To show it may concern.

Having considered WA government's intention to adopt PCA as compliance standard for plumbing and drainage work in this state, I believe the scope of works covered by the PCA being broader than existing laws! The second key difference I believe is of more concern. That is, the PCA sets performance based standards

My concern which as your article mentions is much less prescriptive about how those standards must be achieved. This is said to be done by setting performance requirements which must be met in order to achieve compliance with the PCA. This is all intended to provide flexibility or innovation in the way plumbing and drainage systems are designed.

This all very well and good but, all commercial contracts usually require hydraulic drawings which are meant to provide the scope and working design for the project and compliance to the standards which the article says now incorporates performance requirements in order to achieve compliance with PCA.

The point I want to make is that this will only work if consultants who have the expertise must certify and take responsibility of the compliance of the drawings.

A second point to make is the licence'd plumbing contractor is not given the contract until site works on the project have been set up and construction has already commenced in most cases in the ground on site. This aspect itself creates another level of compliance difficulty let alone performance based requirements with compliance.

In summary compliance with alternative solutions is all very well but, must be assessed as meeting the performance requirements of the PCA. Again I make the point from a start to finish perspective with regards to design, will only work if consultants certify and are responsible for the drawings.

Kinds Regards
Bruno Martino