



Submission on the National Competition Policy 2025 public comment request

Insulation Australia (IA) is a product agnostic industry association established to represent building insulation product manufacturers and installers across Australia and New Zealand. Since its establishment in 2011, IA has record of representing the building insulation industry in many areas including on Standards Australia Technical Committees and National Building Code (NCC) reference groups. IA welcomes this opportunity to have input into the NCP 2025. We limit our comments to the question regarding harmonising with international standards and harmonisation of standards.

Impact of lack of harmonisation

In principle, IA is in favour of improved harmonisation with international standards in relation to building insulation, but only with due consideration for the impact on the objectives of the current Australian Standards and the intended regulatory references, such as the National Construction Code. Such impacts can affect product performance in relation to thermal performance (affecting the resultant energy efficiency of the building) and safety (affecting the fire safety performance of the building). Overseas test methods in relation to these areas are not always compatible with current Australian standards referenced in the NCC, the greatest difference being in the area of fire performance testing and the acceptance criteria.

The impact of differences in test standards affects both overseas and Australian manufacturers. Overseas manufacturers are required to retest products to Australian adopted test methods, which imposes additional cost for testing and for obtaining accreditation. This cost applies per product intended for sale in Australia. For Australian manufacturers, the same cost applies for each product intended for sale overseas, which is a barrier to their opportunity to export.

Harmonisation process

With respect to harmonisation, there is currently a process for harmonisation and adoption of international standards through Standards Australia. This is a robust process that should be maintained to ensure that standards are adopted appropriately and provide for the objectives of the NCC without unnecessarily having a negative impact of the cost of production and compliance of products. If improvements were to be made, we feel that Government could look at how the process for harmonisation could be expedited without losing the controls currently in place.

Yours truly,

Keith Anderson

Secretary