

20 April 2006

Mr Robert Fitzgerald,
Commissioner
Standards & Accreditation Study
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Mr Fitzgerald

STANDARDS & ACCREDITATION

Thank you for the opportunity to meet and also to submit to your office a formal response to the invitation to input to the study on standards and accreditation.

As the peak body for fire safety in Australia, Fire Protection Association Australia (FPA Australia) has a strong involvement in matters of standards setting and accreditation. The reasons for our involvement include:

- FPA Australia has had a Cooperation Agreement for a number of years with Standards Australia (SA) based around our contribution to standards writing and education on matters of fire safety and emergency management.
- Appropriate levels of fire safety for the community and for business are critical to the "public interest", and this is a major objective of our Association.
- International trade in fire safety professional services and in fire protection products is significant and therefore the role that standards setting and accreditation plays is strongly in the 'national interest'.
- FPA Australia and its member organisations make a key substantial contribution to standards setting and accreditation through Standards Australia and NATA, particularly through volunteered time to FP committees at Standards Australia and to the corresponding ISO committees.

In reviewing the PC issues paper dated March 2006 and considering the performance of SA and NATA in standard setting and accreditation, our views would be as follows:

- We agree that the performance of the standards and conformance infrastructure is crucial to the public interest and the national

interest, particularly in terms of public safety in the event of buildings, industrial and bush fire situations.

- We agree such infrastructure is a crucial service to industry by providing the technical basis for orderly commerce, national and international trade, technical harmony between manufacturers and governmental regulatory activities.
- We are very supportive of the current role that NATA plays in relation to laboratory accreditation. We do not see reason for significant change.
- At a technical level, the use of building codes, industry contracts and testing of fire protection equipment relies heavily on the continuing development of state of the art fire protection and emergency management standards.
- We believe strongly in centralised standards writing and accreditation organisations in Australia. We would not be in favour of highly de-centralised and devolved standards writing through many levels of organisations and responsibilities as occurs in the US and other countries, where in fact Australia and its infrastructure are held in very high regard. Such complex, multi-layered systems in some overseas countries are perceived to be costly, particularly by product manufacturers in relation to high costs of conformance with multiple standards and product compliance testing.
- Regarding Government funding for Standards Australia, we believe the current investment results in an excellent return to the community and users of Australian Standards particularly as some 2,400 alone are referenced in government legislation. The “in kind” contribution from the many stakeholders that freely contribute their expertise to the standards development process matches the Government’s contribution many times over.
- As we strive to be more energy efficient and ensure sustainability of our natural resources, our goals in these critical areas of environmental management will be achieved through the support of Australian standards and accreditation processes.

Where we do have concerns, they are minor in relative terms and relate to process and funding, rather than being structural or fundamental. They are:-

- SA lacks some first class, state of the art physical and staff resources in relation to editing and publication which limits the rate at which completed standards get published in a timely cycle of review and updating.
- The appropriate adoption of ISO standards is important as markets are increasingly globalised, and SA must have insufficient funds

from Government to undertake this role fully and effectively, even though this is the clear objective.

- One point FPA Australia has a firm view about is representation in ISO forums, with the Association believing that Australia must be represented by participants who have content matter expertise and thus able to contribute significantly.
- We wish to be assured that SA will continue to have the revenue streams from publication of standards and related activities to ensure its commercial sustainability into the future.

In summary, we are supportive of current infrastructure arrangements on standards setting and accreditation, and the current roles of SA and NATA their outcomes contribute significantly and constructively to everyday life. However, we see some particular areas of process where additional public funding could assist Australia achieve even greater performance in relation to both the public interest and the national interest.

We would be happy to participate in any further dialogue or provide further input to this study as required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ross Hodge', is enclosed in a light grey rectangular box.

Ross Hodge
Executive Director – FPA Australia