



27 September 2019

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To whom it may concern

## **RESPONSE TO CONSULTATION PAPER ON REMOTE ABORIGINAL COMMUNITIES PLUMBING SCHEME**

In response to the consultation paper on the Remote Aboriginal Communities Plumbing Scheme Package published in September 2019, the Western Australian Plumbers Licensing Board (PLB) wishes to express the following views:

### **Question 1: Scope of work permitted**

**Would you support a realignment of the scope of work permitted under the remote Aboriginal communities plumbing scheme as proposed? If not, what concerns do you have with the revised definition and what changes to the proposed scope would you like to see instead?**

The PLB does not support extending the scope of work as proposed. It recommends that the scope of permitted work of the Environmental Health Officers (EHOs) should not cover connections to water supply or potable water as it is essential that these tasks be undertaken by licensed plumbers.

The rationale for introducing Part 4A — Basic plumbing work in remote Aboriginal communities in the Plumbers Licensing and Plumbing Standards Regulations 2000 was to prevent negative health outcomes and to reduce water wastage. The proposed expansion of the scope of works encompasses general plumbing duties and extends beyond the original intent of the amendments. There is no data provided in the report to indicate that the current scheme is not operating effectively to achieve these outcomes.

While there is a plumbing inspector located in Broome and there is a requirement for service providers to oversee the works of EHOs, there is no information provided on how this process operates and whether the works are sighted and approved by a licensed plumber.

The report also states that there is feedback from service providers that work undertaken by the EHOs has resulted in work being performed more expediently however no evidence is provided for this claim. Anecdotal information provided to the PLB is that the licensed plumbers who are contracted to do plumbing work in Aboriginal communities have the capacity to perform all works requested by the Housing Authority even in remote locations. These plumbers stated that they are unaware of any circumstances where a work request has been lodged with the lead contractor where a plumber has been unable to complete the work within 48 hours. It is, therefore, unclear as to the imperative to expand the scope of works.

**Question 5: Definition of 'Eligible remote community'**

**What is your view on the inclusion of town-based reserves on a case-by-case basis? What criteria should town-based reserves be required to meet in order to qualify as an 'eligible remote community'?**

The PLB does not endorse extending the definition of 'eligible remote community' to include town-based reserves. It is highly problematic to have two schemes operating within the same regional area. The proposal would result in people living in a town-based reserve performing minor plumbing works while those residing outside the boundary of the reserve would be breaching the Regulations.

The PLB does not support the existence of two regulatory regimes within the same regional area.

**Question 7: Service providers**

**Do you agree with the proposal to require service providers to keep a register of each 'authorised worker' they employ or engage to perform work under the scheme?**

The PLB is strongly supportive of the proposal for service providers to keep a register of 'authorised workers' who are employed or engaged to perform work under this scheme. This is a requirement for licensed plumbing contractors and would ensure that there is a consistent approach for remote Aboriginal communities and the general community.

Yours sincerely



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**EXECUTIVE OFFICER  
PLUMBERS LICENSING BOARD**