



PRELIMINARY IMPACT ANALYSIS

PROPOSAL: This proposal seeks to amend Australian and New Zealand Standard (AS/NZS) 3500 Plumbing and Drainage, Part 1 Water Services to remove the duplicated requirements between the standard and the Plumbing Code of Australia for backflow prevention and contamination control.

Responsible Technical committee: Australian Standard Committee WS-014 Plumbing and Drainage

NCC REFERENCE:	BCA Volume One:	N/A
For revisions or amendments to existing National Construction Code (NCC) referenced documents, provide additional information	BCA Volume Two:	N/A
	PCA Volume Three:	B1.4, B3.3, B4.2, B5.2, B5.3, B5.4, BS 5.1.2, B6.4 B6.5

PROPONENT:	Nominating organisation:	Australian Building Codes Board
	Nominating individual:	Tom Roberts
	Position:	Director
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DATE OF PIA:	Date:	2020
To differentiate between versions include the document date and/or version number	Version:	1.0
	Status:	DRAFT

NATURE AND EXTENT OF THE PROBLEM:

In the 2019 edition of the Plumbing Code of Australia (PCA), a number of the backflow prevention provisions, which were considered matters of public policy, were elevated to the PCA Part B5 Cross Connection Control.

The Protocol for the development of National Construction Code referenced documents (the protocol) states in Clause 5.1 that a NCC referenced document shall not duplicate NCC requirements.

OBJECTIVES:

To remove duplicated requirements between the Plumbing Code of Australia and primary referenced document AS/NZS 3500.1.

OPTIONS:

It is considered that that there are only two options for this proposal:

Option 1 - Status Quo

This option would see no change made to both AS/NZS 3500.1.

Option 2 – Regulatory (proposed) change

To ensure compliance with the protocol it is proposed that the provisions which were elevated to the PCA be removed from AS/NZS 3500.1:2018. There are three primary areas to be considered under this option:

Removal of duplicated provisions

The scope of the project is primarily to remove duplication between the PCA 2019 and AS/NZS 3500.1 2018 due to the addition of Part B5 of the 2019 PCA which sets out the cross connection hazards and the corresponding hazard ratings. Specification B5.1 of the PCA is duplicated in AS/NZS 3500.1 Appendix F, Tables F1, F2, and F3. The provisions are required to be removed from the standard.

Relocation of existing provisions

The information in Appendix F figures F1, F2, F3, F4, F5, F6, and F7 which relates to the installation of Backflow Prevention Devices are required to be relocated to Section 4 to provide a single section on backflow prevention.

Review of existing provisions

Other Parts of AS/NZS 3500.1 Section 4 are to be reviewed and updated where necessary, notably clause 4.4. It is also necessary to improve the clarity of the provisions relating to Cross Connection Hazards and Hazard ratings including Table 4.4.1 and the detail of Figure 4.4.1.

A non-regulatory option is not considered appropriate as any non-regulatory change in this area would be considered to add to the existing problem outlined above, as such is has been discounted as a feasible option within this analysis.

IMPACT ANALYSIS (OF ALL OPTIONS):

An analysis of these two options is outlined below:

Option 1 - Status Quo

This option would see no change made to both the Plumbing Code of Australia and AS/NZS 3500.1. The issues described above would continue occur.

Option 2 – Regulatory (proposed) change

This amendment would remove duplication and any potential confusion for practitioners. The remaining requirements within AS/NZS 3500.1 Appendix F are relocated to AS/NZS 3500.1 Section 4. It is considered that this option will reduce the potential for plumbing practitioners to overlook the guidance material currently contained in the Appendix. This option will result in a single section on backflow prevention, significantly minimising the risk of confusion and enhancing compliance.

The remaining provisions within AS/NZS 3500.1 will be reviewed to ensure that the provisions are up to date with current industry practice and backflow technology.

There are no cost implications for this option and the impacts are considered low as the requirements of the PCA, which are duplicated are considered to overrule those contained within the standard.

It is considered that there will be a positive impact as public health and safety will be enhanced by this proposal which will help ensure that the minimum requirements with regard to Backflow Prevention within the AS/NZS 3500.1 and the Plumbing Code of Australia are met.

There will be a benefit by consolidating all the up to date information into Section 4 which will decrease the risk of non-compliance as the plumber practitioner will not have to refer to different sections and appendices. It is considered that there will be a positive environmental impact. There will be a reduced likelihood of cross contamination of drinking water as a result of improved plumbing practitioner compliance with the backflow prevention provisions on AS/NZS 3500.1 and the Plumbing Code of Australia.

There will also be a benefit as it will reduce the likelihood of cross contamination of drinking water.

TRANSITIONAL MEASURES

Transitional measures are not considered necessary when a new or revised document is to be referenced in the NCC.

CONSULTATION:

Both Standards Australia's WS-014 committee and the ABCB's Plumbing Code Committee have been consulted on this project proposal and have provided support for Option 2.

As AS/NZS 3500.1 is a joint Australian and New Zealand standard, WS-014 representatives from New Zealand have been consulted throughout this project to ensure that the removal of these provisions will not cause any unintended consequences. If any issues are identified they will be resolved between the Australian Building Codes Board and the New Zealand Ministry of Business, Innovation and Employment (in consultation with other key stakeholders).

A draft of AS/NZS 3500.1 will be released for public consultation and members of the Plumbing Code Committee and the general public will be invited to provide comment on the draft. Standards Australia's WS-023 committee will be consulted in the review of this section to ensure that the installation requirements align with the product specifications (AS 2845.1) and the testing requirements (AS 2845.3).

CONCLUSION AND RECOMMENDED OPTION:

Due to the benefits and limited impacts associated with Option 2, this is considered to be the preferred option.

IMPLEMENTATION AND REVIEW:

This option is proposed to be implemented into the National Construction Code through reference in Volume Three in May 2022.

A review of the provisions will occur as outlined in the consultation section of this analysis, however is not proposed for review post publication.

It should be noted that the provisions of Part B5 of the Plumbing Code of Australia are currently under review and will result in changes proposed within the Public Comment Draft of NCC 2022.

LIST OF ATTACHMENTS:

No attachments provided.