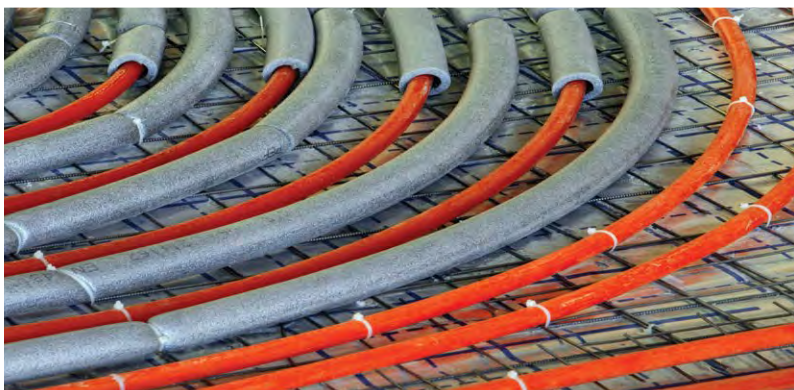


A stronger plumbing industry safeguarding our community

Plumbing industry priorities



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plumbers**
Expert. Committed. Professional.



Master Plumbers and Mechanical Services Association of Australia

Master Plumbers and Mechanical Services Association of Australia (Master Plumbers) was established in 1891 and is the industry's representative and voice on safety, standards and training. Master Plumbers' focus is on supporting our members and ensuring the health and safety of our community. We provide a qualified and expert perspective on issues related to the plumbing profession and opportunities to enhance the future of our industry.

The plumbing industry plays a vital role in our community, providing a range of services that include: hot and cold water supply; heating, cooling and ventilation systems; metal roofing, stormwater and sanitary drainage systems. It is a regulated and competitive industry which is largely comprised of small to medium sized contractors with some larger companies.

Nationally, the plumbing industry contributes \$14b to the economy and it is forecast to grow in activity and revenue in the coming five years with an increased demand for plumbing services.

The plumbing profession is highly regulated because of the inherent risks involved in providing clean drinking water, disposing of harmful waste and ensuring the safety of our gas supply and appliances used in homes and businesses. In Victoria, these risks are managed through a regulatory framework which defines the scope of plumbing works, restricts entry to the market to suitably qualified persons and defines the standard of work required. All prescribed plumbing work in Victoria must be either carried out by a registered or in some cases a licensed plumber.

In Victoria there are approximately 26,000 registered plumbers. Around half of these are licensed and are able to issue Compliance Certificates which must accompany significant plumbing work, such as where the work value exceeds \$750.

The Victorian Building Authority (VBA) is the regulator which manages both the standard of plumbing work through an audit regime and the registration of plumbing practitioners.

Master Plumbers has identified seven key priorities which we believe are critical to the ongoing improvement of our industry and the safety of the communities our members serve.

On behalf of our members, we call on all political parties to commit to these priorities to build a stronger plumbing industry and a safer community.



Scott Dowsett
President
Master Plumbers



Peter Daly
CEO
Master Plumbers

- PRIORITY 1** Ensuring the health and safety of our community
- PRIORITY 2** Safeguarding consumers' access to compliant plumbing products
- PRIORITY 3** Providing a fit-for-purpose compliance system to meet the increasing complexity in plumbing
- PRIORITY 4** Delivering a four-year comprehensive plumbing apprenticeship program as a minimum requirement for registration
- PRIORITY 5** Providing lifelong learning to future-proof our industry
- PRIORITY 6** Supporting security of payment for plumbing contractors
- PRIORITY 7** Cutting red tape to build a more efficient plumbing industry



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1

Ensuring the health and safety of our community

Plumbers play a vital role in developing and maintaining public health and safety through access to clean water and sanitation and the safe installation and servicing of gas appliances. While Victorian consumers enjoy high plumbing standards, it is essential that this work is overseen by a knowledgeable, respected and well-resourced regulator.

Carbon monoxide

The potential danger of carbon monoxide (CO) poisoning exists in any home with gas appliances that are incorrectly installed or are not regularly serviced. Modern requirements for a building to be energy efficient has meant that homes are often sealed against outside air. As a result, some older appliances which rely on a ready supply of air are at increased risk of producing deadly levels of CO. The dangers of CO highlight the necessity that a properly qualified gasfitter tests and services gas appliances to ensure they are safe to use. It is important that their skills in installation and servicing of gas appliances are up-to-date. Master Plumbers regularly offer courses for Victorian plumbers on CO testing procedures and supports extending training requirements in these essential skills.

Lead

Lead content in brass or copper fittings and fixtures has been shown to contribute to the increased occurrences of higher than normal levels of lead in drinking water. While this is often linked to old pipes in the system, there is a more current issue with the availability of cheap imported fittings which do not meet Australian safety requirements as determined by the WaterMark Certification Scheme. Master Plumbers is concerned that there is no requirement for display of WaterMark compliance at 'point of sale,' thereby exposing the public to potentially dangerous fixtures.

Legionella

While Legionnaires' Disease is not common, it can have tragic consequences and the potential to affect many people concurrently. The increasing use of warm water systems in buildings, which lower water temperature to reduce scalding risks, along with the more common potential sources of legionella such as cooling towers, means that the community is at risk. Plumbers have the expert knowledge to inform their customers on important maintenance procedures, however this will be most effective when partnered with more rigor from the regulator in the form of an increased compliance regime.

Asbestos

Asbestos remains a major risk for plumbers and the community. The Asbestos Safety and Eradication Agency states that at least one in three Australian homes may contain asbestos – mostly those built or renovated prior to 1990. A third wave of people who have been exposed to asbestos fibres is occurring through building redevelopment work or house renovations. Master Plumbers provides specialised training for plumbers and urges a greater awareness campaign to promote checking potential risk areas before commencing any form of intervention.

WHAT WE WANT

Phase out open flued gas heaters starting with all public buildings and rental properties.

Mandate routine gas appliance servicing for all public-sector housing and rental properties.

Introduce a more rigorous audit and compliance regime for public buildings with cooling towers to reduce the risk of legionella outbreaks.

Introduce Watermark Certification for plumbing products at point of sale.

More vigorously promote a public health and safety awareness program on the risks posed by asbestos, legionella, lead and carbon monoxide.



2

Safeguarding consumers' access to compliant plumbing products

Changes in industry procurement and consumer purchasing patterns has raised concerns which may ultimately impact on consumer safety and risk to plumbers.

Currently the WaterMark Certification Scheme (WCS) is the industry standard for plumbing products in Australia to protect consumer safety. Compliance is managed by States and Territories. Licensed plumbers are responsible for installing WCS compliant products.

This quality standard is now being compromised by some developers and builders procuring goods overseas and avoiding WCS compliance requirements. This is further compounded by the availability of imported, non-conforming products online. Under current arrangements, there is a danger for retailers and distributors as there are no barriers to the sale of non-WCS goods. With no indication whether the product meets the WCS standards, the plumber may unknowingly be confronted with non-compliance after a job is completed.

Non-conforming and poor quality plumbing products also pose significant risks to consumers. The WCS process was put in place to mitigate these risks but has not kept pace with changing procurement and purchasing practises.

Queensland leads the way nationally with the requirement for point of sale WCS on all plumbing products. Aligning Victoria's approach with Queensland will build consistency and therefore efficiency nationally.

A further concern is the growth in the construction of modular units that are assembled offsite and delivered to site in a close to completed form. These pods are becoming more common with bathrooms, hot-water systems and pump installations, and typically combine WCS materials with general plumbing supplies. This practice calls into question the scope of the WCS to effectively set and manage the standards for consumer safety into the future. It has been proposed by some that the assembled unit could be watermarked as an alternative to a certificate of compliance, a loophole which Master Plumbers strongly rejects and believes must be immediately closed.

WHAT WE WANT

WCS approval should be mandated and displayed at point of sale (trade, retail and online) on all plumbing products to protect water and waste infrastructure.

Offsite constructed modules should be subject to the provision of a certificate of compliance from a licensed plumber when the assembly of the unit involves plumbing works:

- the plumber responsible for the offsite construction of the plumbing system within the module would issue a certificate of compliance and be responsible for the warranty on the plumbing system, and
- the licensed plumber responsible for the onsite plumbing connection would issue a certificate of compliance warranting their work up to the connection to the module but not the module itself.



3

Providing a fit-for-purpose compliance system to meet the increasing complexity in plumbing

Complex plumbing involves the installation of specialised plumbing systems in buildings, such as healthcare facilities, large multi-storey commercial and residential developments and many public buildings.

Master Plumbers believes that further controls need to be applied to this growing segment of the market in recognition of, and to mitigate, multiple inherent risks.

The current system and regulatory framework does not adequately meet the specific needs of plumbing in the complex market. This covers all aspects including plumber qualification and licensing, design and installation of work, and regulation of compliance against standards. Beyond the competencies necessary to be licensed for specific classes of work, there are no specific qualifications or skills requirements reflective of the size, complexity, and potential risks associated with large scale complex plumbing work. Equally, a licensed plumber may be responsible to certify compliance in areas which exceed their skills and experience as many of these systems include complicated hydraulic engineering design.

Currently in Victoria, the less complex work such as in residential housing is well regulated by certifiers with appropriate skills and experience underpinned by an audit regime governed by the Ministerial Order 2002. The system of self-certification is well supported by a monitoring and compliance regime including random audits by the Victorian Building Authority (VBA). Presently, the VBA audits approximately five percent of compliance certificates on completion of the work.

The current compliance regime requires an audit upon completion, but while this is appropriate for the domestic market, it does not transfer to complex developments where the plumbing work can be hidden behind the façade of the building. It is also apparent that the Ministerial Order 2002, as the platform for consumer protection, is not suitable for larger-scale, specialised and complex construction.

WHAT WE WANT

Review the efficacy of the current system of monitoring and certification in light of the increasingly complex nature of plumbing work and construction projects.

Develop regulatory treatments which distinguish between complexity of plumbing work in:

- qualification and licensing of plumbers, ensuring fit-for-purpose skills, and
- regulation practices and certification compliance, aligning standards and controls in relation to the Ministerial Order 2002.

Stronger recognition and engagement by State Government on approaches to complex plumbing and improvements to the current system which more effectively support sound and safe plumbing practices.



Delivering a four-year comprehensive plumbing apprenticeship program as a minimum requirement for registration

Apprenticeship training continues to prove the most effective and comprehensive way of developing plumbing knowledge and skill. Industry-led training has provided a clear advantage for apprentices to experience a broad-based approach to learning as it most readily reflects the nature of work they will be entering. This program of learning combined with industry practice and mentoring, sets the standard for plumbers to be registered and ensures that they commence as work ready and skilled tradespeople.

Working as an industry group in the provision of apprenticeship training enables timely response to market changes, ensuring that quality plumbers are moving into the field to meet demand.

Given the responsibilities for licensed plumbers to certify completed work, the comprehensive and practical approach to training offered through industry programs prepares them for the variety of work and requirements that they will face on the job. The increasing complexity in plumbing work and products requires this high level of practical skill and knowledge.

Two independent systems currently exist for pathways into the profession – the TAFE system, and an industry-based system. In its 2018/19 budget, the Victorian Government announced free tuition for students undertaking Certificate II and IV plumbing training. Industry training was not included, changing what was previously a level playing field for training providers where students chose based on quality of offering. This current inequitable system limits the opportunity for all students to access the education of their choice.

Surprisingly, shared learning across the two systems is not permitted. The TAFE system has limited ability to work with industry, thereby denying the opportunity for students to achieve the best learning outcomes and building efficiencies and capacity across the training sector.

WHAT WE WANT

A minimum four-year education and experience requirement for a plumber to become eligible for registration.

Extension of free tuition for industry-based Certificate II and Certificate IV apprenticeship training as the TAFE system current receives.

Removal of barriers which prevent TAFE Colleges from collaborating and contracting with, industry RTOs.



5

Providing lifelong learning to future-proof our industry

Traditionally, the plumbing industry has valued continued learning to maintain technical proficiency and increase knowledge in line with industry developments. Usually this has been undertaken as an initiative by the individual to attend courses and training sessions of interest, such as those offered regularly through Master Plumbers.

Master Plumbers strongly advocates the introduction of a program of Continuous Professional Development (CPD) as exists for many other professions. This form of accreditation and lifelong learning sets standards and provides oversight to the level of ongoing education being delivered and will ensure that plumbers, with direct connection to the health and safety of our community, are always appropriately skilled. It will align learning throughout a plumber's career with regulatory, compliance and technological developments and provide a level of confidence to the end consumer and regulatory bodies.

The development of an accredited CPD program for plumbers should be linked to the process for licensing, so that renewal of licenses would be dependent on the achievement of required CPD activities in specified classes, topics and skill areas.

Master Plumbers Tasmania has partnered with the Tasmanian State Government in the provision of the state's CPD program for plumbers. The opportunity exists to learn from their experience, and other professional groups, to implement an effective system in Victoria.

WHAT WE WANT

Development of an industry-based CPD program which focuses on the maintenance of proficiency, awareness of changes in the industry and increasing a plumber's skills in line with industry developments.

Requirement for a CPD program to be linked to the renewal of licensing of plumbers.



Supporting security of payment for plumbing contractors

Security of payment is a key issue amongst plumbers as they are generally subcontractors and reliant on payment from head contractors for cash flow to maintain their business. The Australian Government Department of Jobs and Small Business conducted the report 'Review Security of Payment Laws: Building Trust and Harmony,' Its purpose was to identify legislative best practice which enables consistency in security of payment legislation and the level of protection for construction industry subcontractors. This aims to ensure they obtain payment for work they have completed or for goods and services they have supplied.

The Review reported on a range of recommendations which are important to the long-term security of plumbing enterprises.

The recommendations resulting from the Review are based on the preferred East Coast model and seek to:

- Promote prompt payment to maintain a subcontractor's cash flow
- Ensure the legislation is drafted and structured as simply as possible
- Provide an appropriate balance regarding timing in the adjudication process
- Secure payments from misuse and the risk of head contractor insolvency by implementing a cascading statutory trust, thereby securing the payments of all subcontractors
- Achieve a nationally consistent and effective set of security of payment laws with implementation of the best practice recommendations which requires that the relevant Australian, State and Territory Government Ministers to work together.

WHAT WE WANT

Australian, State and Territory governments should develop and enact national legislation to ensure security of payments for construction industry subcontractors.

Ensure a straightforward and timely system is put in place which will benefit construction industry subcontractors and their ongoing financial security.

Ensure a legislative system which does not compromise the commercial relationship between the subcontractor and head contractor.



Cutting red tape to build a more efficient plumbing industry

Master Plumbers provides a range of advisory services to its members which work through the many legislative, regulatory and commercial systems under which they operate. As such, Master Plumbers supports the development of meaningful reforms that will reduce the regulatory burden for the sector.

In considering the complexity, interaction and overlap between small business regulation in the construction sector, it is essential to ensure the regulation sets meaningful and appropriate standards which deliver consistent quality, safety and performance in a dynamic and demanding industry.

Inconsistencies and duplication also exist in the different approaches taken between governing bodies such as water authorities. Pressing examples include backflow prevention device register requirements and grease trap installation, which are not consistently covered by all water authorities, causing oversight and compliance to vary within regions. This causes additional cost, that is ultimately passed through to the end consumer, and potential public health and exposure for the plumbers involved.

WHAT WE WANT

Practical engagement with industry member associations in the Small Business Regulation Review Regulatory Interaction – Construction Sector project.

Engagement with Master Plumbers on the development of a consistent approach by water authorities on developing a register for backflow prevention devices.

Develop a consistent and practical approach to information sharing regulatory bodies and the water authorities.



Conclusion

Victoria is highly regarded for its robust training, licensing and regulation of the plumbing industry. To stay at the forefront, action is required to meet the increasing complexity of plumbing services and the construction sector. In this way, plumbing will continue to deliver economic benefit to Victoria in terms of increased education opportunities, employment across the state and revenue growth.

Master Plumbers urges the consideration of our priorities and welcomes broad input and discussion.

Contact

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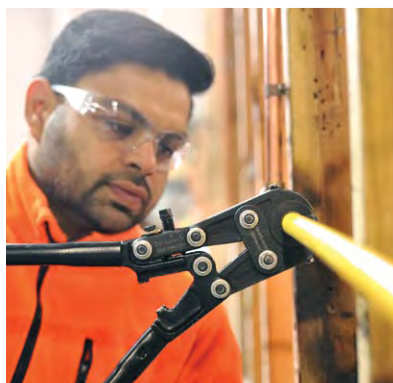
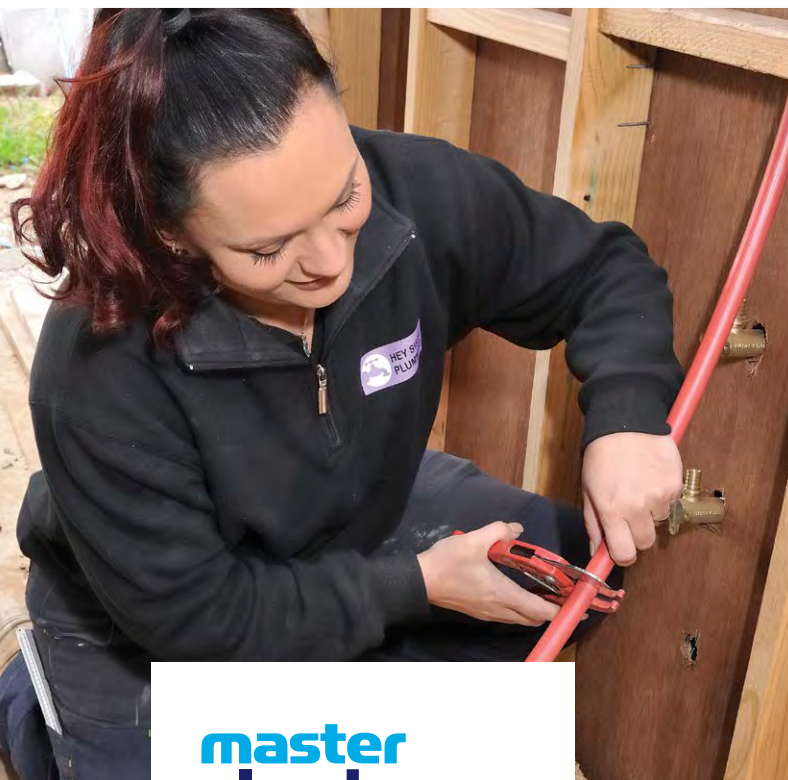
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