

**Australian Consumers' Association Submission**  
to  
**Productivity Commission Review of Australian Government's Relationship**  
with  
**Standards Australia**  
and the  
**National Association of Testing Authorities, Australia.**

***Background***

The Australian Consumers' Association (ACA) is an independent body representing the interests of Australian Consumers, and publishes CHOICE consumer information. ACA also operates a NATA accredited laboratory, a significant user of standards, to support the provision of consumer information and also to carry out public testing to support activities such as appliance energy labelling. ACA is represented on the Council of Standards Australia and participates in a variety of Standards Australia Boards and technical committees in the consumer interest.

***Public and Consumer Interest***

ACA believes very strongly that the consumer interest in key areas of Australia's economy requires the provision of good technical standards to assist or control the supply of key goods and services, particularly those related to consumer safety.

We believe that Standards Australia should retain its pivotal role in the provision of such standards, while also supporting the notion of a broadening of standards writing under an accreditation regime operated by Standards Australia. ACA believes there is scope for innovation in standards development and that bodies external to Standards Australia may offer significant new approaches and processes. At the same time it will be necessary to ensure that business and consumers can be confident that an Australian Standard will meet their expectations for appropriateness and quality.

To ensure that good, effective and where appropriate, enforceable, standards are written to meet the needs of consumers ACA believes that it is necessary for government to provide support in kind and direct funding to Standards Australia and consumer interests so that the required resources and focuses are available to do this work, and in a timely manner.

***Standards Writing and Regulations***

ACA is concerned about the lack of clarity and enforceability in some standards produced by Standards Australia and with the extensive time required to produce important standards. We recommend that Standards Australia adopt new processes for writing and managing standards that retain the key elements of consensus but which allow faster expert input, faster review and deliberation, minimise committee face-to-face meetings to those that are effective and genuinely necessary, and are tasked more clearly to post-writing outcomes (e.g. useability, adoption in regulations).

Some of these important features (other than timeliness) are currently achieved by Standards Australia in important regulatory standards with which we are familiar (e.g. wiring rules, energy labelling) and perhaps also in other such areas. The

experience and benefits of this work needs to be applied more broadly to Standards Australia's work and particularly in key consumer standards.

More resources are needed in the area of sourcing, developing and supporting consumer representatives/experts for technical committees if the consumer input into standards is to be effective and of the necessary quality and timeliness to support the needs of standards writing, as we have set out above.

Also to ensure that appropriate and timely standards are written in the consumer, public and national interests Standards Australia should review and make more rigorous and transparent its decision processes for determining whether new standards work will be undertaken and that clear and achievable outcomes will be delivered once that is done. ACA supports the principle of cost-benefit analysis in this process but believes that benefit needs to be a broad measure, considering a wide range of community benefits, certainly not a narrow sales or direct usage measure.

### ***International Standards***

In the national and consumer interests it is important that the substantial achievements made by Standards Australia engaging in international standards development are continued and enhanced. We should ensure that as much of Australia's resources and activities in this work as possible are directed to influencing international standards outcomes compared to higher level procedural and management involvement – as important and necessary as this activity may be too.

There are at times standards with which Australia has developed world's best practice and we should be seeking to bring the world to this view rather than accepting lesser outcomes in the name of internationalisation.

### ***Laboratory Accreditation***

In regard to the NATA we are of the view that generally it is an effective body and we are aware that it has made significant improvements in the stringency of its laboratory accreditation in recent years. As with Standards Australia ACA is of the view that NATA should enjoy a special position in this regard and would not like to see a return to the competitive registration fiasco we saw in the '90s. Businesses and consumers need certainty with standards and accreditation and neither is well placed to be able to judge the relative merits of competing accreditation or certification schemes, nor should they.

There are ongoing concerns, of importance for ACA and for consumers, with disparities between testing laboratories, in particular regarding consumer product safety testing. This area is a concern for both Standards Australia – clarity, ambiguity and useability of the standards used – and for NATA – the training, skills, knowledge and focus of the testers.

NATA's work, in the region in particular, with organising reciprocal laboratory accreditation recognition is important for Australian businesses and for external businesses seeking to export to Australia. Faster access to our market and others is valuable for competition and hence for consumer choice and quality. Continued government support for NATA's international work is well worthwhile for all interests.