

05 June 2025

Australian Government
Productivity Commission

Re: National Competition Policy 2025 Review – Standards harmonisation and regulatory efficiency

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 respond to the Productivity Commission's review of National Competition Policy 2025, particularly regarding the role of international standards and regulatory harmonisation. Like Standards Australia, we support all efforts to improve regulatory efficiency and reduce unnecessary compliance burdens. However, we emphasise that reforms must strengthen — not undermine — the trusted, evidence-based, and consensus-driven framework that governs standard development in Australia.

1. Key Principles for Standards Reform

1.1 Australia's right to adapt Standards to local conditions

The plastic pipe industry already adopts many ISO and other international standards. However, these are rarely adopted "as-is." Modifications are typically 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. Therefore, ISO and other 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.

1.2 Importance of sovereign oversight

While international standards often reflect global best practice, they are developed in diverse regulatory and policy contexts. The Australian Government, through the Memorandum of Understanding with Standards Australia, has recognised the importance of sovereign control over standard-setting to ensure national safety, sustainability, and economic competitiveness.

Any reform must preserve this oversight and avoid ceding decision-making to international bodies that do not directly represent Australian stakeholders.

1.3 Consistency and fairness in regulatory adoption

If international standards are to be incorporated into regulation, they must be subject to the same:

- Rigorous consultation and transparency standards
- Stakeholder and expert validation
- Periodic review mechanisms

It would be inappropriate and inequitable to allow overseas-developed documents into regulation without comparable scrutiny as applied to Australian standards.

2. Industry-Specific Considerations for the Plastic Pipes Sector

2.1 Existing International Alignment

The plastic pipe industry in Australia already has high alignment with ISO and EN (European Norm) standards. For example:

- ISO 16422 Pipes and joints made of oriented unplasticized poly (vinyl chloride)
- ISO 4427 Plastics piping systems for water supply and for drainage and sewerage under pressure – Polyethylene (PE)
- EN 12201 Plastics piping systems for water supply, and for drainage and sewerage under pressure – Polyethylene (PE) and others are routinely considered in the development of AS/NZS standards.

However, these are only adopted after careful review and consensus by local committees comprising engineers, utilities, regulators, and manufacturers.

2.2 Fragmentation across jurisdictions

PIPA supports greater national harmonisation of standards across state and territory regulations. Variations in how standards are adopted or referenced by regulators across Australia create significant inefficiencies and compliance burdens for manufacturers and project owners.

The lack of harmonisation across jurisdictions is a greater impediment to productivity than the origin of the standards being applied.

3. Recommendations

PIPA encourages the Productivity Commission to consider the following recommendations:

1. Prioritise national harmonisation of regulatory standards across jurisdictions to reduce duplication and inconsistency.
2. Maintain rigorous expert oversight over all standards adopted into regulation, regardless of origin.
3. Ensure international standards are subject to the same transparency, consultation, and validation processes as domestic standards.
4. Support ongoing industry contribution to standards development, recognising that participation from industry experts ensures standards are fit-for-purpose and responsive to emerging risks and innovation.

We acknowledge the Commission's goals to improve national consistency and reduce regulatory burden. However, the pathway to achieving this must not weaken the trusted, independent standards system that industry and government rely on to protect quality, safety, and public interest.

The plastic pipe industry demonstrates that international alignment is possible — and already happening — when guided by expert input, local conditions, and sovereign oversight. We urge reforms that build upon, rather than bypass, this proven system.

Kind Regards

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