



Attn: Bonnie Allan

By email: committee.sen@aph.gov.au

10 May 2018

Dear Ms Allan

Request for corrigendum to the “Australia’s steel industry: forging ahead” report references to ACRS Ltd.

ACRS welcomes and applauds the release in December 2017 of the committee’s report “Australia’s steel industry: forging ahead”. ACRS’ believes this report marks significant progress in the development of reasonable, workable and enforceable compliance requirements for construction products.

We have however been alerted to a serious inaccuracy in the report in reference to ACRS and the product certification scheme ACRS has operated since 2000. Specifically, this is the report’s description of the scope, and therefore the implied effectiveness and benefits, of the ACRS product certification scheme. ACRS believes this error may be detrimental to the construction industry, to government and to the public, as well as to ACRS.

Specifically, the second paragraph of clause 4.23 states that the ACRS product certification scheme

“... seeks to certify compliant structural and reinforcing steel by auditing at the steel mill level. We should clarify that this scheme covers 'mill gate' products and not manufactured or fabricated products.”

This statement is inaccurate. The ACRS scheme certifies not only products at “mill gate” (as it is termed in the report) but also several classes of products manufactured, fabricated, or otherwise transformed downstream from the steel mill. There is also the aspect of materials traceability after the steel mill.



For instance, since 2003 ACRS has certified both the steel mill manufacturing of reinforcing steels to AS/NZS 4671 (“mill gate” in the report) and also the subsequent cutting and bending of that steel by reinforcement suppliers (e.g. processors, or fabricators). Similarly, since 2010 ACRS has certified both steel plate manufactured to AS/NZS 3678 by the steel mill (again “mill gate”) and the subsequent manufacture of structural welded beams from that steel plate by the supplier (e.g. manufacturer or fabricator).

ACRS terms certification of the steel mill (stage 1) and that of the subsequent processing, fabrication or other handling as (stage 2). Whilst a specifier or purchaser may choose to accept only Stage 1 certification, checking both the stage 1 and stage 2 certificates provides a substantially improved risk management of steel performance and documented supply and traceability, and lowers the risk of substitution of inferior materials during the fabrication phase.

Requested corrigendum

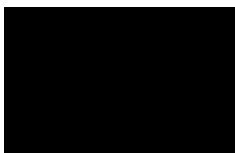
To correct the inaccurate reference to ACRS, we propose that the current second paragraph of clause 4.23 be amended from:

“Steel reinforcing and structural steel product manufactured in or imported into Australia is covered by a compliance scheme managed by the Australasian Certification Authority for Reinforcing and Structural Steels (ACRS). This scheme seeks to certify compliant structural and reinforcing steel by auditing at the steel mill level. We should clarify that this scheme covers 'mill gate' products and not manufactured or fabricated products.¹⁹”

to read:

“Steel reinforcing, prestressing and structural steel product manufactured in, or imported into Australia is covered by a compliance scheme managed by the Australasian Certification Authority for Reinforcing and Structural Steels (ACRS). This scheme provides a two-stage certification system for product supplied both by the steel mill (stage 1), and by the subsequent steel processor, manufacturer or fabricator (stage 2) using the steel to validate the compliance of the product delivered to the end-user. This two-stage system addresses the potential for subsequent processing or fabrication to alter the product such that it becomes noncompliant. A two-stage system provides in addition an effective mechanism to assist product traceability from the point of manufacture.”

Sincerely



Philip Sanders

Executive Director



Appendix

The Australasian Certification Authority for Reinforcing and Structural Steels (“ACRS”) is the peak body of key organisations in Australia and New Zealand committed to the supply of construction steels conforming to the requirements of Australian and New Zealand Standards. ACRS membership (see below) consists of peak industry and professional associations, non-government organisations and government observers who are involved in the planning, design, delivery and use of construction steels in our built environment. ACRS owns, administers and operates an internationally recognised, accredited, voluntary product certification scheme for construction steels, founded upon expert assessment and continual verification. ACRS is a not-for-profit organisation created for the benefit of the wider construction industry and public. ACRS is independent of steel suppliers and steel manufacturers.

ACRS was formed in 2000 based upon the UKCARES¹ system developed in UK during 1980s to ensure manufacture, delivery and use of conforming steels in construction. This system is widely accepted, applied and understood by international manufacturers and suppliers. Full details of the ACRS scheme may be found at www.steelcertification.com, and ACRS’ current scope of JAS-ANZ accreditation at <http://www.jas-anz.com.au/accredited-bodies/organisation/de09bbd6-c9b3-e411-be4f-005056b24e56/schemes-standards?search=all>

ACRS submitted a report to the senate inquiry² in 2015.

ACRS continues to develop its certification of the manufacture, the transformation and the supply of construction steels and associated materials and services to meet the evolving requirements of the Australian and New Zealand markets for compliant products. These developments take into account changes to materials, standards, industry practices, and the scopes and activities of complementary schemes to provide both industry and the public with appropriate levels of technically rigorous and effectively validated certification, in the most cost-effective form available.

ACRS is supported and endorsed by its member companies:

1. Australasian Wire Industry Association (AWIA)
2. Australian Constructors Association (AHCA)
3. Australian Institute of Building (AIB)
4. Australian Institute of Building Surveyors (AIBS)
5. Australian Steel Institute (ASI)
6. Austroads
7. Building Officials Institute of New Zealand (BOINZ)
8. Bureau of Steel Manufacturers of Australia (BOSMA)
9. Concrete Institute of Australia (CIA)
10. Consult Australia (formerly, ACEA)

¹ www.ukcares.co.uk

² [Non-conforming building products Submission 15](#)



11. Engineers, Australia
12. Heavy Engineering Research Association (HERA - NZ)
13. Housing Industry Association (HIA)
14. Master Builders Association (MBA)
15. National Precast Concrete Association Australia (NPCAA)
16. Post Tensioning Institute of Australia (PTIA)
17. Steel Reinforcement Institute of Australia (SRIA)
18. The University of Melbourne
19. Weld Australia (formerly the WTIA)