



What do I need to do to sell my building product in Australia?

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What do I need to do to
sell my product in
Australia?

That depends.... what
do you want to use it
for....*

* Which is not an answer, just
another question.



Focus on the Product or its Purpose

Product



Brick

17 References

Purpose

- Section B – Structural
- Section C – Fire
- Section F – Damp
- Section F – Weatherproofing
- Section F – Acoustics
- Section G – Bushfires
- Section H – Public buildings
- Section J – Thermal performance
- Section J – Building Sealing

Wall

1,024 References





What do I need to do to sell my product in Australia?

That depends.... what do you want to use it for....*

* Which is not an answer, just another question.

Conformity and compliance must include both the product and its intended purpose.



Today's Agenda

A different approach
to building product
conformity and
compliance

1. Conformity Assessment

And the bits that often get ignored

2. An Evaluation Approach

A new (old) way to approach building
products

3. Supply Chain Provenance

Understanding the supply chain and
ensuring access to the information
necessary to use the products in a
compliant manner



1: Conformity Assessment

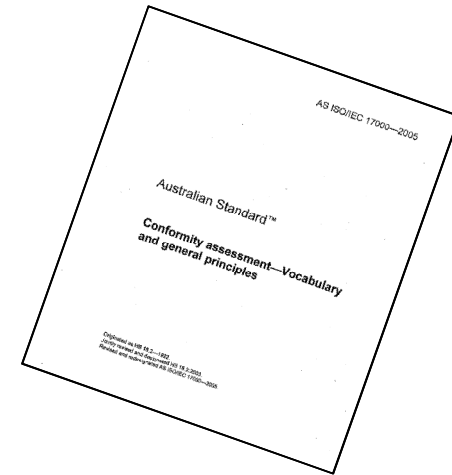
More than just product testing



Conformity Assessment

AS/ISO 17000

Definitions and general principles.



Conformity Assessment

A demonstration that specific requirements relating to a product, process, system, person or body are fulfilled

SELECTION

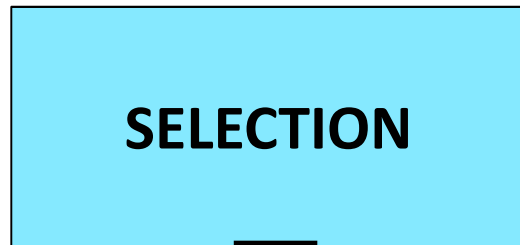
DETERMINATION

ATTESTATION



Conformity Assessment

Assessment Step



Selection of the specific requirements and planning the activities needed to demonstrate those requirements are fulfilled.

Activities to develop information regarding fulfilment of the specified requirements; includes sampling, testing and inspection

Review of the determination to deliver a statement of conformity in a form that most readily reaches all of the potential users

Output

Scope and test plan

Test reports

Statement of Conformity



Test Reports

DETERMINATION

Activities to develop information regarding fulfilment of the specified requirements; includes sampling, testing and inspection





Who made the selections?

SELECTION

Selection of the specific requirements and planning the activities needed to demonstrate those requirements are fulfilled.

**Evidence it meets a
standard**



**Evidence it is suitable
for a purpose**



Selections are Important

AS3786:2014

4.17 This requirement applies to the parts of the smoke alarm. It is considered that the access of all insects; however, it is considered that the access holes may introduce the danger of clogging by dust of the access holes may introduce the danger of clogging by dust be necessary to take other measures.

Optional function

4.18 Interconnectable smoke alarms—Optional function

If a means of connecting a number of smoke alarms to give a common alarm condition provided, the following shall apply:

- (a) The audible alarm condition shall be emitted by all of the interconnecting smoke alarms when smoke is detected by any of the interconnecting smoke alarms.
- (b) If the smoke alarms are provided with an alarm-silence facility, initiation of an alarm-silence period of one of the smoke alarms shall not prevent the audible alarm condition being emitted by that smoke alarm when smoke is detected by any other smoke alarm.
- (c) The interconnection of the maximum number of smoke alarms allowed shall not have an effect on the sensitivity of the smoke alarm or its ability to meet the battery capacity (see Clause 5.17) or sound requirements (see Clause 5.18).
- (d) Open- or short-circuits of the interconnecting leads shall either not prevent the smoke alarm from functioning individually or result in an alarm condition.

Evidence it meets a standard

Conforming

NCC2019 – Vol 2

3.7.5.2 Smoke alarm requirements

Smoke alarms must—

- (a) be located in—
 - (i) Class 1a buildings in accordance with 3.7.5.3 and 3.7.5.5; and
 - (ii) Class 1b buildings in accordance with 3.7.5.4 and 3.7.5.5.
- (b) comply with AS 3786, except that in a Class 10a *private garage* where there are multiple smoke alarms causing spurious signals, any other alarm deemed suitable in a private garage provided that smoke alarms complying with AS 3786 are installed elsewhere.
- (c) be powered from the consumer mains source where a consumer mains source is available.
- (d) be interconnected where there is more than one alarm.

Evidence it is suitable for a purpose

Complying

Versus



Findings from VCAT's Lacrosse Decision

Quotes from Judge
Woodward's findings

... there may be features of the material or aspects of its proposed installation that would lead a building surveyor to conclude that a test certificate based on a small test specimen of the material is not sufficient to justify approval.

VCAT BP350/2016 – ¶1345

...wrongly relied on the...test certificate alone as a sufficient basis for determining that the... specification was suitable.

VCAT BP350/2016 – ¶1349



Findings from VCAT's Lacrosse Decision

Quotes from Judge
Woodward's findings

... a building surveyor may need to go further than the information about the material provided by one or more of the documents identified in A2.2(a).

VCAT BP350/2016 – ¶1345

A2.2 is not intended to operate as a fixed checklist of pre-requisites to compliance, where satisfaction of any one them effectively guarantees approval.

VCAT BP350/2016 – ¶1344



2: An Evaluation Approach

Overview of the Australian Technology Evaluation Network

Adding procedures to the steps in conformity evaluation

SELECTION

DETERMINATION

ATTESTATION



A broader approach to product evaluation isn't new to Australia

Previous schemes have captured details of a product and its intended purpose





Australian Technical Evaluation Network (ATEN)

Scoping study led by Swinburne University.

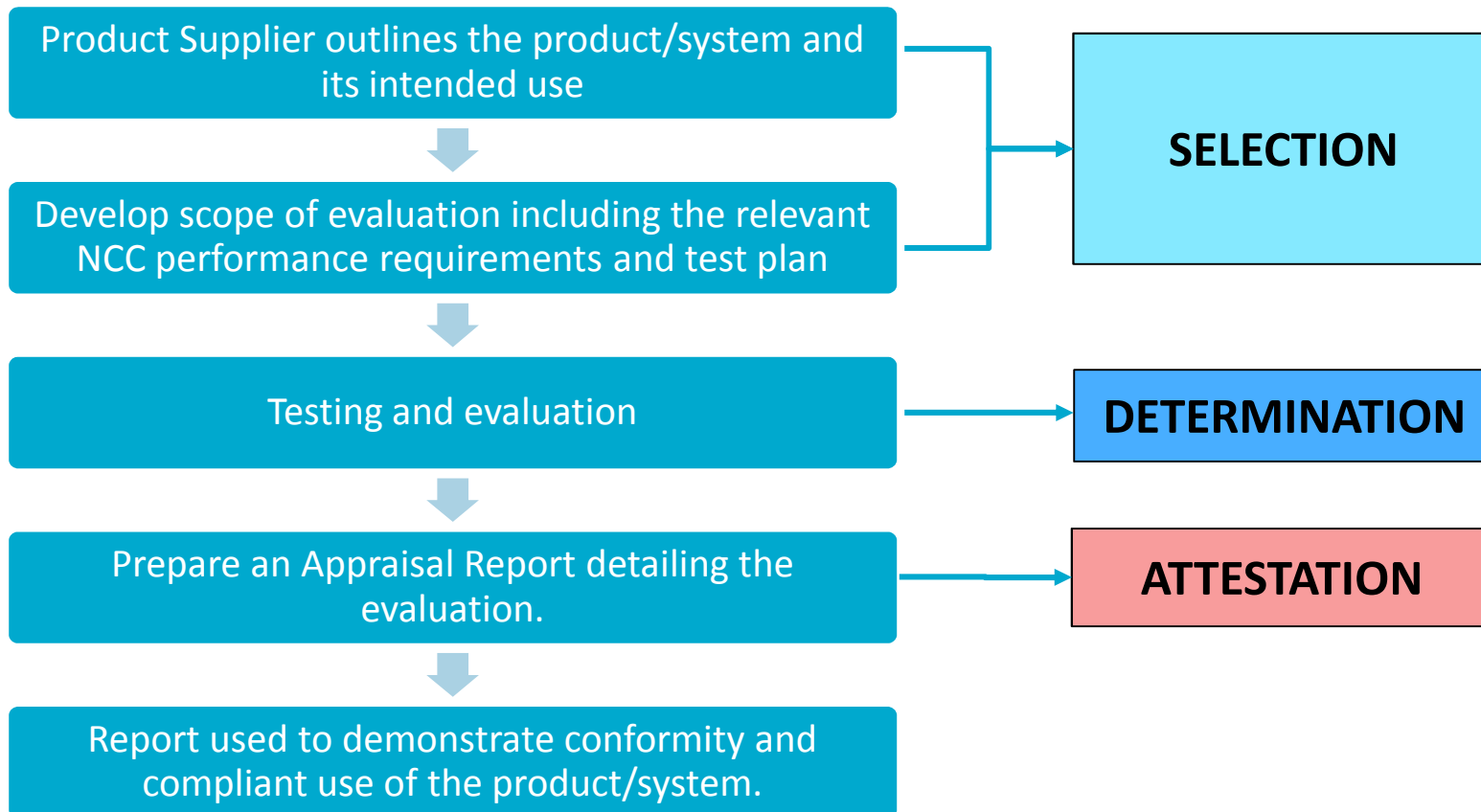
Funded by Victorian Government

www.swinburne.edu.au/aten





Steps in the ATEN Process





Steps in the Process

SELECTION

Develop scope of evaluation including the relevant NCC performance requirements and test plan



Managing Complexity



Brick

17 References



Wall

1,024 References

- Section B – Structural
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Managing Complexity

Network (The N in ATEN)

- The scope of each evaluation will be developed by a working group of experts.
- This group is drawn from the ATEN Network; a group of independent subject matter experts.
- Working group selection is based on the particular aspects of product/purpose to be evaluated.



Operating Details

- Available from ATEN Website at www.swinburne.edu.au/aten
- Background, proposed rules, report templates and international comparisons





Digitally Enabled

- Build a database to ensure consistency and coherence of future product evaluation.

- Capture the Network's deliberations and outcomes
- Build into an expert system to inform future decisions
- Provide empirical data to inform regulatory decisions and future NCC DtS provisions



Recommendations

Selected recommendations
from recent inquiries and
reports

Senate Inquiry – Dec 2018

Calls on BMF to expedite consideration of a mandatory third party certification scheme for high risk building products.

[for high risk goods], the importer, prior to importation, conduct sampling and testing by a NATA accredited authority.

Senior Officers Group (2016)

Note the value and importance of existing building industry initiatives, such as industry third party certification schemes, in identifying instances of building product non-conformity

Building Confidence Report (2018)

...prohibitions against the installation of high-risk building products that are not certified.



3: Supply Chain Provenance

Translating product evaluation into practice

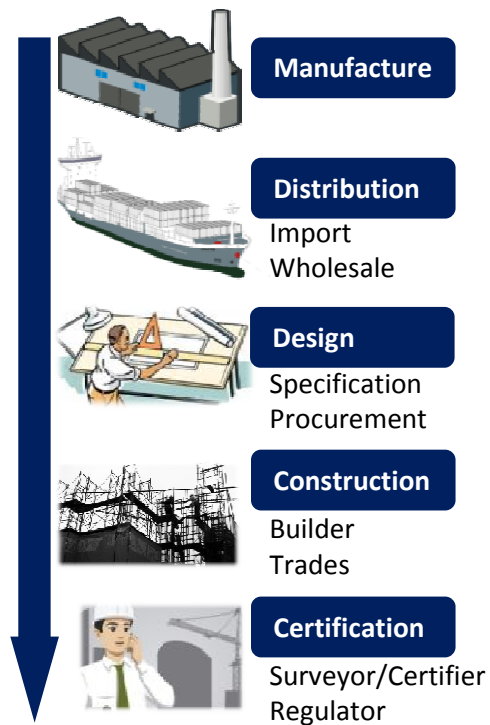


Evaluation is only half the Job

- Conformity evaluation systems (and laboratory testing) confirm that a design can deliver a compliant solution
- They don't confirm that the product/system as manufactured and supplied will conform.
- Nor that they will be used in a compliant manner



Supply Chain Provenance



- Product Identification
- Labelling
- Tracking and Traceability
- National register of compliant products



Modes of Non-Compliance

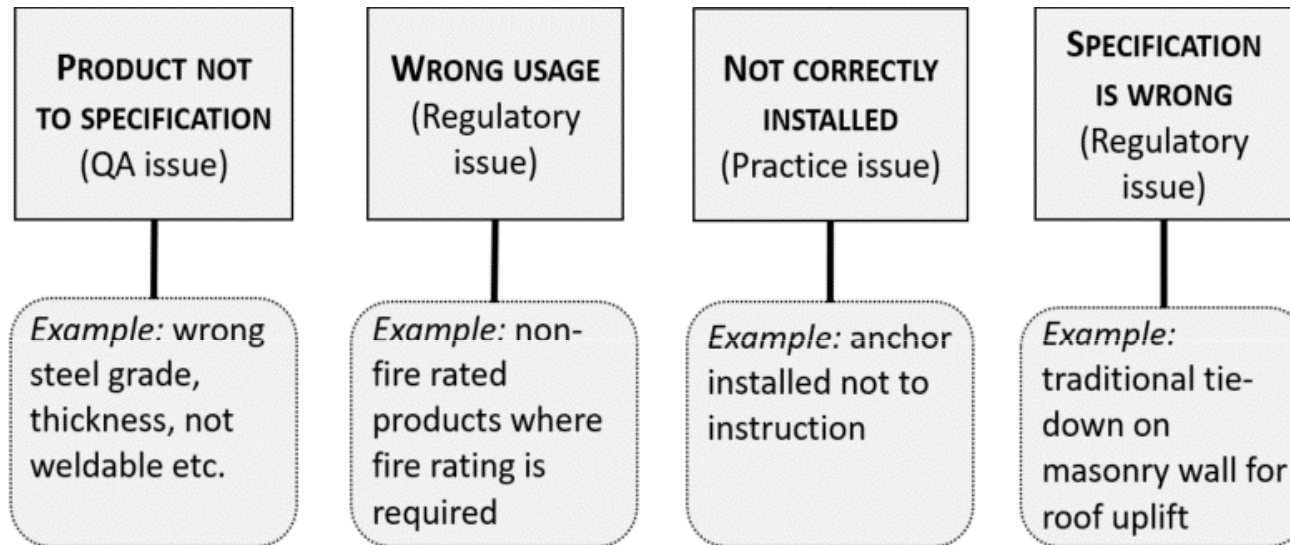
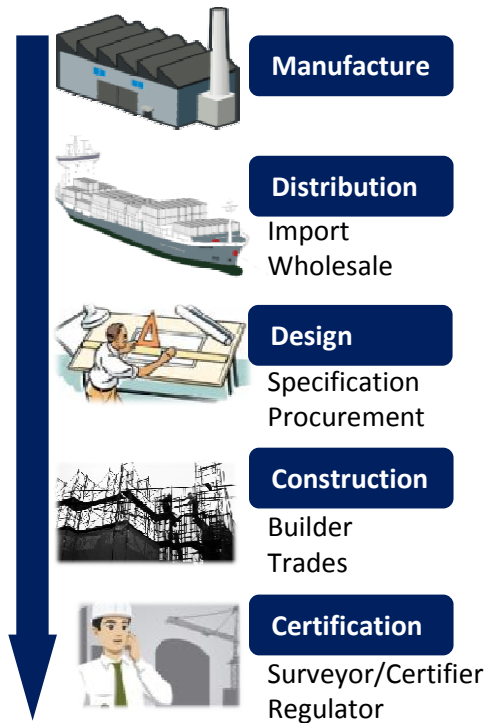


Diagram from ATEN (2019)

Many relate to an information problem



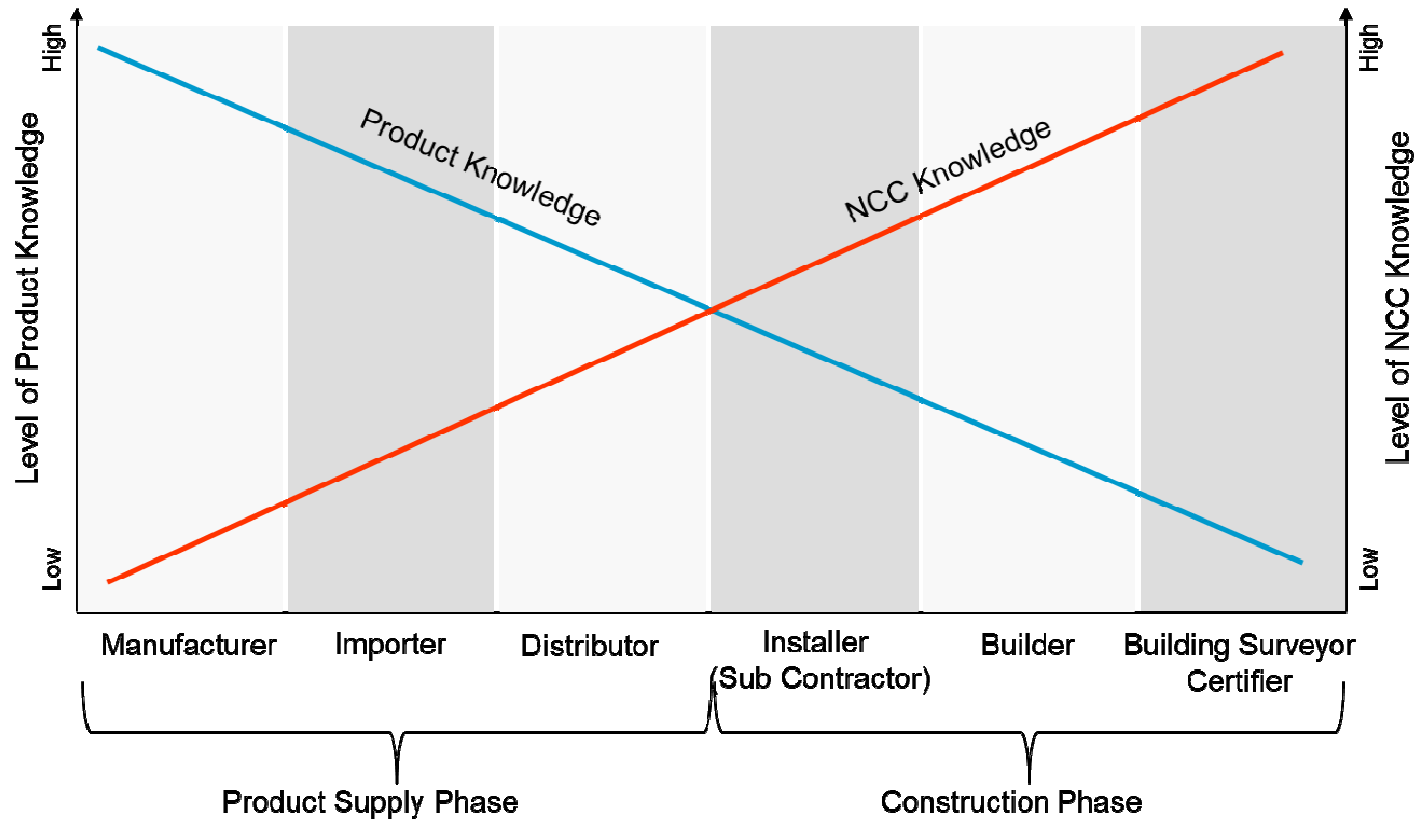
Information



ISO 17000:
Deliver a statement of
conformity in a form
that most readily
reaches all of the
potential users

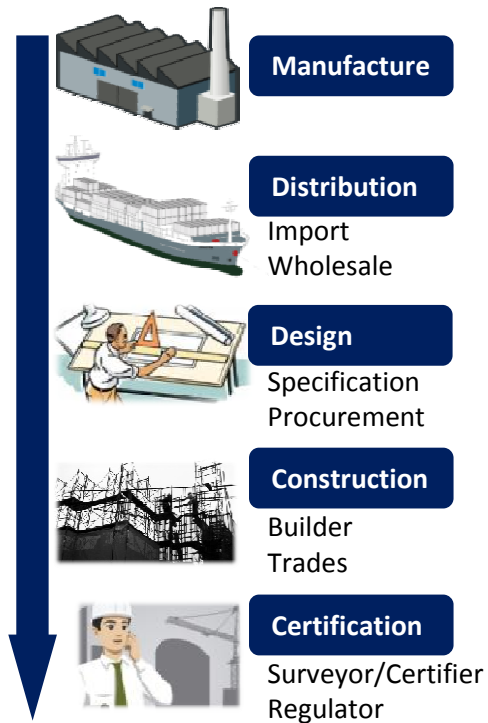


Most Readily Reaches Potential Users





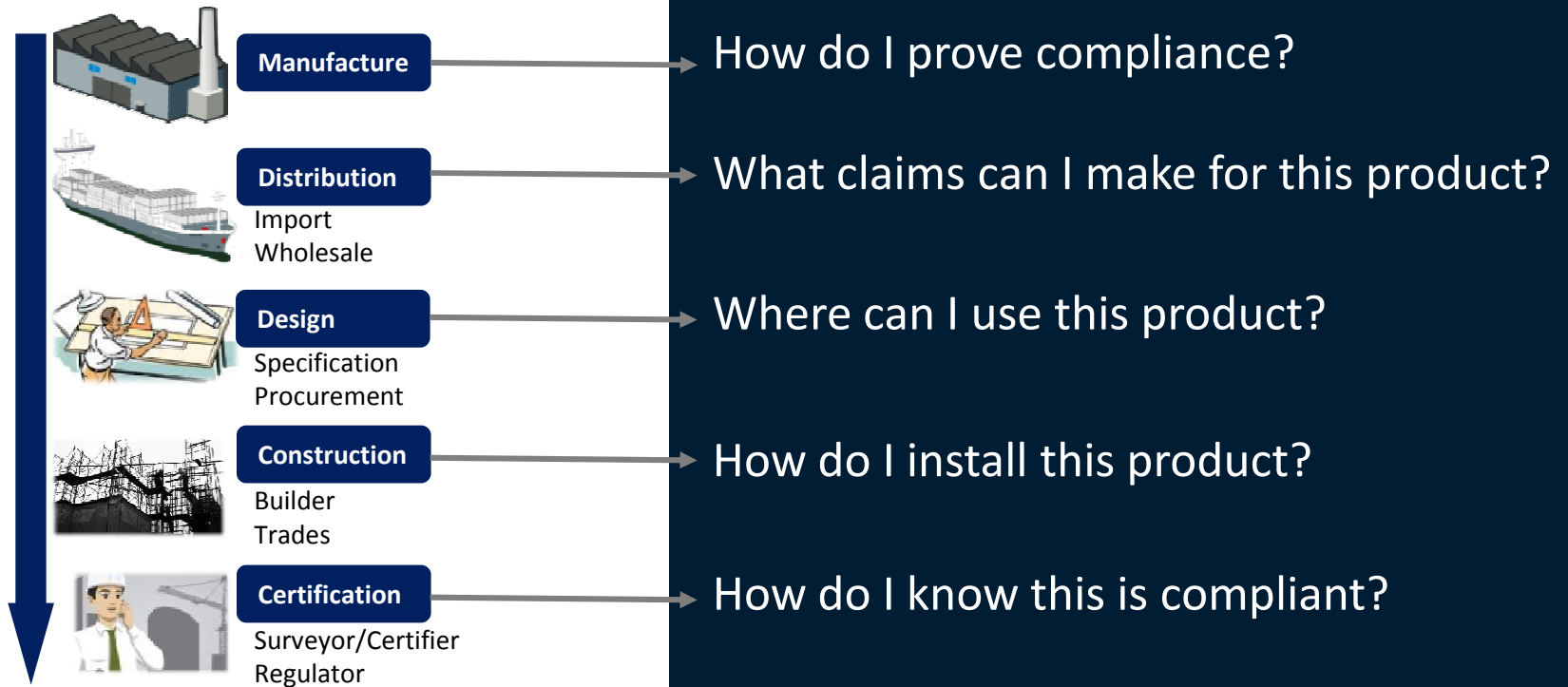
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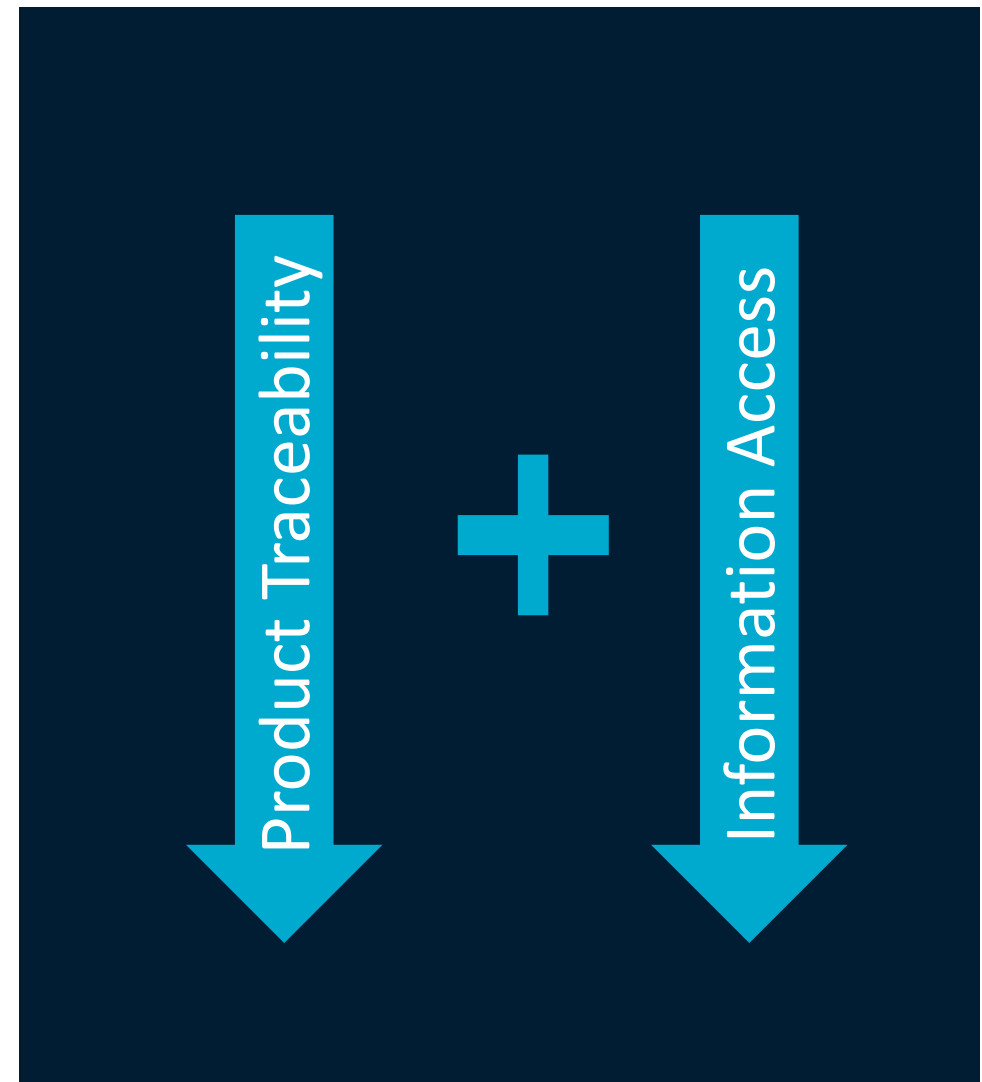
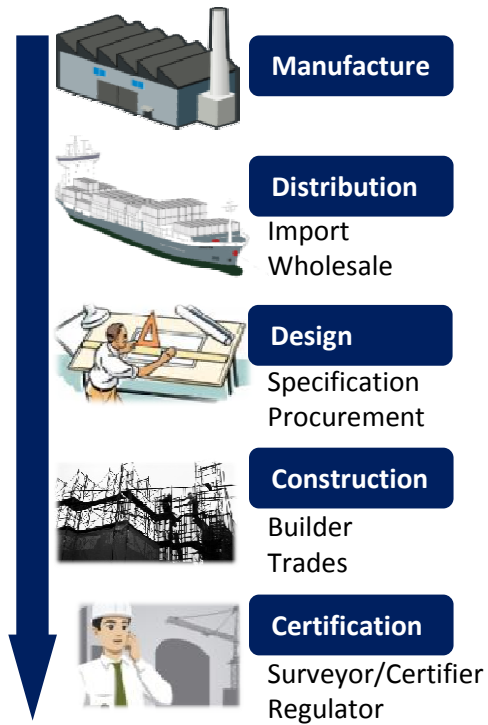


Information Demand



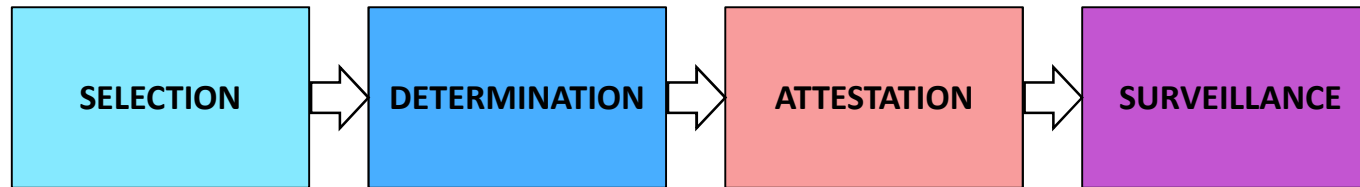


Provenance





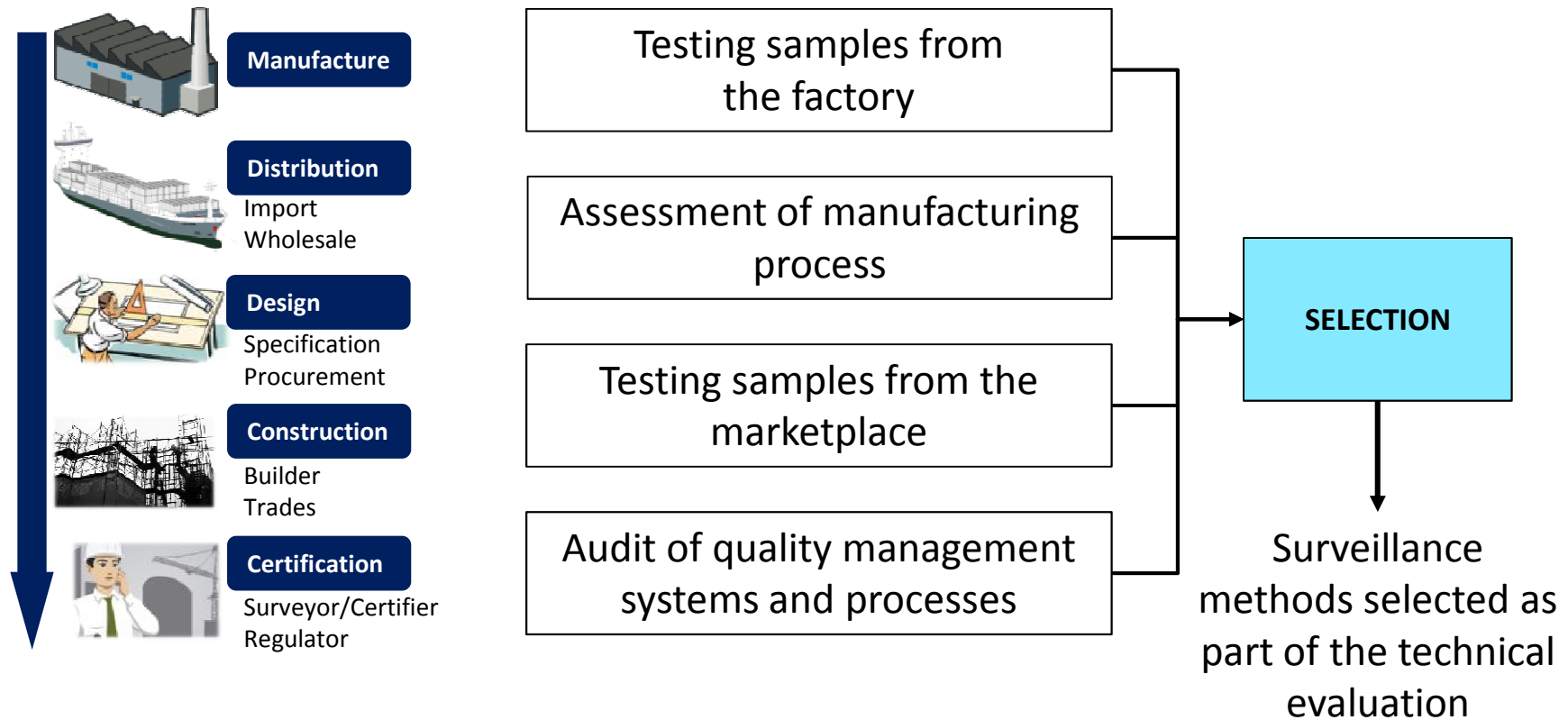
A note on surveillance



- Surveillance is a function under ISO17000
- It is included (in some degree) in most certification schemes.
- Systematic iteration of the previous functions in order to maintain validity of the 'statement of conformity'.



Surveillance is a technical decision





4: Summing Up



What do I need to do to
sell my product in
Australia?

That depends.... what
do you want to use it
for....



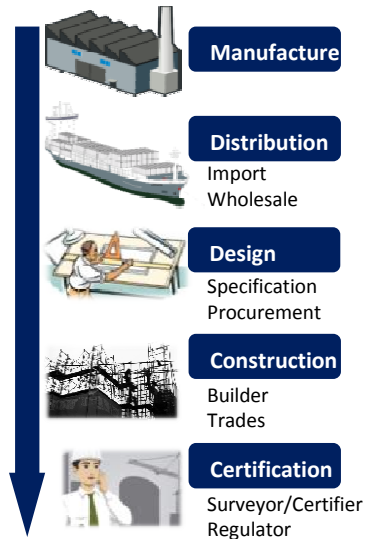
What do I need to do to sell my product in Australia?

Undertake an evaluation which combines product and purpose.





What do I need to do to sell my product in Australia?



...and provides conformity evaluation information in a form that readily reaches all parts of the supply chain





Thank you

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Australia's National Science Agency

For additional information on conformity evaluation or the Australian Technical Evaluation Network, please contact the CSIRO or Swinburne University