

04 September 2025

Australian Government  
Productivity Commission

**Re: National Competition Policy 2025 Review – Interim Report**

To whom it may concern

The Plastics Industry Pipe Association of Australia (PIPA) is the peak industry body representing manufacturers and suppliers of plastic pipes and fittings in Australia. Our industry plays a critical role in infrastructure, building, water, gas, and energy sectors, with long-standing commitments to safety, performance, and sustainability.

We welcome the opportunity to contribute to the National Competition Policy 2025 Interim Report review. We welcomed the chance to present our views in our earlier submission, and I wish to take this opportunity to reinforce those key points while also providing additional comment on the current review focus.

**Support for harmonisation** – We strongly support greater harmonisation of Australian Standards with international and overseas standards where this can reduce regulatory burden and deliver efficiencies.

**Australia's right to adapt standards** – The plastic pipe industry already adopts many ISO and other international standards, but these are rarely adopted “as-is.” Modifications are often required to reflect:

- Australian climatic and environmental conditions (e.g. UV exposure, bushfire risk)
- National safety expectations
- Local water and gas authority requirements
- Construction and installation practices
- Product lifespan and durability needs

Automatic adoption of international standards without proper assessment and local adaptation would risk the integrity and performance of critical infrastructure systems. International standards may be considered for direct adoption, modified adoption, or technical alignment — but only after rigorous review and validation to ensure they are fit-for-purpose in the Australian context. This process ensures that standards support not only global best practice but also the unique demands of Australia's regulatory, environmental, and operational landscape.

**Consistency and fairness in regulatory adoption** – If international standards are to be incorporated into regulation, they must be subject to the same rigorous consultation, stakeholder validation, transparency requirements, and periodic review mechanisms as Australian standards. It would be inappropriate and inequitable to allow overseas-developed documents into regulation without comparable scrutiny.

**Existing international alignment** – Our industry already has a high degree of alignment with ISO and EN standards. For example:

- ISO 16422 (PVC-O pipes and joints)
- ISO 4427 (PE piping systems for water supply and pressure drainage/sewerage)
- EN 12201 (PE piping systems for water supply and pressure drainage/sewerage)

These standards are routinely considered in developing AS/NZS standards, but only after careful review and consensus by committees that include engineers, utilities, regulators, and manufacturers. This ensures they are technically robust, locally relevant, and supported by expert consensus.

**Scrutiny of deviations** – We acknowledge the importance of applying greater scrutiny to deviations from international standards and embedding a mandate to also consider overseas standards where appropriate.

**Avoiding parallel systems** – We caution against directing regulators to undertake reviews or processes outside the established standards framework. Creating parallel systems risks undermining national consistency, bypassing Australia's transparent, consensus-driven process, and weakening trust in the system by sidelining expert input.

**Access to mandated standards** – We support exploring options for government-funded access to mandated standards. However, this is a complex issue that requires careful modelling, particularly given the cross-subsidisation model that underpins standards development in Australia.

**National consistency, transparency, consultation** – Above all, reforms must continue to reinforce the principles of consultation, national consistency, and transparency in the adoption of standards. These principles are essential to maintaining confidence in the system and ensuring standards remain fit-for-purpose in Australia's unique regulatory and environmental context.

The plastic pipe industry demonstrates that international alignment is both possible and already occurring — but only when guided by rigorous review, expert consensus, and local adaptation. We encourage reforms that build upon this proven approach, ensuring that Australia's standards system continues to protect quality, safety, and public interest while also supporting productivity and competitiveness.

Thank you again for the opportunity to contribute to this important review.

Kind Regards

Cindy Bray  
**Executive General Manager**