



Because public health matters.

The Master Plumbers and Gasfitters Association of Western Australia

Response to Remote Aboriginal Communities Plumbing Scheme Consultation Paper

September 2019

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Introduction

The Master Plumbers and Gasfitters Association of Western Australia thanks the Department of Mines, Industry Regulation and Safety for this opportunity to comment on the Remote Aboriginal Communities Plumbing Scheme.

Our position today is the same as it was in April 2015 in our response to the Consultation Paper on Basic Plumbing Repairs in Remote Aboriginal Communities.

While we share the Department's view on the hygiene-based health issues that the scheme is intended to help, we disagree with the design of the scheme, the way it is being implemented and any proposal to expand its scope.

We also want to remind the Department about our far-reaching *Better Life Outcomes* proposal that provides alternative approaches to improving the standard of plumbing and basic hygiene in communities.

Summary of our position – 2015 to today

In our April 2015 response we said:

"... we strongly believe remote Aboriginal communities have a right to excellent plumbing infrastructure and plumbing services. Plumbing is the basis of good health and important for all people in Western Australia regardless of location or socio-economic status."

We also explained why we were opposed to all the proposed options for allowing people who aren't qualified plumbers and gasfitters to perform basic plumbing work in communities. In summary, our reasons were:

- The need for a high standard of plumbing work in remote communities
- The risk of deepening the 'second-class citizen' mindset
- Practical realities related to the transient nature of community populations
- Potential confusion about training requirements
- The creation of a precedent for the weakening of plumbing regulations
- Compliance costs
- Lack of cost-benefit analysis
- Knowing how to fix 'basic' problems is not enough

As an alternative solution, we proposed an apprentice training scheme for young people from the communities. The scheme we proposed would build skills, create employment opportunities and make communities more viable.

In September 2016, following the release of the Decision Paper on Basic Emergency Plumbing Work in Remote Aboriginal Communities, we wrote to the Hon Michael Mischin (the then Minister for Commerce) and proposed that a preventative maintenance program be introduced alongside the new plumbing scheme.

Today, our position is unchanged. We still believe the best solution is a combination of training and preventative maintenance. Our *Better Life Outcomes* proposal, which we developed in 2018 in collaboration with stakeholders from industry and the communities, is based on those principles.

What we support in the consultation paper

The connection between plumbing and public health

We fully support the principle that clean drinking water and effective sanitation are essential for public health. This is something we have said often, including in our 2015 response and our *Better Life Outcomes* proposal.

Proposed amendment to qualifying plumbing units

We support the proposal to change the list of qualifying plumbing units. This is an administrative change with no material impact.

Proposed register of 'authorised workers'

We support the proposal to require service providers to keep a register of each 'authorised worker' they employ or engage to perform work under the scheme. We are surprised and concerned that this requirement does not already exist. The fact that there is no such register means there is no way to properly audit who is doing the work.

Our concerns with the consultation paper

The priority given to the review of the scheme

The plumbing industry would like to know why the review of the Remote Aboriginal Communities Plumbing Scheme has been given priority over the finalisation of the broader review of all plumbing regulation..

In July 2018, we submitted a detailed response to the *Consultation Regulatory Impact Statement on Reform of Plumbing Regulation in Western Australia* (the CRIS). Many other organisations and individuals in the industry also submitted responses.

We do not understand why the matters raised in the CRIS, which are far-reaching and of great significance to the future of the industry and the public health of all Western Australians, have still not been addressed.

Endorsement of lower plumbing standards in communities

As an overriding principle, we cannot support any proposal that makes it acceptable to provide Aboriginal communities with a lower level of plumbing services than other Australians, except in genuine emergencies.

Proposed additions to scope of work

We are opposed to any expansion of any aspect of the scheme. Therefore, we strongly object to the proposal to add the following to the scope of work allowed:

- Replacing cistern stop taps
- Replacing flexible connectors
- Replacing flush pipe connectors

These activities involve removing and replacing fittings in the water supply. As such, they are plumbing work that must only be done by qualified plumbers:

Proposed inclusion of 'town communities'

We are opposed to the inclusion of 'town communities' in the scheme as they are within reach of town-based plumbing contractors.

We want to see evidence to support the statement in the consultation paper that some town-based communities “have difficulty in obtaining the services of licensed plumbing contractors in a timely manner despite their proximity to the town.”

We have heard claims that plumbers refuse to visit town-based communities due to concerns about their personal safety. In our view, such claims are false. We believe they are being made to create support for an expansion of the scheme.

Apparent lack of auditing controls in the scheme

The plumbing industry has concerns about the reported volume of work in some communities.

We would like an investigation into who is doing the work and how inspection of the work is being recorded and signed off as required under Part 4A, Section 39 of the *Plumbers Licensing and Plumbing Standards Regulations 2000*.

In addition, the current system cuts across existing contracts that makes a “Head” contractor responsible for ensuring that plumbing work in communities is performed in a defined timeframe by licensed plumbers.

Based on reports we have received from industry, there is a serious discrepancy between the low volume of work orders being sent to contractors for plumbing work and the high volume of work apparently being performed in communities by Environmental Health Workers. This adds weight to our request for an investigation into the operation of the scheme and the way records are being kept.

Questions about the accuracy of data in the consultation paper

After reviewing the statistics on the number of fittings replaced and types of work being performed, we want to express our concerns about their accuracy.

We believe much of the work being performed is not really ‘emergency work’ and want to see a detailed analysis of the real stories behind the data in the consultation paper. For example, we want to know how many of the replaced washers were really causing:

- “(i) a risk to public health and safety; or
- (ii) a significant waster of water”

as required under Part 4A, Section 35 of the *Plumbers Licensing and Plumbing Standards Regulations 2000*.

We want to see evidence that explains why so many fittings were worn or damaged to the extent that they needed replacing, and why there are so many blockages.

If occupants and blockages are damaging fittings through misuse, this supports our case for community education as outlined in our *Better Life Outcomes* proposal.

What we are calling for

- A program of regular scheduled maintenance. This would be cost-effective in the long run and save significant taxpayer dollars.
- A program of education about hygiene and the importance of plumbing and sewage.
- A national apprentice training scheme tailored to attract young people from communities into the plumbing trade.

As stated above, we called for these in our 2015 response, our 2016 letter to the then Minister for Commerce, and our *Better Life Outcomes* proposal in 2018.