

15 June 2026

Submission to the Productivity Commission from Plumbing Products Industry Group (PPI Group)

Prepared by: Nick Tripp - CEO | Executive Director, PPI Group

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Confidentiality: Public Submission

Plumbing products are essential housing-enabling inputs. The reform task is to make compliant housing delivery faster, clearer and more nationally consistent - not less compliant.

1. Executive Summary

PPI Group welcomes the opportunity to provide this submission to the Productivity Commission inquiry into housing supply regulation.

PPI Group is the peak industry body representing participants across the estimated \$8 billion plumbing products market in Australia and New Zealand. Our members include manufacturers, importers, suppliers, wholesalers, retailers and related industry participants involved in the supply of plumbing products used across residential, commercial, industrial and public infrastructure projects.

The plumbing products sector is an essential part of the housing supply chain. Every new dwelling requires compliant products and systems for potable water, sanitation, drainage, stormwater, backflow prevention, hot water, fixtures, fittings and related infrastructure. No home can be safely occupied without these systems being designed, supplied, installed, inspected and certified correctly.

PPI Group supports practical regulatory reform that improves housing delivery, reduces unnecessary duplication and increases construction productivity. However, the key policy distinction is critical: governments should streamline the process of demonstrating compliance, not weaken the standards that protect public health, consumer protection, water safety and long-term building performance.

This submission is framed in accordance with the Productivity Commission call paper. It focuses on the inquiry areas most relevant to PPI Group: approval processes, post-approval and certification requirements, and the processes and frameworks required to deliver and use housing-enabling infrastructure. PPI Group does not seek to use this inquiry as a general National Construction Code reform submission.

The NCC is out of scope for this inquiry, and PPI Group has kept this submission directed to approval burden, regulatory coordination, infrastructure readiness and the interface between compliant plumbing products and housing delivery.

PPI Group recommends that governments prioritise reforms that:

- Make plumbing-related product compliance and certification evidence easier to recognise and rely on across jurisdictions;
- Reduce duplicated documentation requests across planning, building, utility, certifier and post-approval processes;
- Improve early coordination of water, sewerage, stormwater and related infrastructure requirements;
- Support risk-based fast-track approval pathways only where compliance is clear, repeatable and well-evidenced;
- Preserve inspection integrity, certification accountability and enforcement capability;
- Strengthen action against non-compliant products and installations that distort the market and create downstream defects;
- Treat plumbing products and plumbing-related infrastructure as core housing-enabling inputs; and
- Engage product sector expertise in the design of housing supply regulatory reforms.
- The central principle is simple: more homes should be delivered faster, but not by accepting weaker compliance, lower quality or higher downstream rectification risk.

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2. About PPI Group

PPI Group is the peak industry body representing participants across the estimated \$8 billion plumbing products market in Australia and New Zealand.

PPI Group members supply the products, systems and technical capability that support safe, reliable and compliant water, sanitary, drainage and related plumbing infrastructure in residential, commercial and public buildings.

The sector represented by PPI Group sits at the intersection of product manufacturing, importation, certification, distribution, specification, installation, inspection and building occupation. This gives PPI Group a practical interest in how regulatory systems affect housing delivery at both the front end and the completion end of the construction process.

PPI Group supports the objective of increasing housing supply. Australia needs more homes, delivered more efficiently, in locations where people need them. However, housing supply reform must not be pursued in a way that weakens essential safeguards for product compliance, plumbing system performance, public health, consumer protection or building quality.

The central principle is: more homes should be delivered faster, but not by accepting weaker compliance, lower quality or higher downstream rectification risk.

3. Alignment with the Productivity Commission inquiry scope

The Productivity Commission call paper identifies three core areas of focus: approval processes; availability and use of land for housing; and processes and frameworks to deliver new and use existing housing-enabling infrastructure.

PPI Group makes this submission primarily in relation to the first and third of those areas. The plumbing products sector has direct practical experience with approval processes, building and post-approval documentation, infrastructure connection requirements, inspection and certification, and the compliance evidence required to take a dwelling from design to occupation.

PPI Group is not a planning or land-use specialist body. Accordingly, this submission does not seek to provide detailed reform proposals on zoning, land release or density controls. However, PPI Group notes that land can be zoned and released for housing yet still fail to deliver timely new homes if water, sewerage, drainage, stormwater and related housing-enabling infrastructure are not planned, approved and coordinated early enough.

PPI Group also notes that the National Construction Code is out of scope for the inquiry. This submission therefore does not recommend changes to the NCC itself. It focuses instead on how governments can reduce regulatory burden in the process of proving, recognising and administering compliance without compromising the underlying regulatory objectives.

PC information request	PPI Group response focus
1. Which regulatory reforms should governments prioritise?	Prioritise reforms that reduce duplicated approval and compliance processes, improve national consistency, and bring water, sewerage, drainage and plumbing product requirements into housing supply reform design.
2. Which approval steps are most onerous, time consuming and costly?	Post-approval documentation, repeated compliance evidence requests, infrastructure approvals, utility/certifier coordination and final occupation/certification stages can create avoidable delay where roles and evidence requirements are inconsistent.
3. Which recent reforms to approvals are most and least effective?	Fast-track pathways and coordination bodies can assist where they are risk-based and properly resourced. They are ineffective where they simply reduce scrutiny or move bottlenecks to later inspection and occupation stages.
4 and 5. Zoning, land-use controls and land release	PPI Group does not provide detailed zoning recommendations, but notes that land release must be coordinated with water, sewerage, stormwater and related infrastructure capacity.
6 and 7. Development contributions and housing-enabling infrastructure	Water, sewerage, stormwater, drainage and related plumbing infrastructure are basic housing-enabling infrastructure. Reform should reduce uncertainty, improve early resolution of requirements and ensure infrastructure approvals support timely housing delivery.

4. Plumbing products are essential housing-enabling inputs

Plumbing products are an essential part of every residential build. No dwelling can be completed, occupied or safely used without compliant products and systems for water supply, sanitation, drainage, backflow prevention, hot water, fixtures, fittings and related infrastructure.

For this reason, plumbing product regulation should not be viewed as a narrow technical matter sitting at the edge of housing policy. It is directly connected to housing delivery, construction productivity, building quality, public health, consumer protection and long-term asset performance.

Every new home depends on a chain of compliant plumbing products being designed, specified, supplied, installed, inspected and certified correctly. If any part of that chain is unclear, inconsistent, delayed or poorly enforced, the result can be project delay, rework, additional cost, non-compliant installation, consumer harm or later rectification.

PPI Group therefore encourages the Productivity Commission to treat plumbing products and plumbing-related infrastructure as core housing supply enablers.

A faster housing system requires:

- Clear and nationally consistent product compliance pathways;
- Efficient recognition of compliant plumbing products and associated evidence;
- Consistent interpretation by regulators, certifiers, approval bodies and utilities;
- Strong enforcement against non-compliant products and installations;
- Early coordination of water, sanitary, drainage, stormwater and related infrastructure requirements; and
- Approval processes that reduce duplication without weakening essential safeguards.

In short, plumbing products are not optional finishes. They are fundamental components of safe, functional and occupiable housing.

5. Streamline the process, not the standard

PPI Group supports regulatory simplification where it removes unnecessary process, duplicated paperwork, inconsistent interpretation and avoidable delay. However, simplification must not be interpreted as reduced scrutiny of critical systems or reduced accountability for compliance.

Member feedback to PPI Group has highlighted a concern that non-compliance remains a real issue across parts of the plumbing and building industry. That concern should not be dismissed as resistance to reform. It reflects a practical risk: if governments seek higher construction volumes without maintaining adequate compliance capability, inspection integrity and enforcement, defects and rectification costs will increase.

The housing system needs to deliver correctly and consistently before it attempts to deliver faster at scale. Speed is not productivity if the result is avoidable rework, delayed occupation, consumer harm or premature failure of essential systems.

PPI Group therefore proposes a balanced reform position: remove unnecessary regulatory friction, but preserve the core compliance safeguards that ensure homes are safe, durable, functional and fit for occupation.

6. Response to information request 1 - reforms governments should prioritise

PPI Group recommends that governments prioritise the following reforms to support faster housing delivery while preserving regulatory objectives.

Priority reform	Why it matters for housing supply
Nationally consistent recognition of plumbing product compliance evidence	A product that has already demonstrated compliance should not face materially different administrative evidence expectations in different jurisdictions or approval channels. Consistency reduces uncertainty and accelerates specification, procurement and certification.
Fast-track compliance pathway for new product development and innovation	New plumbing products, materials and system designs that can demonstrate compliance should have a clear, risk-based fast-track assessment pathway. Housing supply reform should not unintentionally slow innovation by forcing new compliant products through duplicated, unclear or unnecessarily slow approval processes. A faster pathway for genuinely compliant new products would support improved housing productivity, reduce delays in bringing better solutions to market, and give builders, designers and specifiers greater confidence to adopt innovative plumbing products and systems.
Early resolution of plumbing and infrastructure requirements	Water, sewerage, stormwater, drainage and connection requirements should be resolved early enough to avoid late redesign, delayed permits, delayed occupation or unexpected cost escalation.
Risk-based fast-track pathways for repeatable compliant work	Fast-track pathways should be available for low-risk, repeatable and clearly compliant housing work, including standardised product and system configurations. They should not be blanket exemptions from competent assessment.
Inspection and certification integrity	Faster approval should not mean fewer meaningful checks of essential systems. Inspection and certification protect consumers and reduce downstream defect costs.
Stronger enforcement against non-compliance	Non-compliant products and installations distort the market, undermine compliant suppliers and create future housing quality problems. Reform should improve enforcement, not weaken it.
Product sector representation in reform design	Product manufacturers and suppliers understand compliance evidence, supply constraints, substitution risks and practical implementation issues. Their expertise should be included in reform design.

7. Response to information request 2 - approval steps that are onerous, time consuming and costly

From PPI Group's perspective, the burden in housing approval processes often arises not from the existence of compliance obligations themselves, but from fragmented administration of those obligations.

For plumbing products and systems, a developer, builder, designer, plumber, supplier or certifier may need to satisfy different parties at different points in the process, including planning authorities, building surveyors, hydraulic consultants, utilities, plumbers, inspectors and post-approval certification bodies. Where those parties apply different documentation expectations or interpret requirements differently, compliant work can be delayed even where the underlying technical issue is not complex.

The Commission has specifically asked how burden can be reduced without compromising regulatory objectives. PPI Group supports that framing. The focus should be on reducing process burden while preserving the purpose of the regulation.

The approval burdens most relevant to PPI Group include:

- Repeated product compliance evidence requests - the same compliance evidence may be requested multiple times by different parties in different formats.
- Inconsistent interpretation - product or installation requirements may be interpreted differently across jurisdictions, local authorities, utilities, certifiers or inspectors.
- Late-stage infrastructure or connection issues - water, sewerage, drainage or stormwater matters can emerge too late in a project, causing redesign, delay or additional cost.
- Unclear post-approval conditions - conditions imposed after development or building approval can create uncertainty if they do not clearly identify the evidence required to satisfy them.
- Occupation-stage bottlenecks - if plumbing compliance documentation or inspection issues are not resolved progressively, they can delay the point at which a dwelling is certified as fit for occupation.
- Substitution risk - cost and timing pressure can increase the risk of product substitution, including substitution away from compliant products to cheaper or poorly evidenced alternatives.

PPI Group recommends that governments reduce this burden through standardised evidence requirements, shared digital compliance records, clearer role allocation between regulators and certifiers, and earlier coordination of infrastructure requirements.

8. Response to information request 3 - recent approval reform approaches

PPI Group supports reform mechanisms such as fast-track pathways, coordination bodies, standardised approval documentation and digital tools where they are used to reduce avoidable process delay. These mechanisms can improve housing supply if they create earlier certainty and reduce duplication.

However, PPI Group cautions that such reforms are only effective where they preserve competent assessment of essential systems. A fast-track pathway that simply reduces scrutiny may create a false productivity gain by moving risk downstream to inspection, rectification, warranty dispute or consumer harm.

The best approval reforms are those that distinguish between low-risk repeatable work and higher-risk or novel work. Standardised housing designs, proven compliant products, repeatable installation systems and well-evidenced infrastructure solutions are appropriate candidates for accelerated pathways. Poorly evidenced products, unusual site conditions, complex hydraulic design or unresolved infrastructure constraints should not be pushed through simplified processes without adequate review.

PPI Group considers approval reforms most likely to be effective when they:

- Provide a single point of coordination for complex approval issues;
- Allow earlier identification of water, sewerage, drainage and stormwater constraints;
- Provide standard documentation templates for product and system compliance evidence;
- Support digital lodgement and tracking of approvals, conditions and outstanding evidence;
- Distinguish clearly between process streamlining and compliance relaxation;
- Retain meaningful inspection and certification steps for essential systems; and
- Measure results not only by approval speed, but also by defects, rework, occupation delays and compliance outcomes.

9. Response to information requests 4 and 5 - land use and land release

PPI Group does not propose detailed reforms to zoning, density controls, heritage controls, land release or subdivision policy. Those matters are more appropriately addressed by planning, development, local government and housing bodies.

However, PPI Group emphasises that land release and planning reform should not be treated as complete unless the released land can be serviced by essential infrastructure. A site may be made available for residential use but still fail to produce timely housing if water, sewerage, stormwater and related infrastructure approvals, connections and capacity issues are unresolved.

Accordingly, land release arrangements should be integrated with early infrastructure capacity assessment. Where land is being prioritised for housing supply, governments should ensure that basic infrastructure requirements are identified, sequenced and funded in a way that does not transfer uncertainty to later development, building approval or occupation stages.

10. Response to information requests 6 and 7 - housing-enabling infrastructure

PPI Group strongly supports the Productivity Commission's inclusion of housing-enabling infrastructure within the inquiry scope. Water, sewerage, stormwater, drainage and related plumbing systems are basic housing-enabling infrastructure. They are not optional amenities. They determine whether a dwelling can be made functional, safe and occupiable.

Poor infrastructure planning or poor coordination between infrastructure providers, approval bodies, builders and certifiers can create delay, uncertainty and cost. This can reduce project feasibility and slow housing delivery even where planning settings allow residential development.

Development contributions and utility connection requirements can also affect project feasibility where they are uncertain, late, inconsistent or difficult to reconcile with project sequencing. PPI Group does not argue that essential infrastructure should be unfunded or underfunded. Rather, the problem is uncertainty and poor sequencing. Developers and builders need earlier visibility of infrastructure requirements, costs, responsible agencies and expected approval timeframes.

Priority reform areas for housing-enabling infrastructure include:

- Early assessment of water, sewerage, stormwater and drainage capacity for land identified for increased housing supply;
- Clearer timeframes and service standards for utility and infrastructure approvals;
- Better coordination between planning approvals, building approvals, utility approvals and final occupation requirements;
- Standardised documentation for plumbing-related infrastructure and product compliance evidence;
- Transparent and predictable connection charges and infrastructure contribution requirements;
- Mechanisms to resolve conflicting or inconsistent requirements between agencies; and
- Improved recognition that plumbing products and systems are part of the infrastructure chain, not merely downstream construction inputs.

11. Compliance failures create hidden housing supply costs

A housing supply reform agenda must consider the full cost of non-compliance. Poor compliance does not reduce cost. It transfers cost.

A non-compliant plumbing product or installation may appear cheaper or faster at the point of construction, but it can create later costs through rectification work, delayed occupation, disputes between builders and subcontractors, water damage, warranty claims, insurance issues, health and safety risks and loss of consumer confidence.

These costs are often not captured when reform is assessed only by front-end approval speed. PPI Group encourages the Commission to consider downstream compliance outcomes as part of the productivity analysis. A system that approves faster but produces more defects is not a productive system. It is simply moving the cost and risk to the next party in the chain.

For this reason, PPI Group recommends that the Productivity Commission evaluate reforms against both speed and quality indicators, including:

- Time to approval;
- Time to occupation;
- Number and nature of requests for further information;
- Frequency of unresolved post-approval conditions;
- Defect and rectification rates;
- Incidence of non-compliant product use;
- Inspection failure rates;
- Disputes relating to plumbing product compliance or installation; and
- Costs arising from delayed occupation or rework.

12. Features of a best-practice regulatory system for plumbing-related housing delivery

PPI Group recommends that the Commission include the following features in any assessment of a best-practice regulatory system for housing supply.

Feature	Application to plumbing products and housing delivery
Clarity	Participants should know what evidence is required, when it is required, and who is responsible for assessing it.
Consistency	Compliance requirements should be interpreted consistently across jurisdictions, certifiers, utilities and regulators wherever possible.
Proportionality	Approval effort should be risk-based. Low-risk repeatable compliant work should move quickly; higher-risk work should receive appropriate scrutiny.
Accountability	Responsibility should be clear across manufacturers, importers, suppliers, designers, builders, plumbers, certifiers and regulators.
Digital usability	Digital tools should reduce duplication and improve visibility of approvals, evidence, conditions and outstanding issues.
Infrastructure readiness	Essential infrastructure capacity and approval requirements should be identified early and sequenced with land release and construction programs.
Enforcement integrity	Non-compliance should be detected and addressed. The system should not reward parties who avoid compliance obligations.
Outcome measurement	Reform success should be measured by homes completed, homes occupied, compliance outcomes and defect reduction, not just approval speed.

13. Recommendations

1. Recognise plumbing products as essential housing-enabling inputs. Government housing supply reforms should explicitly recognise that compliant plumbing products and systems are fundamental to safe, functional and occupiable housing.
2. Streamline the process of demonstrating compliance, not the underlying standards. Reforms should remove duplication, inconsistent documentation and unnecessary delay while preserving public health, safety, water quality, consumer protection and building performance objectives.
3. Develop nationally consistent product compliance evidence expectations. Governments should work toward standardised recognition of plumbing product compliance evidence across jurisdictions and approval channels.
4. Create or support shared digital compliance evidence mechanisms. A standardised digital approach would reduce repeated evidence requests and improve confidence for builders, designers, plumbers, certifiers and regulators.
5. Bring water, sewerage, stormwater and drainage requirements forward in the approval pathway. Essential infrastructure constraints should be identified early and resolved before they become late-stage project blockers.
6. Use risk-based fast-track approval pathways. Accelerated approval should be available for clearly compliant, low-risk and repeatable housing work, but not as a substitute for competent assessment of essential systems.
7. Preserve inspection and certification integrity. Faster housing delivery should not reduce meaningful inspection of plumbing and related systems, especially where failures may not be immediately visible at handover.
8. Strengthen enforcement against non-compliant products and installations. Non-compliance undermines compliant suppliers, creates unfair competition and increases downstream housing defects.
9. Measure reform outcomes across the full lifecycle. Productivity analysis should consider defects, rework, occupation delays and rectification costs, not only front-end approval time.

Engage PPI Group and the plumbing product sector in future consultation. The sector can provide practical insight into product compliance, supply chain readiness, certification evidence, substitution risk and implementation barriers.

References:

Productivity Commission (2026), Housing supply regulation: Call for submissions, May 2026, Australian Government, Canberra.

Productivity Commission (2026), Housing supply regulation inquiry: Terms of reference, Australian Government, Canberra.

Disclaimer:

This submission is provided by PPI Group for the purposes of the Productivity Commission Housing Supply Regulation inquiry. It is intended to support public policy consultation and should not be relied upon as legal, technical, engineering or regulatory advice for any specific project, product, installation or approval decision.

PPI Group would welcome the opportunity to engage further with the Productivity Commission as the inquiry progresses.

Yours Sincerely,

Nick Tripp
Chief Executive Officer | Executive Director