Submission to the Productivity Commission

National Competition Policy analysis 2025

From: Australian Cablemakers Association Limited (ACA)
Contact:

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Executive Summary:

The Australian Cablemakers Association (ACA) advocates for reducing unnecessary regulatory burdens and enhancing competition when clear net benefits exist. However, we firmly oppose the indiscriminate, rapid replacement of bespoke Australian standards with overseas alternatives without comprehensive, evidence-based technical and economic assessments. Many tailored standards in the electrical contracting and cabling sectors in Australia incorporate safety, durability, and performance requirements attuned to the unique demands of Australia's climate, installation practices, and network architecture. Overlooking these considerations could lead to safety failures, increased long-term costs, supply chain disruptions, and a loss of local expertise.

About the ACA:

The ACA represents manufacturers within the Australian cable industry. Our members supply cable products for residential, commercial, industrial, and utility installations nationwide and actively engage in standards development, testing, and regulatory compliance. We provide regulators with technical evidence concerning product safety and suitability for Australian conditions.

Context and Concerns:

The Productivity Commission's interim report identifies 675 bespoke Australian standards for potential review. Numerous standards are referenced in legislation, licensing instruments, building codes, and procurement specifications. In the electrical and cabling sectors, these standards are crucial for licenses, product certification, inspection regimes, procurement, liabilities, and insurance. Replacing these standards without a disciplined, evidence-based approach could result in safety risks, substantial transition costs, and unintended negative impacts on consumers and the industry.

Illustrative Examples Supporting Our Concern:

1. **AS/NZS 3000:2018 — Electrical Installations (Wiring Rules)**
    - **Role:** This primary standard governs the design, installation, and verification of electrical installations in Australia and New Zealand. It is essential for electricians, inspectors, network operators, and building regulators daily.
    - **Specific Concerns with Substitution:** Differences in earthing/bonding practices, RCD requirements, protective device coordination, and clearance conventions between AS/NZS 3000 and overseas standards need thorough assessment. Transitioning without careful planning might necessitate broad retraining, adjustments to licensing and inspection frameworks, and revisions to contract and procurement documents. This could erode safety margins and inflate compliance costs.
2. **AS/NZS 5000.1:2005 — Electric Cables, Polymeric Insulated, up to 0.6/1 (1.2) kV**
    - **Role:** This standard, and other similar Australian standards, detail the construction, material, and performance requirements for common electrical cables used in industrial and large building installations, with specific provisions reflecting Australian ambient temperatures and flame/aging performance.
    - **Lessons from Practice:** The Infinity Cables mandatory recall illustrates the practical risk of importing cables that likely conformed to an overseas standard but proved unsuitable for Australian conditions. The ACA provided evidence to NSW Fair Trading, indicating these imported products were prone to premature and unsafe failure in service. Subsequently, the ACCC issued a mandatory recall of all Infinity brand cables, highlighting the safety and reputational risks of uncritical adoption of overseas standards.
    - **Other Considerations:** Australia's unique environment, characterized by high ambient temperatures and harsh conditions, necessitates cable materials that maintain flexibility under prolonged exposure to heat. This is how the Infinity cable manufactured with inferior performance materials failed and became dangerous. Additionally, the standard includes provisions to protect against uniquely Australian risks, such as termite damage, typically not a requirement in overseas developed standards.

Summary:

Bespoke Australian standards have evolved over many years to ensure high levels of safety, technical compliance, and interoperability. While it is possible for overseas standards to substitute locally developed ones, such transitions should only proceed after rigorous technical assessments and comprehensive cost-benefit analyses have been conducted.

We thank you for your time to read this submission.