



19th July 2013

Senator Rachel Siewert
Chair
Community Affairs References Committee
Parliament House
CANBERRA ACT 2600

E: community.affairs.sen@aph.gov.au

Dear Senator Siewert

Re: Inquiry into the impacts on health of air quality in Australia

I refer to your letter dated 18 June 2013.

Please find enclosed a submission on behalf of Standards Australia Limited in response.

If you have any further queries in relation to this matter, please do not hesitate to contact me

Yours sincerely

A rectangular area that has been redacted, likely containing a signature or a name.

Colin Blair
Chief Executive Officer

AUSTRALIAN SENATE
INQUIRY INTO THE IMPACTS ON HEALTH OF AIR QUALITY IN AUSTRALIA
STANDARDS AUSTRALIA LIMITED RESPONSE

This submission is made on behalf of Standards Australia Limited (**Standards Australia**) in response to a letter received from the Community Affairs References Committee dated 18 June 2013.

Standards Australia is grateful for the opportunity to respond to the comments made to date in relation to the Australian Senate Inquiry into the Impacts on Health of Air Quality in Australia.

We wish to make a few comments by way of background about the nature and organisation of Standards Australia and the process for developing Australian Standard® brand standards, before commenting on joint Australia/New Zealand Standard AS/NZS 4013:1999 *Domestic solid fuel burning appliances – Method for determination of flue gas emission* and its revision.

BACKGROUND INFORMATION AS TO THE NATURE AND ORGANISATION OF STANDARDS AUSTRALIA

1. Standards Australia is a not-for-profit public company. Standards Australia is recognised as the peak non-government Standards body in Australia through a Memorandum of Understanding with the Commonwealth of Australia.
2. As a company limited by guarantee, Standards Australia has no shareholders. The income and property of Standards Australia is applied solely towards the objects of the Company and no dividend or bonus is payable to any of Standards Australia's Members. Standards Australia's Members include representatives from the Commonwealth and from State Governments, professional, trade and industry associations, consumer organisations, trade unions, research organisations and educational establishments.
3. The Standards Australia Council is responsible for the general oversight of standardisation in Australia and the governance of Standards Australia.

4. Australian Standard® branded standards are developed by Standards Australia and accredited Standards Development Organisations (**SDOs**). Standards Australia develops Australian Standard® brand standards through the use of Technical Committees. A Technical Committee is a balanced and representative group of specific users, industry, government, community and other interested parties. As stated in Standards Australia's Standardisation Guide SG-001, *Preparing Standards (SG-001)*:

The content of a Standard is the responsibility of a Technical Committee (TC). The basis for the composition (or 'constitution') of a TC is to ensure balanced participation by those interests that will be significantly affected by the resulting Standard. Individual members of a TC are selected by Nominating Organisations that may include, but are not restricted to, government bodies, industry associations, community-based and consumer organisations, employee organisations and professional, technical or trade associations.

5. Australian Standard® brand standards are developed as voluntary documents but compliance with those documents may become mandatory where such compliance is prescribed by law (with or without amendment).
6. Further information regarding Standards Australia's processes for developing and revising Australian Standards is set out in the full suite of Standardisation Guides published on Standards Australia's website at:
http://www.standards.org.au/StandardsDevelopment/Developing_Standards/Pages/Standardisation-Guides.aspx.
7. The process used by Standards Australia in developing Australian Standards is set out in SG-001. The fundamental steps within that process are as follows:
- (a) Request for development of a new Australian Standard;
 - (b) Evaluation on national needs, costs and benefits;
 - (c) Approval of new Standards development project;
 - (d) Committee formed;
 - (e) Committee develops draft;
 - (f) Public comment on draft;
 - (g) Consideration of comments;
 - (h) Committee ballot; and
 - (i) Publication.

8. Once the draft Standard is complete and any revisions from the public comment process have been incorporated, the Technical Committee conducts a formal ballot of its members to determine whether to approve the draft Standard. Where a member of the Technical Committee casts a negative vote, the Technical Committee is obliged to give thorough consideration to the reasons for the negative vote and attempt to find a resolution that is acceptable to the Technical Committee as a whole.
9. The Standard will pass the ballot stage once consensus is achieved. Consensus is achieved if:
 - (a) a minimum of 67% of those eligible to vote have voted affirmatively; and
 - (b) a minimum of 80% of votes received are affirmative; and
 - (c) no major interest involved with the subject of the Standard has collectively maintained a negative vote.
10. The requirement for consensus is a central concept in the development of Australian Standard® brand standards, a point that is reinforced in the terms of the Memorandum of Understanding between Standards Australia and the Commonwealth of Australia dated 17 May 2013, which provides that:

'Standards Australia will seek consensus and a fair and acceptable balance of all relevant interests when developing Australian Standards, reflecting not only sound and modern technical practice, but also taking full account of the needs of producers, service providers, users and others who are materially affected.' (clause 6.7)
11. Australian Standards are reviewed from time to time after publication and are updated to take account of developments in research, changes and advancements in community expectations, technical, legal and environmental factors.
12. The time taken to develop a particular Standard may vary considerably depending on a range of factors including the complexity of the subject matter, the role played by individual committee members and the availability of technology relevant to the subject matter of the Standard.
13. In October 2008, following extensive stakeholder consultation, Standards Australia introduced a new business model regarding the development of standards. The new business model took into account the recommendations put forward by the

Productivity Commission in its 2006 review and report and incorporated the following key concepts:

- (a) Net Benefit –all Australian Standards must have an overall positive impact on relevant interest groups (such as suppliers, users and other members of the community) taking into account public health and safety, social and community impact, environmental impact, competition and economic impact;
 - (b) choice of development pathways; and
 - (c) improved processes in order to improve efficiencies and speed to market.
14. “Choice of development pathways” refers to stakeholders choosing one of the available development pathways offered by Standards Australia. Since its initial launch, Standards Australia’s business model has continued to evolve.

DEVELOPMENT AND REVISION OF AUSTRALIAN / NEW ZEALAND STANDARD AS/NZS 4013:1999

15. Australian / New Zealand Standard AS/NZS 4013:1999 *Domestic solid fuel burning appliances – Method for determination of flue gas emission* originated in Australia as AS 4013-1992 and in New Zealand as NZS 7403:1992. It was jointly revised, amalgamated and designated in 1999 as AS/NZS 4013:1999, through the efforts of joint Australian/New Zealand Technical Committee CS-062, Solid Fuel Burning Appliances (**CS-062**).
16. On 5 February 2003 a new project was approved to revise AS/NZS 4013:1999.
17. On 28 November 2003 a draft revised version of AS/NZS 4013 was released for public comment and committee ballot under a combined procedure.
18. On 4 December 2004 a further draft revised version of AS/NZS 4013 was released for public comment.
19. On 27 October 2006 a further draft revised version of AS/NZS 4013 was released for public comment and committee ballot under a combined procedure. The results of that combined procedure indicated that consensus had not been achieved within CS-062. In accordance with Standards Australia’s standardisation guides, CS-062 was then encouraged to give thorough consideration to the

reasons for the negative votes and attempt to find a resolution acceptable to CS-062 as a whole.

20. Despite those efforts, consensus was not reached within CS-062. Committee records indicate that this was due to a range of unresolved matters including matters relating to specifications on emission limits. Accordingly, in July 2007 the project to revise AS/NZS 4013:1999 was placed in abeyance. At that time, the following interests were represented on CS-062:

- Australasian Fire Authorities Council;
- Australian Building Codes Board;
- Australian Chamber of Commerce and Industry;
- Australian Home Heating Association;
- Australian Industry Group;
- Australian Institute of Building Surveyors;
- Australian Lung Foundation;
- Clean Air Society of Australia & New Zealand;
- Consumers' Federation of Australia;
- Department of Environment (Western Australia);
- Department of Environment and Conservation (NSW);
- Department of Primary Industries and Water (Tasmania);
- Department of Environment and Heritage (Commonwealth);
- Environment Canterbury (New Zealand);
- Environment Protection Authority (SA);
- Environment Protection Authority (Victoria);
- Fire Protection Association Australia;
- Ministry for the Environment (New Zealand);
- New Zealand Home Heating Association;
- Pellet Energy Association (Australia);
- Solid Energy New Zealand;
- Testing Interests (Australia);
- Testing Interests (New Zealand);

- University of New England;
 - University of Western Australia.
21. In September 2011, Standards Australia received a new proposal to revise AS/NZS 4013:1999 and on 4 May 2012 a new project was approved by Standards Australia to revise AS/NZS 4013 as a Standards Australia-resourced project.
22. A number of meetings were held culminating on 4 July 2013 when CS-062 met to review the draft form of revised AS/NZS 4013, with a view to settling a draft to be released for public comment. The document remains a draft document, which may be amended over the course of public comment and committee ballot.
23. The interests currently represented on CS-062 are as follows:
- Australasian Fire and Emergency Service Authorities Council;
 - Australian Chamber of Commerce and Industry;
 - Australian Home Heating Association;
 - Australian Industry Group;
 - Bioenergy Association of New Zealand;
 - Clean Air Society of Australia and New Zealand;
 - Consumers' Federation of Australia;
 - CSIRO;
 - Department of Environment and Conservation (Western Australia);
 - Department of Sustainability, Environment, Water, Population and Communities (Commonwealth);
 - Employers and Manufacturers Association (New Zealand);
 - Environment Canterbury (New Zealand);
 - New Zealand Home Heating Association;
 - New South Wales Environment Protection Authority;
 - Testing Interests (Australia); and
 - Testing Interests (New Zealand).

NEXT STEPS

24. The draft revised AS/NZS 4013 is currently being edited, with a view to release for public comment in or around October 2013.

25. Subject to consensus being reached as to the final form of the document, the revised standard is expected to be published as AS/NZS 4013:2014 *Domestic solid fuel burning appliances – Method for determination of flue gas emission* in the first quarter of 2014.

COLIN BLAIR

CHIEF EXECUTIVE OFFICER

STANDARDS AUSTRALIA LIMITED, 19 JULY 2013