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| **PRELIMINARY IMPACT ANALYSIS** | | | |
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| **PROPOSAL:** This proposal seeks to review Australian Standard AS/NZS 3500 Plumbing and Drainage, Part 0 Glossary of terms. This proposal will also include amendments to AS/NZS 3500 Parts 1, 2, 3 and 4 to consolidate definitions contained in other parts of the AS/NZS 3500 suite.  Responsible Technical Committee: Australian Standard Committee WS-014, Plumbing and Drainage | | | |
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| **NCC REFERENCE:**  For revisions or amendments to existing National Construction Code (NCC) referenced documents, provide additional information | **BCA Volume One:**  **BCA Volume Two:**  **PCA Volume Three:** | N/A  N/A  A1.0 Interpreting the NCC | |
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| **PROPONENT:** | Nominating organisation:  Nominating individual:  Position:  Contact email: | | Australian Building Codes Board  Tom Roberts  Director  Tom.Roberts@abcb.gov.au |
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| **DATE OF PIA:**  To differentiate between versions include the document date and/or version number | Date: Jan 2020  Version: 1.0  Status: DRAFT | | |
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| **NATURE AND EXTENT OF THE PROBLEM:** | | | |
| AS/NZS 3500 Plumbing and drainage, Part 0 Glossary of terms is an important document heavily relied upon within the construction industry as one of the few available glossaries of construction terms. This Australian Standard is used not only by the AS/NZS 3500 suite, but Australia’s National Construction Code, New Zealand Building Code and a large number of plumbing product specifications.  The glossary has not been updated since 2003 and during the fifteen years since it was published the main parts of the series have been updated twice, in 2015 and 2018. This has left a number of defined terms being listed within AS/NZS parts 1, 2, 3 and 4 which are not included in part 0, resulting in the misalignment between the parts of the AS/NZS 3500 series.  There are also definitions contained within AS/NZS 3500.0 which are in conflict with definitions contained in the NCC and State and Territory Legislation.  This misalignment has the potential to cause confusion through defined terms not being consistent across all legislative instruments and located in the one place, the glossary, as well as having the potential to create inconsistencies in the meaning of a term if they are defined separately in different parts.  The separation of defined terms may force practitioners simply seeking to find a defined term to purchase numerous parts of the series rather than use AS/NZS 3500.0 as the single source of information. This potential increased financial burden would be removed through the proposed alignment of the AS/NZS 3500 series.  The potential for confusion is also increased by the glossary not being kept up to date with current industry terminology., This risk of confusion is exacerbated through the inclusion of additional sections for new and innovative technologies within the AS/NZS 3500 series such as siphonic stormwater, circulatory heated water systems, vacuum sanitary drainage systems without the key new terms being added to the glossary. | | | |
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| **OBJECTIVES:** | | | |
| The objective of this proposal is to have a single document with clear, up to date definitions for plumbing and construction terms which do not conflict with other definitions contained in either State and Territory legislation, the National Construction Code or individual product or installation standard. | | | |
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| **OPTIONS:** | | | |
| Possible options include the following:  Option 1 – Status Quo  This option would see no change to any documents.  Option 2 – Non-Regulatory Options  There are two possible options for a non-regulatory approach to the problem described above.   * Option 2.1   Non-regulatory options could include the development of guidance within the Standard to assist readers in the interpretation of clauses which may be considered difficult to interpret.   * Option 2.2   The creation of a separate guidance document such as a handbook. This would either see AS/NZS 3500.0 become an informative document or the creation of an additional document with the new or amended definitions.  Option 3 – Revision of AS/NZS 3500.0  The proposed scope of the project seeks to undertake the following:   * Defined terms located in AS/NZS 3500 Parts 1, 2, 3 and 4 be included in AS/NZS 3500.0 and deleted from parts 1, 2, 3 and 4.   Note: where a defined term only applies to a particular part or section of the AS/NZS 3500 series the relocated definition shall state ‘for the purposes of..’ to ensure the definition is not applied inappropriately.   * Existing definitions will be reviewed to see if they need to be amended (or deleted) in the light of new technology or practices. * Defined terms in the Plumbing Code of Australia (PCA) relevant to the AS/NZS 3500 series be duplicated within the PCA and AS/NZS 3500.0. This also captures defined terms used by the WaterMark Certification Scheme. * Defined terms in the Building Codes of Australia (NCC Volumes One and Two) relevant to the AS/NZS 3500 series be duplicated within AS/NZS 3500.0. * Defined terms from AS/NZS 6400 Water Efficient Products, Rating and labelling to be duplicated within AS/NZS 3500.0 to ensure consistency in terminology. * Any additional terms commonly used within AS/NZS 3500 Parts 1, 2, 3, and 4 which a definition would provide greater clarity or remove any ambiguity in the meaning shall be added to AS/NZS 3500.0.   Note: as far as possible new definitions are sourced from an authoritative publication, or where a definition cannot be located, be developed by the WS-014 committee. | | | |
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| **IMPACT ANALYSIS (OF ALL OPTIONS):** | | | |
| Option 1 – Status Quo  Whilst there have not been any considerable issues reported from industry, none of the potential benefits of the proposed change would be achieved and the risks for misinterpretation or confusion from conflicting defined terms would continue, as such there would be no benefits associated with this option. It is anticipated that there would be no costs associated with this option as limited evidence of issues have been indicated.  Option 2 – Non-Regulatory Options  These options would potentially see the potential for misinterpretation of requirements which could lead to non-compliance increase through the creation of a separate location for practitioners to source information to gain an accurate understanding of the intent of the provisions. There would be costs associated with the development of these options and additional costs to industry who would be required to purchase an additional document. It is considered that there would be limited benefits achieved through this option.  Option 3 – Revision of AS/NZS 3500.0  This option is considered to achieve the objectives outlined above. The costs associated with this option include the revision of the standard and that plumbing practitioners would be required to purchase the new standard once published. The impacts, whilst considered to be positive would require industry to become familiar with the new terms, however this is considered to be minimal due to the definitions being consolidated from existing documents such as product specifications. | | | |
| **TRANSITIONAL MEASURES** | | | |
| No transitional measures are considered necessary as the document would be intended to be published in late 2020 or early 2021, however it will not be referenced by the NCC until May 2022 when the NCC is adopted by the States and Territories. This would provide industry with sufficient time to become familiar with the new terms.  New Zealand’s Ministry of Business, Innovation and Employment consider that a transitions period for is not required for New Zealand. | | | |
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| **CONSULTATION:** | | | |
| Direct consultation on the project proposal has occurred with the ABCB’s Plumbing Code Committee and Standards Australia’s WS-014 committee in early 2018 who both provided support for the proposed revision with no additional feedback received.  Note: New Zealand Ministry of Business, Innovation and Employment are observing members of the ABCB’s Plumbing Code Committee and participating members of Standards Australia’s WS-014 committee which also includes a number of industry members from New Zealand.  In May 2019, the Plumbing Code Committee was again consulted to assist the Standards Australia’s WS-014 Committee with the review, requesting input to assist with:   * Identifying any commonly used terms (throughout the AS/NZS 3500 series) where additional definitions would provide greater clarity to users; and * Identifying any existing definitions currently contained within AS/NZS 3500.0:2003 which require review or amendment (including justification).   Public consultation is expected to occur in early 2020. | | | |
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| **CONCLUSION AND RECOMMENDED OPTION:** | | | |
| Option 3 is recommended as it is considered to provide the greatest benefits to industry. Whilst there has been limited evidence of a problem presented to support this change, the minimal costs associated with this option is greatly outweighed by the potential benefits which would be achieved by providing a clear and complete glossary to assist plumbing practitioners in interpreting the requirements of legislation, the NCC as well as product and installation standards. | | | |
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| **IMPLEMENTATION AND REVIEW:** | | | |
| The document is be intended to be published in late 2020 or early 2021, however it will not bereferenced by the NCC until May 2022 when adopted by the States and Territories. This would provide industry with sufficient time to become familiar with the new terms. | | | |
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| **LIST OF ATTACHMENTS:** | | | |
| No supporting documents required. | | | |