

6 June 2025

Chair, Danielle Wood  
Australian Government Productivity Commission



**Re: Consultation on the Productivity Commission's (PC) review of the National Competition Policy (NCP) 2025**

The Engineered Wood Products Association of Australasia (EWPAa) welcomes the opportunity to provide this submission into the Productivity Commission's (PC) review of the National Competition Policy (NCP) 2025, as requested by the Hon Jim Chalmers MP, Treasurer, on 27 March 2025. Our submission focuses on the proposed reform to adopt international standards in regulatory frameworks and harmonise regulated standards across Australia.

EWPAa is both an active participant in and supports the current development system of a wide range of Australian/New Zealand Standards, Codes, guides, and supporting documents that underpin our supply chains, our markets, and the built environment. We also support efforts to improve the efficiency and build on the credible standard development system that is underpinned by scientific review and technical contribution from subject and industry experts over many years.

We urge the PC to consider the following points in their review:

- Any standard development process needs to suit Australian conditions such as climate, technical differences, and local/regional practices. An example is Australian Standard AS 3959, 'Building in Bushfire Prone Areas', which specifically acknowledges the risks of building in Australia's unique environment.
- Recognition that the types of standards are very broad including design, product, consumer, and test methods etc.
- When a new standard or revision of an existing standard is being proposed in Australia, Standards Australia existing process requires that initial consideration of the adoption of existing credible international standards, either in full or in part, is undertaken.
- Any definition of international standards should be broader than just the International Organization for Standardization (ISO) and include other credible standards such as European Standards (EN) or the American Society for Testing and Materials (ASTM).
- Our industry already adopts international standards where they are relevant and fit-for-purpose. Recent manufacturing and product standard examples, include the I-beams test method and high-pressure laminates.
- Decisions on adoption and any necessary amendments should be considered and reviewed by local and subject matter experts on a scientific and technical basis (e.g., through existing relevant Standards Australia technical committees). Part of any review should be consideration of the scope and equivalence between Australian and international standards.
- Public and consumer access to and cost of all standards, including international standards, is an essential consideration.
- Sustainability and commercial viability of Standards Australia should be considered in any decision making around the standard development framework.



- Complexity of demonstrating compliance via international standards should also be considered.

If you have any queries on this submission, please contact Gavin Matthew (EWPAA CEO).

*The Engineered Wood Products Association of Australasia (EWPAA) is a technical association for manufacturers of engineered wood products (EWP), particularly solid timber, plywood, laminated veneer lumber, glue laminated timber, cross laminated timber, particleboard, and medium density fibreboard located throughout Australasia, including Australia, New Zealand, Fiji, and Papua New Guinea. See [www.ewp.asn.au](http://www.ewp.asn.au). On behalf of our industry sector and member companies, EWPAA coordinates a broad market development program, including product certification and testing, PEFC Chain of Custody certification, standards development, research and development facilitation, and technical support.*