



Department of Consumer  
and Employment Protection  
Government of Western Australia

*EnergySafety*

Productivity Commission  
CANBERRA

## **STANDARDS & ACCREDITATION STUDY**

My office, the *EnergySafety* Division (sometimes referred to as *EnergySafety* WA) of the Department of Consumer and Employment Protection, is the technical and safety regulator for the electricity and gas industries in Western Australia.

*EnergySafety* is a member of the Electrical Regulatory Authorities Council (ERAC) and also the Gas Technical Regulators Committee (GTRC). These national committees have regulator representatives from all AU jurisdictions and NZ, and the comments that follow can be seen as broadly representative of the membership of these two national committees. Like many of the other regulators, my senior staff and I have had considerable contact with Standards Australia over many years, both at Sector Board level, where new areas of standardisation are identified and prioritised, and at Technical Committee level, where the detailed work is done. This is driven by our regulator roles, through which we make extensive use of Australian Standards.

I'd like the Study to recognise the very valuable role played by Standards Australia, not only by managing the process through which technical standards are developed and maintained, but also through the way in which the availability of these national standards (whether for product safety, electrical or gas installation safety, or some other purpose such as defining energy efficiency labelling), some of which are referenced in regulations, facilitates a consistent technical and safety regulatory framework across AU and NZ, which is of great value to industry and governments.

I'd also comment that the standards development process has been reviewed and refined in an ongoing way over the years, and that the time that industry and government committee members can spend on these processes is limited. Any change to the process therefore needs to recognise this limitation. For example, extensive consultation normally takes place between industry, regulator and other (eg consumer) members of a technical committee on the content of a proposed standard, and then follows the public comment phase on the draft standard.

It would therefore be very wasteful in my view, to require the additional work of completing a RIS for every new standard (or new edition, or amendment to a standard) that is likely to have mandatory national application, unless there is some particular reason for doing so.

The other point I'd make is that international standards cannot be simply re-badged as AU standards - sometimes serious reworking is required due to different industry practices in AU for various reasons e.g. the existing IEC "High Voltage Installations" document is currently being reworked by a Technical Committee of Standards Australia, to make it suitable for AU application, and it is a significant task. In other words, we simply cannot rely on the availability of suitable international standards and there really is a need for a national standards body such as Standards Australia.

This concludes my comments, which I trust you will find useful.

*[signed]*

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EXECUTIVE DIRECTOR ENERGY SAFETY**

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