



Because public health matters.

12

Since 1901

Our Policies.

What we are fighting for.

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Introduction

About The Master Plumbers and Gasfitters Association of Western Australia

The Master Plumbers and Gasfitters Association of WA (MPGA) is the only industry body in WA dedicated to supporting licensed plumbing and gasfitting contractors.

Although there have been changes to our name over the years, we have existed continuously since 1901. A constant factor through all those decades is our belief that a regulated plumbing industry comprised of properly qualified contractors and tradespeople has a vital role in the protection of the community. This is reflected in our branding strapline, 'Because public health matters'.

We work on behalf of our members to promote their interests and make our industry stronger. Because they are business owners and employers, our activities indirectly help to protect the livelihoods of thousands more people.

Our members work in all industrial sectors and the residential market. They perform a wide range of essential work including the design, maintenance, installation and repair of plumbing, drainage, sewerage, air-conditioning, heating and fire sprinkler systems. Their skilled activities put them at the front line of public health and safety, water conservation and environmental sustainability.

Plumbing and gasfitting contracting business are typically small or medium in size and often family-owned. Most have fewer than 20 employees and compete for business in local areas. They do their work so reliably that most members of the public take for granted the social and economic benefits our industry provides, such as clean drinking water and an environment free of water-borne diseases.

Although training, licensing and the technical standards for products and services are highly regulated to protect the public, the viability of individual businesses is subject to commercial pressures over which they have no control. In many cases, their survival depends on contracts from large private and government enterprises who dictate trading terms, apply pressure to cut costs and withhold payments without valid reasons.

Much of our management team's time and energy goes into lobbying ministers and other decision makers in the WA Government and Australian Government to ensure our industry's needs are heard. In addition, they are actively involved in the development of industry policies and technical standards at state and national levels.

We also take every opportunity to provide the media with the industry's point of view and bring important issues to their attention.

Although we represent signed-up members only, the entire plumbing industry in Western Australia benefits from our activities.

Foreword

The events of 2020 and the uncertain future ahead of us have not caused us to change any of our policies. Instead, they have brought existing policy areas into sharper focus in a way that makes them more relevant.

One example of this was the stark demonstration of the vulnerability of small and medium business to adverse economic forces. This highlighted the value of our policies related to security of payment.

Another example was when members of the public engaged in behaviour such as flushing inappropriate products down their toilets or performing DIY installations of flexible toilet hoses. This behaviour emphasised the ignorance many people have about the public health role of a highly regulated plumbing industry and served as a reminder of the importance of a strong compliance enforcement regime.

Later in the year, the prospect of a path to national recovery created enthusiasm in national and state governments for a uniform national licensing system, something we have been advocating for years. We quickly realised we needed to work fast to prevent such a scheme being introduced in haste without the detailed and careful planning it requires.

We also discovered that the distractions of COVID-19 provided governments with opportunities to attempt to quietly introduce new legislation in areas such as industrial relations and security of payment. These proposed new laws suited their political agendas but would severely disadvantage our members.

While all this was happening, our industry – in company with others – experienced a downturn in business, job losses, supply chain shortages, increased contractual and legal risks and reduced productivity because of social distancing and workplace health requirements.

When we approach government ministers and other policy makers on behalf of our members, we are competing for their attention against every other sector of the economy. While this has always been the case, COVID-19 has increased the intensity of the competition and reduced the odds of success.

We will only be heard if we have a cohesive and constructive set of policies that bring benefits to the wider community as well as our members. We believe that is what we have created with this document.

Explanatory Note

We use the term 'plumbing' as a general term to cover all the disciplines in the plumbing and gasfitting industry, including water supply plumbing, sanitary plumbing, drainage plumbing, fire sprinkler plumbing, mechanical services, roof plumbing and gasfitting.



Summary of Policies.

Summary of Policies

Security of Payment

POLICY 1 Australia needs national building and construction industry legislation that requires mandatory trust accounts for progress payments to subcontractors and the WA Government should be moving in this direction with State legislation. The legislation must make it mandatory for any organisation receiving money that is meant to flow to contractors and sub-contractors further down the project chain to preserve it in a trust account.

Plumbing in Old Residential Buildings

POLICY 2 When insurance companies are calculating their premiums for residential buildings, they should factor in the age and quality of plumbing. Owners who ensure their building's plumbing is compliant with standards should be rewarded with a lower insurance premium.

POLICY 3 A plumbing audit that assesses safety, standards compliance and water efficiency, and provides advice about recommended solutions and costs, should be conducted prior to the purchase or rental of any residential property. The audit should be performed by a licensed plumbing contractor using an industry-standard checklist.

Workplace Health and Safety

POLICY 4 We work with our members to promote workplace health and safety, with the ultimate goal of eliminating all workplace-related death, injury or illness. We aim to do this in a collaborative partnership with the WA Government and call upon the Government to develop educational tools and strategies that will work alongside the legislation to build an ingrained 'safety first' culture among business owners.

POLICY 5 Although all states and territories require all buildings constructed before certain dates to have an asbestos register, this does not go far enough. We want the WA Government to establish a central register of homes and other buildings with known asbestos products and believe all other state and territory governments should do likewise.

Workplace Relations

POLICY 6 Mutually beneficial contract arrangements, with an in-built safety net, should be reached between employees and the employer.

POLICY 7 The Unfair Contracts Legislation should be changed to increase the number of employees in the definition of a small business from 20 to 100, and to increase the upfront price payable threshold from \$300,000 to \$3 million for contracts that last up to 12 months, and from \$1 million to \$9 million for contracts longer than 12 months.

Small Business

POLICY 8 New legislation that affects businesses should include sunset provisions.

POLICY 9 Government should pay the administrative costs of superannuation and other government legislated programs.

POLICY 10 The compulsory superannuation contribution of 12 per cent is unsustainable and should be capped at 10 per cent.

POLICY 11 The Australian Government's commitment to reduce company tax for base rate entities to 25 per cent by 2021-2022 is a positive development for licensed plumbing contractors.

POLICY 12 The Australian Government, the WA Government and the governments of other states and territories should have a national discussion about a timetable to harmonise payroll tax regimes and a long-term plan for its eventual phasing out.

POLICY 13 The reporting schedules for BAS, PAYG, FBT, WGEA and others should be reviewed and aligned to reduce the administrative burden on businesses.

POLICY 14 The Australian Government should pay a wage subsidy to employers who employ adult apprentices. The subsidy should match the difference between the hourly rate of a junior apprentice and the hourly rate of an adult apprentice across each year of the apprenticeship. We call on the WA Government to support this policy in the interests of Western Australian training and employment.

Summary of Policies

Standards and Product Safety

POLICY 15 Australia needs a standard method of taking samples of drinking water when testing whether the levels of metals in the water comply with the Australian Drinking Water Guidelines. The aim should be to replicate, as closely as possible, the way people will consume water over the course of a day at the site concerned.

POLICY 16 Australia should follow Canada and the USA and reduce the allowed level of lead in brass plumbing fittings to 0.25%.

POLICY 17 WaterMark certification should be mandatory for all plumbing products imported, sold or installed in Western Australia, if they are in categories that require certification.

POLICY 18 It should be illegal to import non-WaterMark certified products if they are in categories that require certification. We want the WA Government to follow the lead of Queensland's non-conforming building products legislation, which addresses this problem.

POLICY 19 WaterMark compliance should be mandatory at the point of sale. Western Australia needs a point-of-sale compliance regime that includes prominent WaterMark labelling and consumer information equivalent to the labelling and consumer information required under the Water Efficiency Labelling Scheme (WELS).

POLICY 20 WaterMark certification of prefabricated units should not occur at the point of installation.

POLICY 21 WaterMark certification of prefabricated units should occur at the point of construction. The certification should be mandatory and should be carried out by a licensed plumber. Queensland already has this requirement and Western Australia should follow their lead.

POLICY 22 Western Australia and all other jurisdictions should have compulsory Legionella testing and risk assessments in aged and health care facilities, early childhood centres, schools and nursing homes. Licensed plumbers with approved Legionella training should perform the skilled work of collecting water samples and performing risk assessments. Tempering devices should also be tested every 12 months.

POLICY 23 Standards Australia should reimburse Master Plumbers Australia and New Zealand for all travel and accommodation costs related to reviewing AS/NZS Standards.

Training, Licensing and Careers

POLICY 24 Remote Aboriginal communities should have regular scheduled inspections and maintenance to ensure their plumbing infrastructure is compliant with legislation and works properly. This practical step will reduce the incidence of water-borne diseases in communities.

POLICY 25 Plumbing apprenticeships should allow for a more flexible training structure that encourages young people from Aboriginal communities to become qualified plumbers.

POLICY 26 The WA Government should ensure employers comply with Aboriginal employment targets, including the employment of apprentices.

POLICY 27 The Certificate III in Plumbing course should include a final training and assessment unit that apprentice plumbers must pass before applying for their licences. This unit should revise all the theoretical and practical training apprentices receive during the Certificate III in Plumbing course. To avoid biased assessments, the role of delivering the unit and evaluating the competency of apprentices must belong to an independent industry body.

POLICY 28 The Certificate III in Plumbing course should include a reporting system that requires RTOs to provide employers with reports about how their apprentices are progressing. There should be a report after each block of training and an annual summary report. All reports should include comments about both attitude and ability.

POLICY 29 Licensing bodies in all jurisdictions should introduce additional units of competency in the Certificate IV in Plumbing and Services course. This additional training should focus on commercial skills and the risks and responsibilities involved in running a business and being an employer.

POLICY 30 After gaining the Certificate III in Plumbing, a licensed plumber should have to build their overall level of competence by completing at least three years on-the-job work experience before being eligible to apply for the Certificate IV in Plumbing and Services course.

POLICY 31 We want all states and territories in Australia to have consistent requirements for the training and licensing of plumbing tradespeople, plumbing contractors and hydraulic consultants. This should include all states and territories following the lead of Victoria and requiring specific licenses for stormwater and roofing work. Along with consistent licensing requirements in all jurisdictions, we want to see a national licensing scheme like the National Driver Licence Scheme with standard definitions and licence types.

POLICY 32 Licensing of plumbing contractors in Australia should be tied to a mandatory, nationally recognised continuing professional development program, as recommended in the Building Confidence report. The WA Government should support this by introducing a state-based program as a first step on the path to a national program.

POLICY 33 Licenced plumbing contractors should not be held responsible for verifying complex solutions. Australia needs a defined training pathway to a hydraulic consulting qualification. The foundation of this pathway should be the existing broad apprentice training (with 57 units of competence), plumbing tradesperson's licence and plumbing contractor's licence. The final stage should be a hydraulic consulting diploma course, developed and implemented in consultation with the industry.

POLICY 34 Australia needs a nationally accredited carbon monoxide training course for plumbers and gasfitters. This training should be part of the Certificate III in Plumbing course for apprentices and be mandatory additional training for licensed plumbers and gasfitters and licensed plumbing contractors.

POLICY 35 Western Australia needs a Government-funded campaign to make consumers aware of the risks of carbon monoxide poisoning and why gas heaters should be regularly tested.

POLICY 36 The Plumbers Licensing Board must prioritise chasing illegal plumbing instead of unimportant paperwork slip-ups.

POLICY 37 The Plumbers Licensing Board should act against the illegal practice of licensed plumbers lending their licences to others.



Security of Payment.

Security of Payment

Background

When things go wrong on a construction project, it is common for contractors and sub-contractors to work on unfavourable terms, put up with overdue payment or never be paid at all. As a result, hundreds of construction businesses go out of business every year. This is an unacceptable situation with far-reaching consequences in an industry that directly employs one out of every 10 Australian workers.

States and territories have inconsistent approaches to solving the problem of payment defaults, including defaults that occur when a company owing money goes out of business.

Licensed plumbing contractors may fall to the bottom of the chain. They are typically small businesses, very often family-owned, and become financially stressed when cash flow is interrupted. In the worst cases, a contractor higher up the chain avoids paying by declaring insolvency and going out of business, often to start up again after 'phoenixing' into a new entity.

In May 2018, the Review of Security of Payment Laws report by John Murray (the Murray Report) made a number of recommendations and called for the Australian Government to implement national reform. Some progress has been made but much more needs to be done.

In 2020, the WA Government introduced the Building and Construction Industry (Security of Payment) Bill 2020 (WA). If adopted, it will bring in many of the recommendations in the 2018 Fiocco Report while breaking a key promise to introduce mandatory trust accounts for progress payments to subcontractors.

Issues and Policies

Trust accounts and progress payments

Contractors, sub-contractors and suppliers are vulnerable to the risk of delayed payment or non-payment for goods and services they have supplied. Because payments 'cascade' down from the head contractor, those at the end of the chain are most at risk.

POLICY 1 Australia needs national building and construction industry legislation that requires mandatory trust accounts for progress payments to subcontractors and the WA Government should be moving in this direction with State legislation. The legislation must make it mandatory for any organisation receiving money that is meant to flow to contractors and sub-contractors further down the project chain to preserve it in a trust account.



Plumbing in Old Residential Buildings.

Plumbing in Old Residential Buildings

Background

Western Australia, like other states and territories, has many ageing houses with plumbing that requires maintenance or replacement. Old plumbing may not comply with the Plumbing Code of Australia and, if seriously degraded, may be about to fail.

This sub-standard, ageing plumbing may cause expensive property damage or present a health and safety risk to the occupants. Some examples are frayed flexible hoses that may burst and create a flood inside a house, faulty pressure relief valves that may cause water heaters to explode and illegal cross connection of sewer and stormwater drains.

In addition, when plumbing is old or badly maintained, there are likely to be issues with leaks and inefficiencies that result in wasteful water consumption.

In common with other states and territories except Queensland, WA lacks any legislation that requires property owners other than landlords of rented properties to maintain their plumbing and drainage.

Issues and Policies

Insurance Premiums

Currently, homeowners have no financial incentive to replace old plumbing or ensure their plumbing is properly maintained. The older the plumbing, the greater the risk of corrosion or leaking pipes that can cause damage resulting in an insurance claim.

If insurance companies factored this risk into their calculations and charged higher premiums for houses with old or badly maintained plumbing, owners would have an incentive to ensure their plumbing meets current standards.

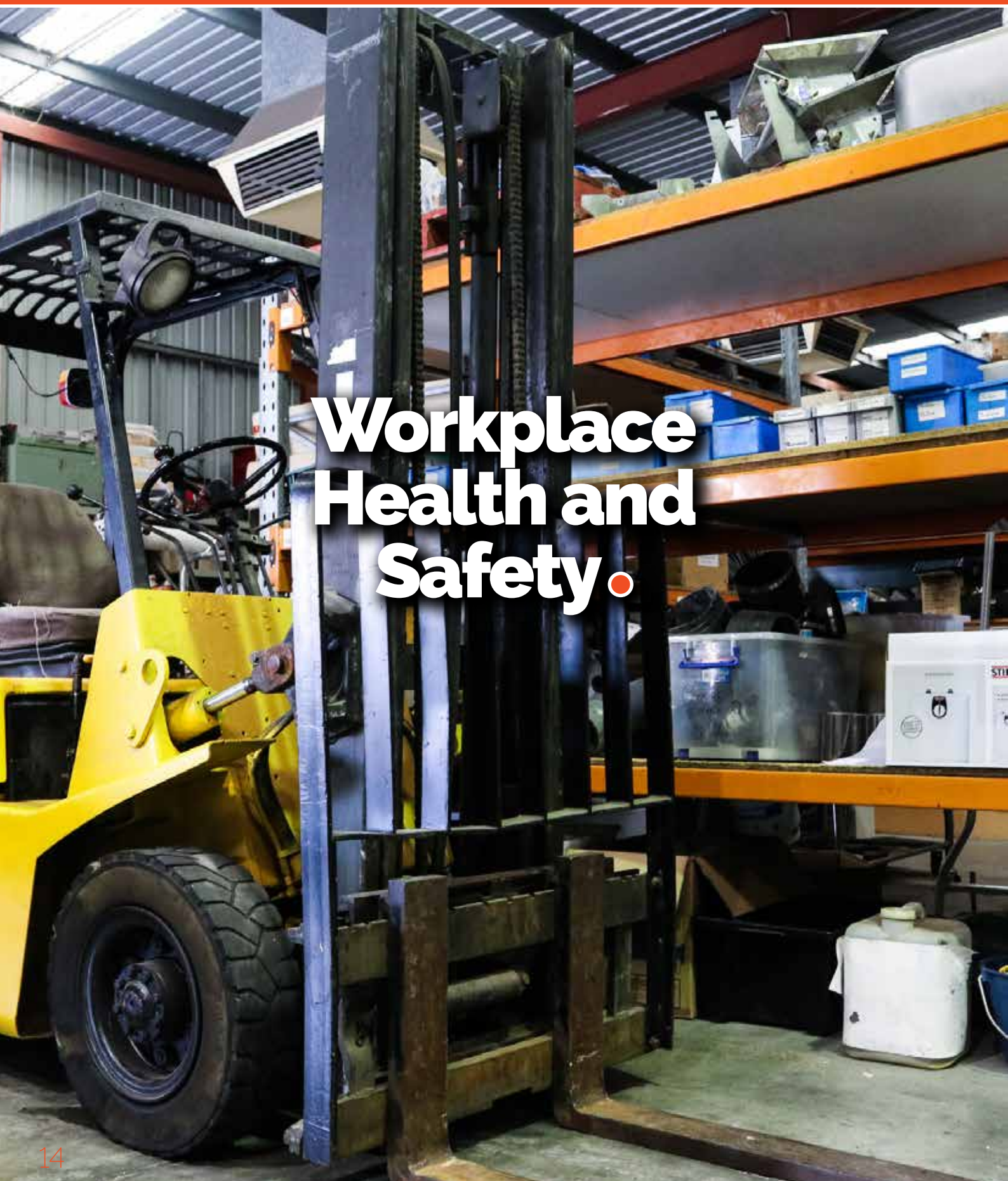
POLICY 2 When insurance companies are calculating their premiums for residential buildings, they should factor in the age and quality of plumbing. Owners who ensure their building's plumbing is compliant with standards should be rewarded with a lower insurance premium.

Home Plumbing Audits

Old or badly maintained plumbing is not easily identified by non-plumbers but is responsible for problems that affect homeowners and renters. Unless rectified, the consequences may include expensive property damage, personal health and safety risks and excessive water consumption.

Currently, there is no requirement for a plumbing audit to identify such problems prior to home purchase or rental. This is a service that licensed plumbing contractors could provide, preferably using a standard checklist that the plumbing and gasfitting industry across Australia has endorsed.

POLICY 3 A plumbing audit that assesses safety, standards compliance and water efficiency, and provides advice about recommended solutions and costs, should be conducted prior to the purchase or rental of any residential property. The audit should be performed by a licensed plumbing contractor using an industry-standard checklist.



Workplace Health and Safety.

Workplace Health and Safety

Background

We regard Workplace Health and Safety as the number one priority in all types of plumbing work. Licensed plumbing contractors and their staff are exposed to a range of health and safety hazards. They may work in hazardous environments on construction sites, operate potentially dangerous equipment or come into contact with toxic materials or contaminated water.

Issues and Policies

Facilitating Compliance with Workplace Health and Safety Legislation

In keeping with our position that workplace health and safety is the number one priority for our members – as it should be for all business owners in every industry – we are proactive in our efforts to ensure they fully understand and comply with all the relevant legislation. While there is much we can do to educate our members, we believe the WA Government should reach out to business owners in a non-punitive approach to educate them about their responsibilities and make the legislation easy to understand.

POLICY 4 We work with our members to promote workplace health and safety, with the ultimate goal of eliminating all workplace-related death, injury or illness. We aim to do this in a collaborative partnership with the WA Government and call upon the Government to develop educational tools and strategies that will work alongside the legislation to build an ingrained 'safety first' culture among business owners.

Asbestos Registers

Plumbers can be exposed to asbestos in older homes and commercial buildings, typically those built or renovated before 1990. There may be asbestos in lagging, sewer vents, flue pipes, roofing materials, gutters and loose-fill home insulation.

If inhaled, particles from broken or disturbed asbestos products can cause serious diseases including lung cancer, mesothelioma and asbestosis.

The occupants of any building with asbestos products are also at risk.

If state and territory governments maintained mandatory central registers of buildings where asbestos products have been found, plumbers could get information about the risks before entering a property.

POLICY 5 Although all states and territories require all buildings constructed before certain dates to have an asbestos register, this does not go far enough. We want the WA Government to establish a central register of homes and other buildings with known asbestos products and believe all other state and territory governments should do likewise.



Workplace Relations ●

Workplace Relations

Background

MPGA wants a workplace system that is fair to both the employee and employer

We support the introduction of a framework that seeks to:

- Deliver greater flexibility and efficiency
- Promote labour market reform
- Provides freedom of choice for employers and employees
- Preserve the rights and role of independent contractors

Employers and employees should be free to enter into mutually beneficial and fair arrangements that fit the circumstances of the business and employees while maintaining the protection of a safety net.

MPGA strongly supports changes to workplace relations legislation that deliver greater flexibility for businesses within our industry allowing them to hire, train, retain and dismiss staff as necessary.

MPGA was a long-term advocate for the reinstatement of the Australian Building and Construction Commission (ABCC) and the Registered Organisations Act (RO Act). Now the ABCC and RO Act have commenced operations, we believe a more productive workplace, in conjunction with fewer lost working days, stronger compliance with legislation and a return to the rule of law will come into play across Australian construction sites.

Issues and Policies

Flexible Workplace Agreements

Mutually beneficial agreements should be reached between employers and employees to fit the circumstances of the workplace and the economic health of the sector. In many instances, collective arrangements have become too inflexible and have failed to meet the needs of businesses or individual employees.

These agreements would be conducted under the protection and benefit of a no-disadvantage safety net for the employee and allow for wage increases tied to productivity bargaining gains to be negotiated one-on-one, rather than through collective bargaining.

POLICY 6 Mutually beneficial contract arrangements, with an in-built safety net, should be reached between employees and the employer.

Unfair Contract Terms

From November 2016 the Australian Consumer Law was extended to protect small businesses from unfair contract terms. The legislation was the Treasury Legislation Amendment (Small Business and Unfair Contract Terms) Act 2015 (Cth)

The law protects small business from having to accept 'take it or leave it' standard form contracts from large companies. In the case of plumbers, this means protection from building companies or developers who want to dictate unfair contractual terms.

The Act defines a small business as one that employs less than 20 staff and covers contracts that have an upfront price payable of less than \$300,000 or more than \$1 million if the contract is valid for longer than 12 months.

We believe these thresholds are too low and fail to protect many plumbing businesses.

POLICY 7 The Unfair Contracts Legislation should be changed to increase the number of employees in the definition of a small business from 20 to 100, and to increase the upfront price payable threshold from \$300,000 to \$3 million for contracts that last up to 12 months, and from \$1 million to \$9 million for contracts longer than 12 months.



Small Business

Background

Small businesses are the lifeblood of the Western Australian economy and dominate the plumbing contracting sector. They have a heavy administrative burden, which is the result of multiple compliance and reporting requirements. This reduces their productivity and takes their owners' attention away from critical areas such as financial management and customer service.

Issues and Policies

Legislative Sunset Clause Provisions

The Australian Government and WA Government could assist small businesses by including sunset provisions in any new business legislation. This will help reduce red tape and remove the potential for contradictory regulation that may exist without legislative amendments.

A sunset provision means the introduction of a new piece of business or industry-related legislation would be accompanied by the replacement and removal of an existing piece of legislation on a one-for-one basis.

POLICY 8 New legislation that affects businesses should include sunset provisions.

Superannuation Administration

The cost of superannuation administration is a burden for small business.

POLICY 9 Government should pay the administrative costs of superannuation and other government legislated programs.

Superannuation Contributions

The increase in compulsory superannuation contributions in future years remains a challenge. We believe that further increases beyond 10 per cent and up to a rate of 12 per cent are unsustainable.

POLICY 10 The compulsory superannuation contribution of 12 per cent is unsustainable and should be capped at 10 per cent.

Company Tax

Lower businesses taxes assist the growth and profitability of the industry and the creation of additional employment opportunities.

The Australian Government intends to reduce tax for base rate entities to 25 per cent by 2021-22. A company is a base rate entity if its annual turnover is below a certain threshold, which in the 2021-22 year will be \$50 million.

POLICY 11 The Australian Government's commitment to reduce company tax for base rate entities to 25 per cent by 2021-2022 is a positive development for licensed plumbing contractors.

Payroll Tax

While payroll tax is an important source of revenue for state and territory governments, it is a tax on the employment of Australians and a disincentive to grow small and medium businesses.

Each state and territory has different tax and threshold limits, creating further confusion and complexity for national businesses.

POLICY 12 The Australian Government, the WA Government and the governments of other states and territories should have a national discussion about a timetable to harmonise payroll tax regimes and a long-term plan for its eventual phasing out.

Alignment of Business Reporting Timeframes

The mis-alignment of key reporting timeframes across the financial year imposes a 'red tape' burden on small businesses such as plumbing businesses. There are different reporting times for BAS and PAYG, fringe benefits tax (FBT), workplace gender equality compliance (WGEA) and other items.

POLICY 13 The reporting schedules for BAS, PAYG, FBT, WGEA and others should be reviewed and aligned to reduce the administrative burden on businesses.

Adult Apprentice Wage Subsidy

Adult apprentice numbers are declining, with employers saying the reason is the cost of their wages.

An adult apprentice generally has higher rates of pay through the Workplace Relations Act and other industrial awards. They are often priced out of the market as they are perceived to be too expensive compared to apprentices who are recent school leavers. However, their productivity is often much higher due to previous work experience.

POLICY 14 The Australian Government should pay a wage subsidy to employers who employ adult apprentices. The subsidy should match the difference between the hourly rate of a junior apprentice and the hourly rate of an adult apprentice across each year of the apprenticeship. We call on the WA Government to support this policy in the interests of Western Australian training and employment.



Standards and Product Safety ●

Standards and Product Safety

Background

Although the plumbing and gasfitting industry in Australia is highly regulated, there are some important areas that still need to be addressed in the interests of public health and safety. They include the testing for metals in drinking water, the level of lead in brass, the application of the WaterMark Certification Scheme, legionella testing in aged care facilities.

Another issue that needs attention is the expense incurred by MPGA representatives during their voluntary work when reviewing and developing standards.

Issues and Policies

AS/NZS Standard for Sampling Drinking Water

Australia lacks a consistent and appropriate methodology for taking samples when testing for metals in drinking water.

The process of taking samples of drinking water 'in the field' – in other words, from taps or drinking fountains connected to a water supply system – and testing it to find out how much metal it contains should provide consistent and standards-based data that indicates whether it is safe to drink.

The Australian Drinking Water Guidelines specify what the maximum concentration of various metals should be. For example, the Fact Sheet on Lead says "Based on health considerations, the concentration of lead in drinking water should not exceed 0.01 mg/L."

While the Australian Drinking Water Guidelines information is clear, the sampling method is in the hands of the agency that does the testing. This means test data inconsistencies can occur within a series of tests at the same site and across tests at different sites.

There are variables such as the stagnation period before samples are drawn, the number of samples taken and the volume of water in each sample.

POLICY 15 Australia needs a standard method of taking samples of drinking water when testing whether the levels of metals in the water comply with the Australian Drinking Water Guidelines. The aim should be to replicate, as closely as possible, the way people will consume water over the course of a day at the site concerned.

The Level of Lead in Brass

Lead is a toxic substance that the human body easily absorbs and accumulates. Unborn babies and young children are especially vulnerable to lead poisoning.

High levels of accumulated lead in the body can damage the kidneys and nervous system in children and adults. Low levels can cause a range of severe neurological and physical problems that include, but aren't limited to, irreversible harm to brain development, learning disabilities, behavioural problems and impaired growth.

The World Health Organisation says no level of lead is safe, but Australia allows 4.5% lead content in brass fittings and typical levels are 2% to 4%.

The National Plumbing Code of Canada has referenced plumbing standards with requirements for the 0.25% lead limit since November 2013.

In the USA, legislation limiting the weighted average lead content of pipes, pipe fittings and plumbing fittings to 0.25% became effective in January 2014.

In 2016, Macquarie University studied widespread copper and lead contamination of household drinking water New South Wales, tested 212 homes and discovered that 8% had levels of lead in tap water above the Australian Drinking Water Guidelines. This research also analysed household plumbing fittings and found they are a significant source of drinking water lead contamination.

In 2018, the Macquarie University report Lead in Plumbing Products and Materials (commissioned by the Australian Building Codes Board) made a number of recommendations, including:

"In order to limit the release of lead into drinking water, consideration should be given to recommending that only low lead or preferably lead-free plumbing components should be used during installation of drinking water systems."

The Lead in Plumbing Products and Materials report considered a wide range of detailed evidence including overseas research, review of the standards and submissions from manufacturer and industry groups.

POLICY 16 Australia should follow Canada and the USA and reduce the allowed level of lead in brass plumbing fittings to 0.25%.

Standards and Product Safety

WaterMark Certification Scheme: Imports and Point of Sale

Although anyone in Australia can legally buy non-WaterMark compliant products, it is illegal for licensed plumbers to install them. The result is frustration for customers, stress for licensed plumbers, and cost and inconvenience when products fail.

The use of substandard, non-WaterMark compliant plumbing products can have potentially catastrophic and long-term consequences for public health. There is convincing evidence that Australia already has a major problem, with a 2016 study by Macquarie University scientists showing many homes have harmful levels of lead in their tap water. A primary cause of contamination is lead-brass taps sold in retail hardware stores.

The lack of support by state and territory governments for WaterMark contrasts with their long-standing support for retail compliance with WELS.

POLICY 17 WaterMark certification should be mandatory for all plumbing products imported, sold or installed in Western Australia, if they are in categories that require certification.

POLICY 18 It should be illegal to import non-WaterMark certified products if they are in categories that require certification. We want the WA Government to follow the lead of Queensland's non-conforming building products legislation, which addresses this problem.

POLICY 19 WaterMark compliance should be mandatory at the point of sale. Western Australia needs a point-of-sale compliance regime that includes prominent WaterMark labelling and consumer information equivalent to the labelling and consumer information required under the Water Efficiency Labelling Scheme (WELS).

WaterMark Certification Scheme: Prefabricated Units

The use of prefabricated units (often called pods) with integrated plumbing work is increasing. Currently, installing plumbers and building inspectors are responsible for assessing the WaterMark compliance of plumbing systems inside the units. This means they have to say whether plumbing products they cannot see are WaterMark certified and have been assembled correctly.

Installing plumbers are often under pressure from builders and developers to connect prefabricated units into the building. This forces them to choose between installing products they cannot assess for WaterMark compliance or refusing and becoming unemployed.

POLICY 20 WaterMark certification of prefabricated units should not occur at the point of installation.

POLICY 21 WaterMark certification of prefabricated units should occur at the point of construction. The certification should be mandatory and should be carried out by a licensed plumber. Queensland already has this requirement and Western Australia should follow their lead.

Legionella Testing and Risk Assessments

The dangers of Legionella bacteria are well documented. Occupants of care facilities such as retirement villages, nursing homes and hospitals are extremely vulnerable due to age, bad health and poor immune systems. However, Australia lacks a national approach to controlling Legionella bacteria in these places.

POLICY 22 Western Australia and all other jurisdictions should have compulsory Legionella testing and risk assessments in aged and health care facilities, early childhood centres, schools and nursing homes. Licensed plumbers with approved Legionella training should perform the skilled work of collecting water samples and performing risk assessments. Tempering devices should also be tested every 12 months.

Reimbursement for AS/NZS Standards Committee Work

Representatives from the industry associations that belong to Master Plumbers Australia and New Zealand volunteer their time on Australian Standards committees. Their participation, which guarantees the plumbing and gasfitting industry's views are heard, enhances during the process of creating and reviewing standards.

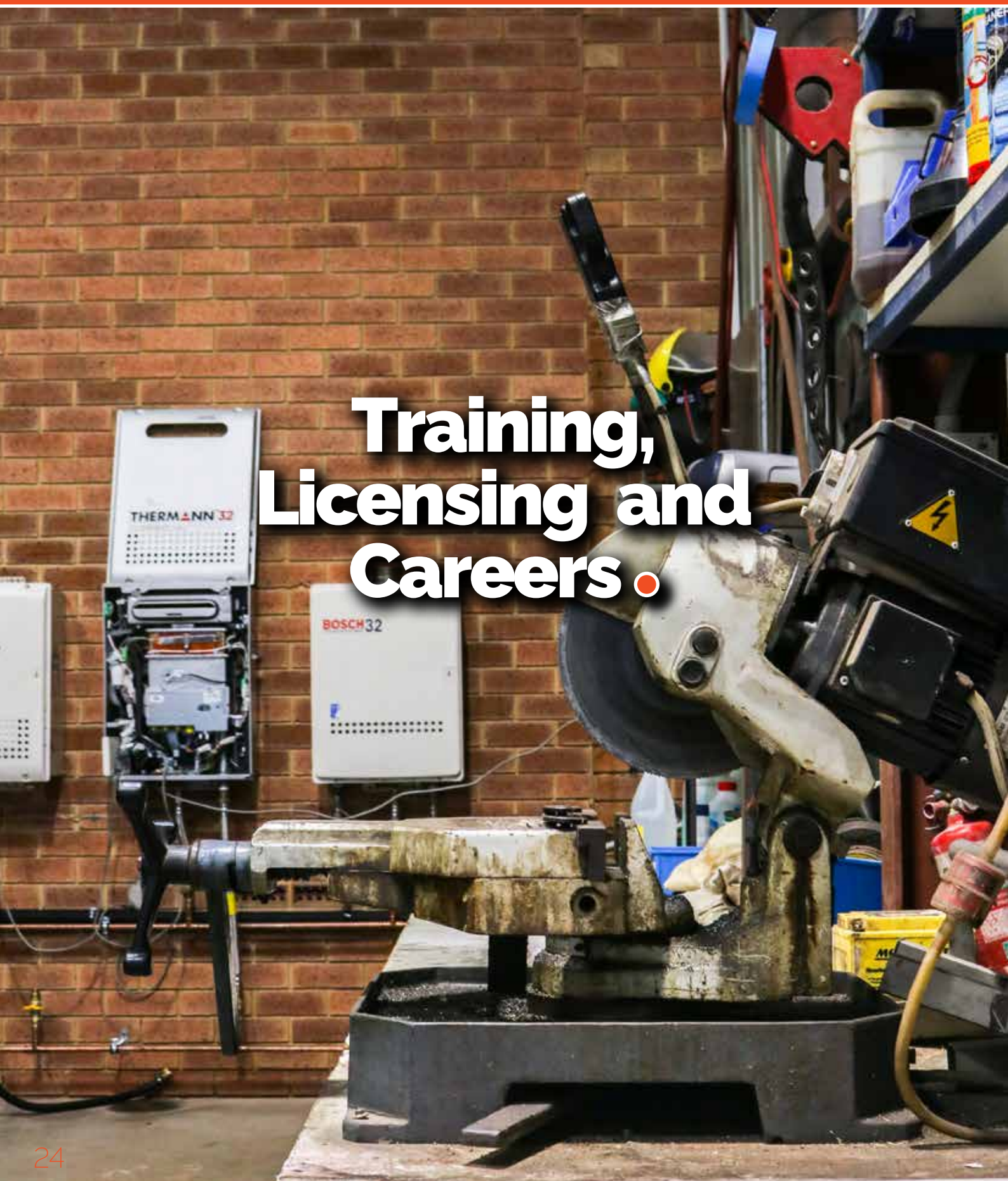
Because every representative attends multiple meetings every year, the cost of travel and accommodation is a significant financial burden for Master Plumbers Australia and New Zealand and its member organisations.

POLICY 23 Standards Australia should reimburse Master Plumbers Australia and New Zealand for all travel and accommodation costs related to reviewing AS/NZS Standards.





Training, Licensing and Careers ●



Training, Licensing and Careers

Background

Australia's inconsistent training and licensing is an impediment to an efficient plumbing and gasfitting industry and confidence in the building and construction sector.

The inconsistency of training and licensing regimes across the states and territories means the competencies of licence holders vary greatly between jurisdictions. Although our jurisdictional licensing systems protect the health and safety of the people within each jurisdiction, they are incompatible with each other.

There are strong links between training, apprenticeships and youth employment. In remote Aboriginal communities, the presence of young people with plumbing qualifications could play a significant and highly cost-effective role in improving community health.

Issues and Policies

Aboriginal Health, Training and Employment

Many Aboriginal communities have issues with water supply, sanitation and plumbing maintenance, leading to health problems that may affect people throughout their lives. Isolation and lack of education opportunities leads to youth unemployment problems. Governments have had limited success with their efforts to improve living standards despite spending large sums of money over many years.

Our policies in this area are based on the Better Life Outcomes concept, which we developed. Better Life Outcomes proposed a strategy for creating a cost-effective, practical, permanent national program that joins the dots between plumbing, sanitation, health, training and youth employment in Aboriginal communities.

POLICY 24 Remote Aboriginal communities should have regular scheduled inspections and maintenance to ensure their plumbing infrastructure is compliant with legislation and works properly. This practical step will reduce the incidence of water-borne diseases in communities.

POLICY 25 Plumbing apprenticeships should allow for a more flexible training structure that encourages young people from Aboriginal communities to become qualified plumbers.

POLICY 26 The WA Government should ensure employers comply with Aboriginal employment targets, including the employment of apprentices.

Apprentice Training

The standard of theoretical and practical apprentice training needs to improve. A final assessment unit in the Certificate III in Plumbing course would help to address this problem by requiring apprentices to prove they have well-rounded practical and theoretical knowledge before they get their licences.

It is also clear that relationships between apprentice, RTO and employer need more attention. A major weakness of the current approach is the disconnection that often exists between classroom training and the on-the-job tasks employers ask apprentices to perform. The reporting system we are calling for will go a long way towards improving this situation.

POLICY 27 The Certificate III in Plumbing course should include a final training and assessment unit that apprentice plumbers must pass before applying for their licences. This unit should revise all the theoretical and practical training apprentices receive during the Certificate III in Plumbing course. To avoid biased assessments, the role of delivering the unit and evaluating the competency of apprentices must belong to an independent industry body.

POLICY 28 The Certificate III in Plumbing course should include a reporting system that requires RTOs to provide employers with reports about how their apprentices are progressing. There should be a report after each block of training and an annual summary report. All reports should include comments about both attitude and ability.

Training, Licensing and Careers

Plumbing Contractors' Licences

It is too easy for a licensed plumbing tradesperson to become a licensed plumbing contractor. Some licensed plumbing contractors start their own companies and become employers with limited industry experience, poor business management skills and no understanding of the financial and legal risks they are taking on.

The result is that business failures, financial stress and poor customer service are widespread in our industry. This is a consumer protection issue as well as a technical licensing issue and it reflects badly on the whole industry.

POLICY 29 Licensing bodies in all jurisdictions should introduce additional units of competency in the Certificate IV in Plumbing and Services course. This additional training should focus on commercial skills and the risks and responsibilities involved in running a business and being an employer.

POLICY 30 After gaining the Certificate III in Plumbing, a licensed plumber should have to build their overall level of competence by completing at least three years on-the-job work experience before being eligible to apply for the Certificate IV in Plumbing and Services course.

Consistent Licensing Across Australia

Australia needs a consistent national approach to the licensing of plumbing practitioners.

In our rapidly evolving industry, a consistent licensing regime across all jurisdictions is essential if we are to have a national approach to compliance enforcement that protects public health and safety.

As recommended in the Shergold and Weir report Building Confidence, these requirements must include consistency in all licensing prerequisites including theoretical and practical training, competence and experience, insurance cover and fit-and-proper person requirements.

MPGA supports the concept of national recognition of occupational licences. The plumbing and gasfitting industry has advocated for many years for the introduction of a national licensing system coupled to identical training requirements in all states and territories.

The reason for our concern is that the inconsistency of training and licencing regimes across the states and territories means the competencies of licence holders vary greatly between jurisdictions. Although our jurisdictional licensing systems protect the health and safety of the people within each jurisdiction, they are incompatible with each other.

Although training for plumbers and gasfitters in all jurisdictions offers 'core' and 'elective' units of competency prescribed by the Australian Qualification Framework, each jurisdiction has its own regulations about the minimum number of units required to qualify for a licence. Plumbing and gasfitting work regulated in one jurisdiction is not necessarily regulated in another. There are also inconsistencies in the classes of licence issued and the required competencies for each class.

POLICY 31 We want all states and territories in Australia to have consistent requirements for the training and licensing of plumbing tradespeople, plumbing contractors and hydraulic consultants. This should include all states and territories following the lead of Victoria and requiring specific licenses for stormwater and roofing work. Along with consistent licensing requirements in all jurisdictions, we want to see a national licensing scheme like the National Driver Licence Scheme with standard definitions and licence types.

Continuing Professional Development

The plumbing and gasfitting industry in Australia lacks a mandatory continuing professional development program.

Other industries and professions have continuing professional development programs to ensure qualified people stay up-to-date with skills and knowledge during their careers. Our industry is as dynamic, complex and important as any other and so we have the same need for continual learning.

The Shergold and Weir Building Confidence report recommended that each jurisdiction require building practitioners to undertake compulsory continuing professional development on the National Construction Code, which includes the Plumbing Code of Australia. Shergold and Weir identified the dynamic nature of the building industry, the complexity of the National Construction Code and the need to keep practitioners up to date as issues that need addressing.

POLICY 32 Licensing of plumbing contractors in Australia should be tied to a mandatory, nationally recognised continuing professional development program, as recommended in the Building Confidence report. The WA Government should support this by introducing a state-based program as a first step on the path to a national program.

Hydraulic Consultant Qualification

Australia lacks a nationally consistent training pathway that qualified plumbers can follow to become hydraulic consultants.

The Plumbing Code of Australia says complex solutions such as Performance Solutions and Deemed-to-Satisfy Solutions should be designed and verified by a person with 'expert judgement'. In our view, this means a qualified hydraulic consultant.

POLICY 33 Licenced plumbing contractors should not be held responsible for verifying complex solutions. Australia needs a defined training pathway to a hydraulic consulting qualification. The foundation of this pathway should be the existing broad apprentice training (with 57 units of competence), plumbing tradesperson's licence and plumbing contractor's licence. The final stage should be a hydraulic consulting diploma course, developed and implemented in consultation with the industry.

Carbon Monoxide Training

Carbon monoxide is an odourless poisonous gas, which all fuel-burning appliances normally produce in small quantities. When a gas heater is faulty or incorrectly installed and ventilation is poor, the level of carbon monoxide in a room can quickly increase to a deadly level.

Australia lacks a training course that informs plumbers about carbon monoxide and makes them competent in testing appliances for carbon monoxide emissions.

Many consumers are unaware of the risk of carbon monoxide poisoning from gas heaters and the need to have their heaters tested.

POLICY 34 Australia needs a nationally accredited carbon monoxide training course for plumbers and gasfitters. This training should be part of the Certificate III in Plumbing course for apprentices and be mandatory additional training for licensed plumbers and gasfitters and licensed plumbing contractors.

POLICY 35 Western Australia needs a Government-funded campaign to make consumers aware of the risks of carbon monoxide poisoning and why gas heaters should be regularly tested.

Regulators' Priorities

The Plumbers Licensing Board puts too much emphasis on catching non-compliant paperwork and not enough emphasis on catching illegal plumbing work. Qualified plumbers are penalised for minor administrative matters while illegal plumbing work by non-plumbers gets little or no attention.

We believe this reflects an attitude that the purpose of regulation and compliance is to punish licensed plumbing tradespeople and contractors who work according to the law but may get behind with paperwork or make minor mistakes. In contrast, there are very few prosecutions for do-it-yourself plumbers or the illegal commercial activities of non-plumbers who charge for plumbing work.

POLICY 36 The Plumbers Licensing Board must prioritise chasing illegal plumbing instead of unimportant paperwork slip-ups.

Plumbers Using Other Plumbers' Licences

When a licensed plumbing contractor 'lends' their licence to someone who pretends to be the real licence holder for the purpose of performing plumbing work and invoicing customers, both parties are breaking the law. They are also undermining both the integrity of the licensing system and public trust in the plumbing trade.

WA regulations contain penalties for using another contractor's licence.

POLICY 37 The Plumbers Licensing Board should act against the illegal practice of licensed plumbers lending their licences to others.

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