Summary of Submissions

**Alternative Plumbing Solutions in Western Australia**

**Proposal for Western Australia to Adopt the Alternative Plumbing Solutions Enabled through the *Plumbing Code of Australia***

**March 2014**

Contents

[1. Introduction 3](#_Toc382295124)

[2. Overview of submissions 3](#_Toc382295125)

[3. Classes of person to issue technical certificates 3](#_Toc382295126)

[4. Plumbing permits and visibility of alternative solution 4](#_Toc382295127)

[5. Maintaining/amending an alternative solution 4](#_Toc382295128)

[6. Other considerations 4](#_Toc382295129)

# Introduction

The discussion paper ‘Alternative Plumbing Solutions in Western Australia’ was published on 16 January 2014. Feedback on the discussion paper was sought from interested stakeholders, with a closing date for submissions of 21 February 2014. A number of questions were broached in the discussion paper with stakeholders asked to provide feedback by emailing their comments to the Building Commission.

In total, seven submissions were received, comprising three from licensed plumbers, two from industry associations and two from hydraulic services consultants. Another organisation has informed the Building Commission that it intends to tender a late submission.

# Overview of submissions

Adoption of the *Plumbing Code of Australia* and establishment of a process to enable alternative plumbing or drainage installations in Western Australia was widely supported. There was some divergence however on a number of issues including the pre-requisites for someone being considered an expert or to become registered and how an alternative solution installation should be recorded.

Given the small number of submissions, there was no obvious trend in views amongst different groups of stakeholders.

# Classes of person to issue technical certificates

Under the proposal outlined in the discussion paper, a registered class of person to issue technical certificates would be created, with the qualification requirement being that the registered person will:

1. hold an engineering degree, having majored in either hydraulic or civil engineering; and
2. be able to show at least three years’ experience in hydraulic engineering design.

Concern about this proposed approach was stated on a number of levels, including:

1. that the approach is likely to lead to other engineers without hydraulic knowledge approving alternative solutions;
2. there are other qualifications likely to provide expertise in hydraulic systems; and
3. a licensed plumbing contractor should be able to approve simple alternative solutions.

# Plumbing permits and visibility of alternative solution

The discussion paper specifically sought feedback on who should oversee the issuing of plumbing permits (a Plumbing Permit Authority (PPA) who approves a plumbing installation based on alternative solution where the technical certificate is accepted) as well as whether alignments with the building approval process are required.

Preference was generally stated for the PPA to be the Plumbers Licensing Board. However, where an assumption was made that the PPA would also be assessing the technical merits of the alternative solution, a preference for a committee comprising representatives of different organisations was stated.

Views on how plumbing permits should be recorded were highly divergent, and included:

* as an add-on to the current notice of intention;
* included on as constructed diagrams and recorded electronically;
* linked to the building services process; and
* part of the notification to a water services provider.

There was an obvious dislike of the proposal in the discussion paper to physically tag a plumbing installation where an alternative solution has been used. The purpose of this was mainly to ensure that plumbers who are undertaking maintenance or alterations in the future. The majority of submissions showed a preference for the information to either be contained as part of the as constructed diagram or in the buildings Operations and Maintenance manual.

# Maintaining/amending an alternative solution

Generally, it was considered that any special requirements should be included in the buildings Operations and Maintenance manual or that a similar approach should be undertaken for alternative solutions undertaken by Fire Engineers, although no specifics on this arrangement were provided.

# Other considerations

Specific reference to the New South Wales model for administering alternative plumbing or drainage solutions was made in a number of submissions. The NSW is a rather ‘pure’ model in that it leaves the technical regulator (the Plumbing Inspector Assurance Service of the Department of Fair Trading) to determine the merits of the recognised expert on a case-by-case basis. The technical regulator is not required to determine the technical merits of the solution however.