



**BUILDING
PRODUCTS
INNOVATION
COUNCIL**

Industry Position Paper - NCC Evidence of Suitability (A2) Review

Prepared by:

Building Products Innovation Council

Rodger Hills - Executive Officer

PO BOX 417

RANDWICK NSW 2031

Phone – 0438 740 240

Email – eo@bpic.asn.au

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Executive Summary

The Australian Building Codes Board (ABCB) is reviewing the Evidence of Suitability (A2) provisions in the National Construction Code (NCC). The Building Products Innovation Council (BPIC) has prepared the following Industry Position Paper on behalf of its members and the wider building industry to help inform the A2 review.

Over the last decade there has been a shift in the building products supply chain to an increased use of offshore sources along with a decreased level of local manufacturing of these products (with the exception of site-specific local manufacture like ready mixed concrete). Further, the ease of purchasing online has brought into the market a plethora of products from both domestic and international sources, buyers sourcing for example, small quantities or new products. However many do not have the knowledge to ensure products they purchase are 'fit-for-purpose'. Once these products are in the supply chain, the provenance is often lost and seeking a remedy when a problem arises becomes extremely difficult.

The current provisions in the NCC relating to Evidence of Suitability (see **Attachment 2 – NCC Evidence of Suitability (A2) Provisions**) have not essentially changed since the first edition of the Building Code of Australia in 1988, while the market has evolved considerably since then. A rapidly growing number of suppliers and buyers are seeking to use the code and verification weaknesses to deliberately substitute or provide substandard products. The desire by some developers, builders and key purchasing decision makers to reduce construction costs may also conflict with their obligation to deliver compliant and safe buildings. There is also a greatly reduced level of oversight of the construction process by skilled, experienced and independent practitioners to ensure good results. Not only are non-fit for purpose products hurting complying businesses, but they create downstream costs and safety concerns that are ultimately borne by building owners and taxpayers.

Rectifying building work that has used non-conforming building products, whether knowingly or not, is time consuming, costly and unproductive. It is essential to minimise the risk of nonconforming building products entering the supply chain.

Recent building fires have led to a false public and government perception that there are 'high-risk' products being used in buildings: i.e. products that are somehow inherently dangerous. This is not the case. BPIC and the wider building products industry wishes to make it clear that the issue is actually about conforming products that are used in inappropriate designs and forms of construction (non-compliant applications).

While the NCC Evidence of Suitability provisions have until now, focused on ensuring that products meet minimum standards and code compliance, far less emphasis has been placed on ensuring that products are used only for the purposes for which they are intended. This is a significant weakness in the current A2 provisions that requires immediate attention.

The building products industry strongly supports the ABCB's review of the Evidence of Suitability provisions in the NCC. Management of the building product supply chain is a national issue as building products are not affected by state and territory borders and Australian building regulations should clearly outline the type of evidence of suitability required for building products, materials, designs and systems.

The building products industry in Australia is and has always been self-reliant and self-funded. This paper is not in any way a veiled attempt at protectionism and we are definitely not seeking trade restrictions, tariffs, subsidies or any form of corporate welfare. What we are arguing for is a level playing field in the building industry for all participants.

Background

Economic Costs of Building Product Fraud

BPIC has continuously articulated to government, the significant economic costs associated with non-conforming and/or non-compliant building products. BPIC considers appropriate definitions of these types of products to be:

- Non-conforming building products (NCBPs) are products and materials that claim to be something they are not; do not meet required standards for their intended use; or are marketed or supplied with the intent to deceive those who use them.
- Non-compliant building products are conforming products that are used in situations where they do not comply with the requirements of the NCC.

A building product can be both non-conforming and non-compliant and can pose serious risks to the integrity of a building, the safety and welfare of those on the construction site and the ultimate inhabitants of the building.

For industry, the economic impacts of products that are not fit-for-purpose are significant and include a grossly uneven market where complying businesses are trying to compete against manufacturers that are selling non-conforming, inferior (and potentially dangerous) products and operating without important insurances such as recall insurance. Not only are the costs to complying manufacturers considerable (testing, documentation, labelling, warranty insurance, etc), but they may also suffer the following when competing with NCBP products:

- Lost sales, delayed sales and reduced revenue.
- Reduced margins and profit.
- Reduced market share and reduced growth in an expanding market segment.
- Decreased productivity.
- Loss of sustainability credentials.
- Reduced employment numbers.
- Reduced product innovation, features and quality (including shortened product lifetimes).
- Negative consumer sentiment towards complying products caused by the poor performance (deteriorate rapidly, fail prematurely or are unsafe) of NCBPs in the same market.

For consumers, the existence of NCBPs in their building is only discovered in certain situations such as where damage to the building results from the sudden failure of the product or where the poor durability of the product is revealed through its inability to resist reasonable wear and tear. In these instances, considerable costs will still be involved for consumers due to the need for the product to be identified and removed from affected buildings and replaced by suitable product which conforms to standards. Owners may also be faced with associated costs such as being deprived of using some or all of their buildings, higher insurance premiums and potentially reduced property values as a result of the perception that the building is sub-standard.

An Evolving Problem

Building products traditionally pass downstream in the supply chain from manufacturer or importer to a wholesaler who distributes both directly to trade buyers and to retailers. In recent years this picture has changed, with major retailers both importing directly and selling goods manufactured in Australia as their own brand products, thus taking on the liabilities of a manufacturer. With the rise of large retail supply chains, there are more and more instances of products being ordered by suppliers to conform with the supplier's requirements rather than the manufacturer's instructions and regulatory obligations. In some cases the supplier explicitly claims to be the manufacturer ('own brand'). In other cases, the manufacturer produces a distinct product which is only sold through that supplier chain (so suppliers can give 'price guarantees'). Suppliers are therefore more likely now to be in a position to directly affect safety and durability considerations, along with all other aspects of the products they sell.

Improved ease of import, declining availability from Australian manufacturers, international design trends and intensifying competitive pressures has led to more instances of 'one off' direct imports of small quantities (e.g. one shipping container load) of particular building products by builders and project managers for use on a particular project. Such imports often come from suppliers with whom no ongoing commercial relationship exists or is contemplated, and whose quality compliance performance is often unknown or unknowable. Under these circumstances, it is not surprising that greater potential exists for non-conforming, mislabeled, and counterfeit building products to enter Australia undetected.

Also, alternative products to those that are specified at the design stage of a building as part of an appropriate Evidence of Suitability process can be substituted without any effective mechanism to ensure the alternative has the same properties, performance and credentials as the original specified product. This situation is exacerbated by the practice of using the terms "or similar" and "or equivalent" on documentation where the critical performance metrics of the specified products are not listed so there is no way for alternative or substituted products to be evaluated against original fit-for-purpose compliance criteria.

Ultimately the most fundamental problem is that the majority of building products do not require any form of approval or have any requirement to attest to their performance and fitness for purpose prior to being offered for sale. In many instances, a conforming and a non-conforming product can look and feel the same. Establishing compliance at the point of sale is the most effective place for enforcement and will work for many products that have manufacturer compliance documentation, product approval forms, and certification, but it is not practical for all products and this needs to be taken into account.

Whilst Australian standards are called up in building codes, and thus by reference must be adhered to, the method of demonstrating compliance is poorly articulated. While mandatory certification would seem to be an answer to many of these issues, it has not proven to be completely effective in the electrical and plumbing sectors, and is not necessarily appropriate for building products used in many relatively benign applications (e.g. door stops, skirting boards, etc).

1. Recommended NCC A2 Changes

1.1 Compliance Pathways

Issues:

- Whilst third party certification is applicable to mass-produced and off-the-shelf products, it is inappropriate for custom/site-specific products that are to be used via the Performance-Based compliance pathway (e.g. precast concrete panels, complex plumbing solutions).
- The A2 provisions combine products, designs and systems together and treat them as equals for the purpose of evidence. This is no longer sufficient to address the broad range of ways a product may be used in a building. There is also no separation between the use of the provisions for designs versus products which creates confusion about which of the A2 pathways is appropriate.
- Changes in the building product market have seen not just building materials, but whole building facades, or even whole buildings, imported into Australia for local installation. How these mass-systems are to be managed is unclear.

Recommendations:

1.1.1 The NCC should consider product certification processes that are differentiated between the two compliance pathways (Deemed-to-Satisfy and Performance).

1.1.2 Either:

- (a) update the definition of ‘materials’ to include products, designs, systems, forms of construction, sub-assemblies and macro-assemblies (including the approval process for one-off vs. type/system), or;**
- (b) create separate clauses within each main compliance pathway to address products, designs, systems, forms of construction, sub-assemblies and macro-assemblies (including the approval process for one-off vs. type/system), with a review of each clause for its suitability for each group.**

1.1.3 Industry associations with certification schemes and authorities that comply with ISO/IEC 17065:2013 should be specifically referenced (where they exist) rather than a generic reference to a Certificate of Conformity or Certificate of Accreditation.

1.2 Terminology

Issues:

- The terms ‘adequate’ or ‘appropriately qualified’ are too broad and vague when seeking to specify the person/authority for the task.
- The definition of “*professional engineer*” means any company – in Australia or overseas - with someone who has an engineering degree meaning that they can sign off on their system being compliant. This can result in situations where for example, a civil engineer can certify a window assembly, or a retired, graduate or overseas engineer can certify products in situations they haven’t dealt with (or where an extended time has elapsed since they were in that industry situation).

- “Any other form of documentary evidence....” is also too vague and it is wide open to misuse and puts unreasonable responsibility on building certifiers. Who and what process is used to determine if it correctly explains the basis for compliance?
- The term “Registered Testing Authority” is out dated and does not align with current terminology for testing bodies.
- A2 refers to a variety of types of certificates which have duplicate meanings under internationally agreed terminology, for example “certificate of accreditation”.

Recommendations:

- 1.2.1 Tighten the definition of ‘adequate’ and ‘appropriately qualified’ person to ensure they have a national qualification recognised by an Appropriate Authority and that they belong to a reputable professional body with the means to confirm the national qualification, as well as the ability to regularly audit and discipline them if required.**
- 1.2.2 The definition of “professional engineer” should be re-examined, in consultation with industry stakeholders, to reflect the application of appropriate, verifiable industry and professional standards (especially since a number of Jurisdictions currently have no means to verify the competence of engineers), as well as mandating engineer’s areas of specialty and years of experience in those areas.**
- 1.2.3 All compliance by calculation must document the core assumptions being used for the specific building application.**
- 1.2.4 The A2(a)(vi) clause “Any other form of documentary evidence....” is an unacceptable method of support and it should be removed in its entirety.**
- 1.2.5 All terminology used in A2 should be reviewed to remove duplication (or divergence) with international terms and accurately reflect terms used under international (ILAC) agreements.**

1.3 Product Testing

Issues:

- Maintaining product tolerances and performance requires producers to constantly modify their production processes to ensure that raw product changes, manufacturing tolerance creep, inevitable wear and tear of production machinery and manufacturing process alterations do not diminish the performance of their finished products.
- ‘Type testing’ or ‘golden sampling’ are instances where:
 - An initial conforming product (or perhaps a prototype) is submitted for testing but the mass-produced item does not reach this same standard.
 - A conforming product is submitted for testing out of a range of similar product lines that do not reach this same standard, but which appear to be identical or closely resemble the compliant product.
- Suppliers marketing products manufactured by others as their ‘own brand’ and intimating to consumers that they are the original producers (or in control of the production process).
- There are concerns regarding the appropriateness of product test data when related to ‘as-built’ performance. Products and materials are generally tested in isolation, as individual components, not as systems or fabric assemblies constructed on site. Whilst testing materials in isolation provides a

logical and level comparison between products, it does not allow for dynamic effects, or build tolerances when different products are fixed together into systems.

- There are a number of Australian Standards currently referenced by the NCC as Acceptable Construction Manuals (ACMs) which include or reference testing requirements for products and/or labelling requirements. However industry is not sufficiently clear or aware of these obligations when using the Deemed to Satisfy pathway.
- Where a product is being proposed in an Alternative Solution, there is no guidance on the application of testing processes. Where they do exist under an ACM, they should be referenced.

Recommendations:

1.3.1 For mass-produced products – Testing required to ACCC Mandatory Safety Standards (where applicable), relevant Australian Standards and to equivalent or more onerous International Standards, where equivalence is based on:

- The accreditation status of the laboratory being appropriate for the test being conducted.
- Test conditions, specimen configuration and equipment being identified.
- Test duration being confirmed.
- Performance and test results being validated.

1.3.2 For mass-produced products that have been varied to a minor degree from a product that has been tested in accordance with Recommendation 3.1 above, they can only be certified where this variation is specifically assessed and documented.

1.3.3 Require all manufacturers to (including suppliers that market products as ‘own brand’) have an independently audited Quality Assurance system in place that is recognised in Australia and that as a minimum meets the following requirements:

- Testing or inspection of samples from the open market every 2-3 years (having passed completely through the supply chain and been subjected to all handling, transport and assembly stresses).
- Product labels/receipts to identify manufacturing date and specific manufacturing facility from where product is produced.
- Testing or inspection of samples from the factory/production facility.
- Regular and documented quality system audits.
- Independent assessment of the production process or service.

1.3.4 For mass-produced products – Regular random and independent sample testing is recommended in accordance with relevant Australian Standards (such as ISO IEC AS/NZS 17065) to ensure that production/manufacturing changes have not diminished the performance of the finished products compared to the original tested product.

1.3.5 For custom/site-specific products - Effective field screening tests are recommended.

1.3.6 Manufacturers of mass-produced products to undertake in-situ product and sub-assembly testing (with adjustments to allow for reasonable site tolerances and conditions) to confirm that the ‘as-built’ performance of products match or exceed their performance when tested in isolation.

1.3.7 All testing or certification bodies should be organisations able to demonstrate both product-specific technical capacity and testing or certification competence relevant to the product

being assessed. Such capacity and competence should be able to be independently confirmed.

1.3.8 The ABCB should establish and maintain a register of existing product testing obligations under relevant standards.

1.3.9 The ABCB should prepare guidance information for the use of alternative products as part of building solutions with reference to testing requirements where they exist.

1.4 Products Used in High-Risk Applications

Issues:

- The current focus by the ABCB and others on 'high-risk' product certification misses the major issue that is actually about conforming products that are used in inappropriate designs and forms of construction (non-compliant applications) or in high risk applications (e.g. structural supports, fire-proofing, water penetration, etc).
- There is no universally accepted means to identify, quantify and define what constitutes high risk in building products and it is problematic that such a definition could be usefully developed.

Recommendations:

1.4.1 Extend the current A2 provision's emphasis on product conformity to codes and standards, to include a concise and verifiable pathway to demonstrate that products are specified and used only for the purpose for which they are intended.

1.4.2 Adopt the BRANZ risk hierarchy of documentation (see: Using the Product Assurance Framework to Support Building Code Compliance – A Guide for Manufacturers and Suppliers of Building Products) as well as the New Zealand Building Performance - Product Assurance and MultiProof methodology.

1.4.3 For custom/site-specific products and systems a protocol is needed to support the building approval process. For products or designs where there is large risk to the community (including design event return periods for public, critical services, and post-disaster buildings), there is a need for a robust peer review process (where the independence of peers can be guaranteed) or an independent expert panel, to undertake or review the solution.

1.5 Innovation

Issues:

- There is a danger that higher A2 stringencies could become a barrier to product innovation, by inducing manufacturers to not develop new products, or develop less efficient and less innovative solutions that they know will pass the approval process rather than risk the time and cost developing more innovative concepts or products.

Recommendation:

1.5.1 All changes to the A2 provisions must be carefully reviewed to ensure that while they provide the necessary safety and performance standards required, they also foster the introduction and use of new products, technologies or techniques.

2. Recommended Aids for NCC A2 Compliance

2.1 Product Substitution

Issue:

- Product substitution is the primary pathway that leads to conforming products being used in situations where they do not comply with the requirements of the NCC.
- Product substitution may occur knowingly or unknowingly and may be undertaken by a number of parties to a building contract. Ultimately the building surveyor, the builder and the building designer have statutory obligations (in most Jurisdictions) that flow from the A2 provisions. However there is no guidance for these building professionals on the most appropriate way to manage legitimate product substitution.

Recommendation:

- 2.1.1 NCC changes to introduce a process that sets compliance controls on product substitution (using building products other than those specified) such that any substituted product must demonstrate that it is fit for the original purpose and still meets the NCC performance requirements. There is also scope for the process to articulate a requirement for approved building plan/working documents to show all substituted products as edited mark-ups against original specified/design products so these notes and substitutions are more readily visible for certifiers and clients to question. While the industry acknowledges that the NCC is not an enforceable regulatory document and applies only to the building design, there is considerable scope for it (or the ABCB) to articulate what product substitution methodologies would be appropriate to compliment the Evidence of Suitability rules. This would give each Jurisdiction guidance for their respective building regulations, as well as provide a logical linkage of post-build product verification processes for building surveyors to check.
- 2.1.2 The ABCB should develop education material around recommendation 2.1.1 above, in concert with key industry associations for builders, building surveyors and architects and building designers on how to manage product substitution before and during construction.

2.2 Anti-Gaming

Issues:

- Certification fraud is rapidly increasing with a growing number of fraudulent proprietary and certification documents appearing in the market. Modern digital scanning and printing technologies are making it easy to create authentic looking labels/certification, and making it almost impossible for consumers, contractors, builders and building surveyors to identify legitimate from illegitimate

product/manufacture claims. Also, while many overseas laboratories are testing to Australian Standards, some of their reports have also been found to be flawed.

- Building products can be difficult to identify once removed from their packaging and installed (thermal insulation materials for example).

Recommendations:

- 2.2.1 NCC provisions should contain business rules or controls for fraud detection and prevention. An example would be a requirement for all testing authorities that issue a report on a product, to publicly publish a 'Summary Information Report' (that documents salient results but protects manufacturer IP) and/or links to an online register. Another example would be the introduction of standardised product labels/receipts required for all overseas and local product suppliers to identify manufacturing date (and batch number if applicable) and specific manufacturing facility from where a product is manufactured. This will result in building certifiers being able to reconcile the documentation they receive from contractors and builders with independently verifiable information provided by the testing bodies (registered by NATA or ILAC equivalent).
- 2.2.2 Requirement for Product Information Sheets containing detailed performance labeling. Consider common performance labeling (including permanent etching/markings on products that cannot be removed) of third party product certification, with a link to trade licencing/accreditation to ensure that industry professionals/companies purchase compliant products. In situations where the nature of the material does not make it practical to be 'marked' (e.g. concrete), registration of a product should be reported on the website of the conformity assessment authority.
- 2.2.3 Requirement for a schedule of penalties, personal fines and criminal convictions where appropriate (as used in safety legislation) for manufacturers and importers of NCBPs, with proceeds from fines distributed to those entities that have invested in identifying and pursuing them.

2.3 Commissioning and Tuning

Issues:

- There is a clear and well documented understanding within the building industry that often what gets designed/specified for a building doesn't necessarily get used, or if used, is not necessarily installed correctly.
- Product suppliers have no control of the use of their products but there is an increasing incidence where the product supplier finds it is in their interests to monitor users' methodology, especially in instances of warranty and defect claims.

Recommendations:

- 2.3.1 NCC changes to include a specific requirement for building product commissioning and tuning, especially for custom/site-specific or Performance-based solutions. Such a requirement should also include a stipulation that product installers require recognised installer training and carry appropriate insurance cover for claims and injury. While the

industry acknowledges that the NCC is not an enforceable regulatory document in its own right (this is the role of each Jurisdiction's Building Act), there is considerable scope for it (or the ABCB) to articulate what commissioning and on-site testing regimes would be appropriate to compliment the Evidence of Suitability rules. This would give each Jurisdiction guidance for their respective building regulations, as well as provide a logical linkage of post-build verification processes for manufacturers to follow.

- 2.3.2** Concise, detailed and Plain English installation procedures should be a mandatory component of any Evidence of Suitability compliance documentation.

The Role of BPIC

The Building Products Innovation Council (BPIC) is a national peak body representing Australia's leading building products industries and related services in:

Steel	Gypsum Board	Concrete	Quantity Surveyors
Insulation	Timber Products	Roof Tiles	
Windows & Glass	Clay Bricks	Concrete Masonry	
Cement	Housing Industry	Insulated Panels	

BPIC's members and associated companies directly employ over 200,000 Australians with more than 470,000 employed indirectly. Their collective industries are worth over \$54B in annual production to the Australian economy. The Council is a not for profit organisation governed by a Board of Directors comprised of representatives from its member organisations.

The Council's primary objective is to provide coordinated representation of the building products industry to interested parties including Government, the construction industry, and the general public. We also provide a forum for discussion, information sharing and policy formulation among major product categories in the building industry.

BPIC's mission is to:

- Promote the efficient production and use of building products within a nationally consistent regulatory environment.
- Develop policy and make submissions or representations to governments, industry and the community on agreed technical standards, codes and regulatory issues of mutual concern to Members.
- Promote the innovative use of building products.

The Council works to fulfill these aims by gathering and supplying practical and current industry information on behalf of BPIC member organisations and other organisations and companies that are not members but follow BPIC through various means. This industry-wide approach to responding to regulatory issues, helps to ensure that Governments are informed of potential problems in the building industry and are provided with appropriate industry-considered responses.

BPIC also encourages investment in skills formation, product development and industry research by helping to identify and remove regulatory impediments to innovation. We commission research into technical codes, standards and regulations as well as matters of mutual interest to the building products industry, and promote the capabilities of the building products industry through industry-run forums, exhibitions and conventions.

Industry Endorsement

BPIC wishes to thank the following non-BPIC organisations for their input into this Industry Position Paper as well as their endorsement of it:

- Association of Wall and Ceiling Industries
- Bureau of Steel Manufacturers of Australia
- PrefabAUS

Contributions

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- Australian institute of Architects
- Bluescope
- CSR
- Engineers Australia
- Fire Protection Association Australia
- National Association of Steel-Framed Housing

Sources

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Procurement of Construction Products: A guide to achieving compliance - APCC Construction Product Quality Working Group 2014

Strategies to Address Risks Related to Non-Conforming Building Products – Australian Building Ministers' Forum – Senior Officers' Group 2016

The Quest for a Level Playing Field: The Non-Conforming Building Product Dilemma – The Australian Industry Group 2013

Using the Product Assurance Framework to support building code compliance - A guide for manufacturers and suppliers of building products - New Zealand Department of Building and Housing 2010

Attachment 1 – NCC Definitions

The following definitions contained in the 2016 NCC have been referenced throughout this paper and have been included to assist with the understanding of the issues discussed.

Alternative Solution	A Performance Solution
Appropriate Authority	The relevant authority with the statutory responsibility to determine the particular matter.
Certificate of Accreditation	A certificate issued by a State or Territory accreditation authority stating that the properties and performance of a building material or method of construction or design fulfill specific requirements of the BCA.
Certificate of Conformity	A certificate issued under the ABCB scheme for products and systems certification stating that the properties and performance of a building material or method of construction or design fulfill specific requirements of the BCA.
Deemed-to-Satisfy Provisions	Provisions which are deemed to satisfy the Performance Requirements.
Expert Judgement	The judgement of an expert who has the qualifications and experience to determine whether a Performance Solution or Deemed-to-Satisfy Solution complies with the Performance Requirements.
Fit for Purpose	Materials and construction being fit for the purpose for which they are intended including the provision of access for maintenance.
Performance Requirements	Requirement which states the level of performance which a Performance Solution or Deemed-to-Satisfy Solution must meet.
Performance Solution	A method of complying with the Performance Requirements other than by a Deemed-to-Satisfy Solution.

Professional Engineer

A person who is:

- (a) if legislation is applicable — a registered professional engineer in the relevant discipline who has appropriate experience and competence in the relevant field; or
- (b) if legislation is not applicable—
 - (i) a Corporate Member of the Institution of Engineers, Australia; or
 - (ii) eligible to become a Corporate Member of the Institution of Engineers, Australia, and has appropriate experience and competence in the relevant field.

Registered Testing Authority

- (a) an organisation registered by the National Association of Testing Authorities (NATA) to test in the relevant field; or
- (b) an organisation outside Australia registered by an authority recognised by NATA through a mutual recognition agreement; or
- (c) an organisation recognised as being a Registered Testing Authority under legislation at the time the test was undertaken.

Attachment 2 – NCC Evidence of Suitability (A2) Provisions

- (a) Subject to A2.3 and A2.4, evidence to support that the use of a material, form of construction or design meets a Performance Requirement or a Deemed-to-Satisfy Provision may be in the form of one or a combination of the following:
- (i) A report issued by a Registered Testing Authority, showing that the material or form of construction has been submitted to the tests listed in the report, and setting out the results of those tests and any other relevant information that demonstrates its suitability for use in the building.
 - (ii) A current Certificate of Conformity or a current Certificate of Accreditation.
 - (iii) A certificate from a professional engineer or other appropriately qualified person which—
 - (A) certifies that a material, design, or form of construction complies with the requirements of the BCA; and
 - (B) sets out the basis on which it is given and the extent to which relevant specifications, rules, codes of practice or other publications have been relied upon.
 - (iv) A current certificate issued by a product certification body that has been accredited by the Joint Accreditation System of Australia and New Zealand (JAS-ANZ).
 - (v) *****
 - (vi) Any other form of documentary evidence that correctly describes the properties and performance of the material or form of construction and adequately demonstrates its suitability for use in the building.
- (b) Evidence to support that a calculation method complies with an ABCB protocol may be in the form of one or a combination of the following:
- (i) A certificate from a professional engineer or other appropriately qualified person which—
 - (A) certifies that the calculation method complies with a relevant ABCB protocol; and
 - (B) sets out the basis on which it is given and the extent to which relevant specifications, rules, codes of practice and other publications have been relied upon.
 - (ii) Any other form of documentary evidence that correctly describes how the calculation method complies with a relevant ABCB protocol.
- (c) Any copy of documentary evidence submitted, must be a complete copy of the original report or document.