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Senate inquiry regarding non-conforming building products

Conducted by the Economics Reference Committee

July 14, 2015

Response from Product Presence Pty Limited

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economics.sen@aph.gov.au

Product Presence Pty Limited welcomes the opportunity to provide input into this inquiry, as notified by Housing Industry of Australia [HIA] media release date June 23, 2015 entitled 'Senate Inquiry into Non-conforming Building Products Gets Green Light from Housing Industry'.

Under the terms of reference Product Presence will respond to:

(c), (ii), Independent verification and assessment systems

Our response also supports the following points:

(c), (i), Policing and enforcement of existing regulations and
(c), (iii), Surveillance and screening of imported building products

1. Introduction:

It is understood that a central product registration system (database) would be required to address the problem of non-conforming building products. We recognise this forms a necessary part of the overall terms of reference and supports compliance enforcement.

In our opinion Australia should adopt a similar approach to that of Europe, by way of a structured CE marking scheme for products imported and sold within the Australian marketplace, whereby it is the responsibility of the importer and/or wholesaler to insure that the products sold into the European marketplace meet all safety requirements and standards. Heavy penalties do apply for unsafe non-conforming products.

Product Presence seeks to offer an online product registration system to capture, publish and manage conforming building products for sale into the Australian marketplace. Our system, appropriately named 'CE files' is based on the European CE marking scheme and can be updated to support Australian industry requirements.

2. Outlined below are specific features and functions of the CE files system:

The CE files service is intended to be a searchable online portal, that is mobile device compatible, where product compliance information can be obtained. An independent 3rd party could run the service.

The CE files service makes proof of compliance information easy to understand and easy to find for builders, building certifiers and consumers via a simple and unique product specific web page and accompanying link that can be affixed to the product or packaging, for example:

<http://www.cefiles.com/43753>

<http://www.cefiles.com/43750>

<http://www.cefiles.com/43746>

It is also planned to have product specific information pages accessible via product barcodes. This feature is currently in development.

Each CE files product information page would aim to accommodate and complement existing compliance schemes already operating through various industry groups, such as windows, engineered wood products and steel, for example: <http://www.steelcertification.com/details1.html>

Cross-referencing would be facilitated via the uploading of supporting files or by adding a web link to existing industry information and schemes.

The intention of the online service is to provide a simple, single point of reference for users to find relevant technical information about a building product to show that it meets the minimum requirements under Australian Standards and the Building Code of Australia.

The online service will require the company manufacturing or supplying the product to be approved before allowing that company to put forward individual products for listing.

Each individual product will also require checking and approved prior to publication.

The register will provide information about the product, including testing and certification information and supporting documentation.

Additionally, we suggest that CE files users, are notified when products are found to be faulty or non-compliant.

3. The key features and benefits of the CE files system are:

Instant and direct access to unique product information pages via a web link applied to the product or packaging.

Product specific information pages are expected to cross-reference existing compliance schemes (in development).

Product specific information pages are also expected cross-reference product barcodes (in development).

Online company registration process with approvals controlled at both the company registration and product level.

Product conformity information is linked to a particular product and company.

Facilitates a reduction packaging cost and paper waste via the use of e filing.

Provides access to up to date product data in real time by allowing manufacturers to instantly deploy new documents and updates.

Does not require extensive support due to simplified user interface design. Each product page takes around 5mins for a product owner to create via a simple form, without any web development skills.

Scalable and stable platform that may be expanded over time as customer requirements change.

It is a mobile compatible solution that is available to users 24 hours a day 7 days a week.

4. Further Information:

The solution is currently being developed further after consultation with EU industry bodies; the current system can be viewed at: <http://www.cefiles.com>

Our CE files system would be re-configured and re-deployed to accept Australian industry data as identified by Product Presence.

5. Recommendations:

To serve manufacturers and users, an independent data base solution is needed which meets the following conditions:

Product information pages must be accessible for downloading to any one at any time without registration or the like.

Access to product information pages must be direct and unambiguous.

Product information must be accessible throughout a mandatory period of time after the products were last placed on the market.

Product information that has been published for download must under no circumstances be modified.

Where applicable, additional documents that may be required according to the relevant regulation need to be provided.

6. Further Recommendations:

Implementation of the CE files system that fulfills the requirements set out in points 2 & 3.

Implementation carried out in a staged format, to address the needs of each product type/category.

Implemented system is to include a summary of approved installation arrangements in each product information page.

Implemented system is to include a summary of excluded installation arrangements in each product information page.

7. Closing Statement:

The advantage is obvious: there is one contact point for building product information from multiple manufacturers instead of multiple state or individual contact points. The service would also facilitate trade and further promote supply of safe and compliant products to the building industry.

Yours sincerely,

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