



National Competition Analysis 2025

Productivity Commission
Locked Bag 2
Collins Street East
Melbourne VIC 8003

National Competition Policy analysis 2025 – GAMAA Submission

Thank you for the opportunity to comment on the Productivity Commissions discussion paper for National Competition Policy analysis 2025.

Our comments specifically relate to the international standards aspect of the discussion paper. Whilst occupational licensing impacts the operations of GAMAA members, it is best left for other organizations such as Master Plumbers to respond to the different requirements between the State and Territories.

About GAMAA

The Gas Appliance Manufacturer's Association Australia (GAMAA) was formed in 1957 and is the peak industry body representing the interests of Australian manufacturers and suppliers of domestic and commercial gas heating, hot water and cooking appliances and components.

Our 37 member companies employ a combined total of 4,000 workers in Australia. The vast majority of the 18 million domestic gas products enjoyed by Australian consumers are supplied by GAMAA members, with significant local design and manufacturing content.

Our primary activity is to work with our members, government agencies, political representatives and other industry stakeholders to develop and implement workable, equitable and practical initiatives, standards and regulations that result in better economic, social and environmental outcomes and address the unique role of gas domestic and commercial gas products in Australian homes, businesses and buildings in the economy wide transition to net zero.

More information and contact information on GAMAA is available at <https://gamaa.asn.au/>

GAMAA is an active participant in standards development

GAMAA actively participates in the Standards Australia, standards development process with participation in the following committees:

AG-001 Gas appliances
AG-006 Gas installation
AG-010 Natural Gas Quality Specifications
AG-011 Industrial and Commercial Gas-fired appliances
AG-013 Components used for Gas Appliances and Equipment
CS-028 Solar Heating and Cooling
WS-026 Valves primarily for use in Warm and Hot Water Systems
EL-020 Electric Water Heating Appliances
ME-015 Storage and Handling – Liquefied Petroleum Gases
CH-038 Liquefied Petroleum Gas - Composition
BD-095 Retail Food Premises
GAMAA members also participate in many working groups for many Standards Australia committees not listed above, and are active participants in ISO and IEC international committees to develop global standards that can be adopted for Australian needs with or without modification.

International Standards

International standards should not be adopted into Australia without prior review by a cohort of local technical experts, as international practices contained within international standards are seldom transferrable without issue. In most cases, the appropriate forum for such review is the relevant Standards Australia Technical Committee. In this context we also note that Most standards for our industry are mandated through regulation, which makes local review even more important.

Standards Australia Technical committees do not seek to impose barriers to trade, indeed this is prohibited by Standards Australia, rather they seek to adopt technical solutions that reflect the Australian context, including:

- Climate considerations
- Building practices
- Gas type, quality and pressure
- Electrical voltage and frequency
- Water pressure
- Product usage requirements

As identified by GAMAA's active participation in the development of global standards and Australian standards, our industry is actively reviewing international standards for suitability in an Australian context. This requires a thorough and unbiased assessment of risks, costs and evidence-based advice.

The Productivity Commission should review how the Australian Government supports the activities of Standards Australia particularly in its international participation of ISO and IEC standards. At present, industry meets most of the cost burden, by way of direct travel costs to attend meetings and in-kind support of highly respected technical experts to prepare for and attend the meetings.

Streamlining Regulations

There always remain opportunities for the states and territories to provide consistent referencing and application of standards within legislation and regulation. More effort could be applied by ministers and departments to achieve a consistent approach in regulations and the application of technical standards.

Where industry has discussed with states and territories the potential to transition to ISO or IEC standards, there have been unrealistic expectations for the transition, including expectations of removal of Australian standards and forcing the market to move to the ISO or IEC standards. A more sensible solution would be for a dual pathway to exist for an extended period of time enabling the lowest cost of compliance to be applied to the industry, so as new products are developed they can meet compliance with the ISO or IEC standard, without forcing manufacturers to move legacy products from the Australian standard to the ISO or IEC at considerable cost for little, if any, community benefit.

We look forward to further dialogue on this matter. Should you wish to discuss this letter further please contact

Ross Jamieson,
President
6th June 2025