>Consistent with the fundamental principle of transparency and accessibility of legal requirements, the Australian Government, or other relevant governments, should fund Standards Australia to provide low cost access to Australian Standards referenced in regulations.</p> <p>The implementation of this recommendation will require further examination by the Australian Government of the current contractual arrangements between Standards Australia and SAI Global (under which SAI Global holds the exclusive rights to sell Australian Standards).</p>	<p>Standards Australia will discuss this Recommendation with the Australian Government.</p> <p>Note however that many standards are referenced in State and Territory legislation</p>	John Tucker
7.4	<p>Given the cost of access to Australian Standards, the Australian Government, and other governments, should seek to minimise the number of referenced standards and, in particular, avoid unnecessary cross references to Standards which make it necessary to purchase multiple Standards documents.</p>	<p>Standards Australia will amend its processes to ensure greater justification is necessary by committees to include referenced standards.</p> <p>In particular, "Essential References" will be intensely scrutinised and separated from "Further Reading" references.</p>	Colin Blair

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8.1	<p>Standards Australia should improve the balance of interests represented on committees by:</p> <ul style="list-style-type: none"> <li>▪ Increasing the participation of small business, consumer and other community interests;</li> <li>▪ Requiring sector boards to be more rigorous in ensuring appropriate balanced representation on technical committees, including by regular reviews of the composition of such committees;</li> <li>▪ Requiring all committee membership lists to state publicly not only the name of the nominating organisation but also the name of the company or entity from which members come; and</li> <li>▪ Improving complaint handling processes to deal with concerns about the lack of representational balance.</li> </ul>	<p>Standards Australia will analyse barriers to participation by seeking input from bodies such as the Consumer Standing Forum and peak community and special interest groups to identify how these processes may be improved. Appropriate action will be identified and discussed with the SA Board and the Australian Government.</p> <p>Sector Boards review of committee balance will be strengthened, and undertaken at least annually.</p> <p>Standards Australia does not support this Recommendation due to potential for lobbying and threats of litigation against individual Committee members, thus further discouraging participation. SA proposes instead the addition to public information of contact details for the relevant nominating organisation to enable contact by interested parties.</p> <p>Support. An improved complaint handling process is being finalised and will be fully operational by early 2007.</p>	
8.2	<p>Standards Australia should continue to adopt the consensus decision-making model for the development of Australian Standards. Standards Australia should make the standards development process more accessible to the general public, including by:</p> <ul style="list-style-type: none"> <li>▪ Better promotion of public comment opportunities and guaranteeing minimum time periods for consultation; and</li> <li>▪ Making all significant documents and other information readily accessible via the internet.</li> </ul>	<p>Support.</p> <p>SA will enhance public comment opportunities by initiatives such as:</p> <ul style="list-style-type: none"> <li>▪ Enhancing website accessibility;</li> <li>▪ Sending advice on opportunities to comment on draft standards to relevant industry journals.</li> <li>▪ Minimum public comment times will be guaranteed in accordance with SG 1 (2 months for public comment on Australian Standards and 6 weeks for amendment or adoption of international standards)</li> <li>▪ SA will constantly review and upgrade the SA website to enhance ease of use.</li> </ul>	

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8.3	Standards Australia should reduce barriers to volunteer participation on technical committees by adopting measures to reduce the cost of participation. In addition to the same measures necessary to improve efficiency and timeliness (see draft recommendation 8.4), Standards Australia should fund volunteers, particularly small business and consumer representatives not supported by their employers, for travel and accommodation expenses.	Funding is currently provided for travel and accommodation costs for end use consumer participation on technical committees. The financial implications to Standards Australia of extending this funding to small business will be reviewed. Implications of all funding issues will be discussed with the Australian Government. SA is currently testing new ICT tools and virtual committees to ease barriers to participation.	
8.4	Standards Australia must continue to improve the efficiency and timeliness of standards development, including by: <ul style="list-style-type: none"> <li>▪ Making greater use of independent experts to prepare early drafts of Australian Standards;</li> <li>▪ Reducing face-to-face meetings, including through better use of technology;</li> <li>▪ Increased use of partnering arrangements; and</li> <li>▪ Improving project management.</li> </ul>	Support.  Standards Australia is currently re-engineering its standards development process and this will address the matters in this recommendation	Philippa Seagrave Mark Bezzina
8.5	Standards Australia should strengthen its formal appeals and complaints handling processes. Such processes must be robust, transparent and sufficiently independent and cover all grievances relating to any aspect of the standards development process, including appeals against decisions relating to the development of a new or amended standard.	Support.  SA is currently reviewing and upgrading its complaints handling mechanisms.  An independent Appeals Committee is being set up under the Standards Accreditation Board and will be fully operational by early 2007.	John Tucker John Henry
9.1	The Australian Government should continue to support, with some reallocation of funding and possibly at an increased level overall, Australia's participation in international standardisation activities, including: <ul style="list-style-type: none"> <li>▪ Partial funding for SA's membership of, and participation in, ISO and IEC and regional standardization activities;</li> <li>▪ Partial, but increased, funding for industry</li> </ul>	Will be considered with DITR and other (potential) government partners.	John Tucker John Henry

	<p>participation in ISO and IEC meetings;</p> <ul style="list-style-type: none"> <li>▪ Support for involvement in a broader range of specified international for a; and</li> <li>▪ Full funding for participation by consumers in the ISO Committee on Consumer Policy</li> </ul> <p>In addition, support should be provided, through funding or in-kind support, for domestic standardisation activities, including:</p> <ul style="list-style-type: none"> <li>▪ The secretariat of the Standards Accreditation Board;</li> <li>▪ On a case by case basis, development of regulatory standards and input into the preparation of associated regulation impact statements, and</li> <li>▪ Enabling low cost access to regulatory standards.</li> </ul>		
9.2	<p>The Australian Government should continue to use the Memorandum of Understanding (MoU) as the most appropriate instrument for setting the basis for its relationship with Standards Australia. While the terms of the current MoU generally remain appropriate, some changes are necessary including to:</p> <ul style="list-style-type: none"> <li>▪ Give effect to many of the specific draft recommendations in this report;</li> <li>▪ Improve the clarity of the document and its objectives, in particular by better defining public interest activities;</li> <li>▪ Deal with special requirements of regulatory standards; and</li> <li>▪ Require public reporting on an annual basis of its performance against the MoU obligations.</li> </ul>	Standards Australia will work with DITR to improve the document.	