

PLUMBING REVIEW TEAM – BUILDING COMMISSION

RE: ADOPTION OF THE PLUMBING CODE OF AUSTRALIA

Submission on behalf of the ABN Group and Boeing Plumbing.

The ABN Group

Home-grown success story, the Alcock Brown-Neaves Group is proudly Australia's leader in construction, property and finance, with a portfolio of 21 companies across Western Australia and Victoria.

Over the last 30+ years, through our family of private companies, we've built more than 57,000 homes, provided finance for more than 23,000 home owners and have developed commercial and residential projects totalling over \$500 million.

Ranked #3 in the Housing Industry Association's 2013-2014 Housing Top 100 List, the ABN Group is an industry heavyweight with a strong focus on the future of building and an authentic desire to be an active advocate role in the industry.

Under the leadership of founders Garry Brown-Neaves and Dale Alcock, alongside Victoria's Managing Director Aidan Hooper and ABN Group CEO Damien Eves, the ABN Group continues to grow and expand.

Boeing Plumbing

Boeing Plumbing is one of the largest domestic plumbing operations in Western Australia. As part of the ABN Group, WA's leading residential building company, they provide quality plumbing services to more than five industry partners as well as outside commercial, residential and general maintenance work.

Operating throughout the Perth metropolitan as well as Mandurah / Rockingham regions, Boeing Plumbing provides plumbing maintenance, installation and servicing requirements to clients – looking after residential plumbing, commercial, property development and everything in between.

INTRODUCTION

The ABN Group agrees with the proposal to adopt the Plumbing Code of Australia to the extent outlined in the position paper.

This would then enable licenced plumbers to carry out "plumbing works" as defined in the Plumbing Act base on the performance requirements of the Plumbing Code of Australia. Additionally, then, compliance can also be achieved by compliance with an alternative solution.

NOTICE OF INTENTION

Given that the intention of the National Construction Code (which includes volume three being Plumbing Code of Australia) is to only be updated every three years, it is important that the developing and installation of plumbing work, based on an alternative solution, has two pathways which can be followed.

The first is that of "generic solution" which could be used on any job as it is not job specific. In these instances we believe that the formulation of the alternative solution should only need to occur once. Once a generic alternative solution is formulated it should then be approved by the Plumbers Licencing Board and once approval is received it should then not require the lodgement of a special "Notice of Intent", a letter from the owner, and it should then not attract a fee on each subsequent job for which it is used.

The second scenario would be an alternative solution which is job specific, and should follow the same methodology of the NCC parts 1 + 2. That being, that the alternative solution is formulated by a “recognised expert”, certification by watermark or a profession/appropriately qualified person. The alternative solution is then included in the contract documentation and approved by the certifier. The need for lodgement of a notice of intention will only result in further increasing red tape and an additional fee is yet another attack on housing affordability. The ABN Group and Boeing Plumbing pay in excess of \$300,000PA to the Plumbing Licencing Board. It is questionable what value this is to the industry and the buying public.

We recommend that consideration be given to a private certification model rather than the proposed model.

PHASE TWO – CHANGES TO PLUMBERS LICENCING ACT 1995

Given that preparatory work has commenced with the changes to Plumbers Licencing Act 1995, we would like to recommend that the Act includes powers to deal with the anomalies which currently exist between the Plumbing Code, Australian Standards and the WA Health Act 1911 and the plethora of local health laws that exist in WA.

In essence the WA Health Act 1911 and any local health laws should not be able to enforce plumbing requirements with a greater stringency than that of the Plumbing Code of Australia.

By way of example the following items show the inconsistencies that currently exist. The National Plumbing Code does not require a floor waste to be installed to all W/C's, bathrooms and laundries but the Health Act/local laws in WA do. This requirement is not used in other states. Most fixtures now include a standard overflow which would be more than sufficient. We also fail to comprehend why the Health Act would allow overflow waste from a W/C to be piped outside and potential leak/flow into a neighbour's property.

The second such example is the inconsistency of septic requirements where a minister sewer is not available. This should be standardised across all Local Government Authorities with the requirement covered by the Plumbing Code.

Where possible inconsistencies like these mentioned need to be considered at every opportunity with the view to reduce unnecessary red tape. Please do not hesitate to contact us should further information be required.

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