

Industry Guide

The scope of roofing (stormwater) work under the
Plumbing Regulations 2008

What is roofing (stormwater) work?

This document provides guidance on the scope of roofing (stormwater) work that is defined under the Plumbing Regulations 2008 (VIC) which can only be undertaken by licensed or registered plumbing practitioners in Victoria and is regulated by the Victorian Building Authority (VBA).

Regulation 30 of the Plumbing Regulations 2008 sets out the definition of roofing (stormwater) work. Subregulation (1) under this definition reads:

Roofing (stormwater) work is the construction, installation, replacement, repair, alteration, maintenance, testing or commissioning of any roof covering or roof flashing or any part of a roof drainage system involved in the collection or disposal of stormwater, which connects to ground level ...

Terms used by this definition, including “roof covering”, “roof flashing” and “roof drainage system”, are not specifically defined in the Regulations and may be subject to different interpretations. The VBA refers to technical documents to interpret these terms or a plain English interpretation if a technical document does not provide guidance.

“Roof flashing”

The primary technical documents for roofing (stormwater) work are *SA HB 39 Installation code for metal roof and wall cladding* (HB39) and *AS/NZS 3500.3 Plumbing and drainage Part 3: Stormwater drainage* (AS/NZS 3500.3). All roofing (stormwater) work must comply with the requirements in these documents as they are incorporated into the Regulations.

HB39 provides some assistance in interpreting the definition and scope of roofing (stormwater) work. For example, “roof flashing” is defined in HB39 as: “*A rigid or flexible material, usually metal, fixed over, against or built into an abutment to form a weathertight joint.*” This definition of roof flashing aligns with the intended use of this term within the Regulations.

“Roof covering” and “roof drainage system”

Neither AS/NZS 3500.3 nor HB39 defines the terms “roof covering” and “roof drainage system”. In the absence of a technical definition for the terms, both terms should be interpreted broadly and in line with their plain English meaning:

- The term “roof drainage system” is interpreted to mean any aspect of the roof that is involved in the conveyance of stormwater from the roof catchment area to below-ground stormwater drains or on-site retention or storage tanks. This would include items such as valley gutters, eaves gutters, rainheads and downpipes.
- The term “roof covering” is interpreted to mean any aspect of the roof that serves to cover and protect or conceal something else.
- This term “roof covering” is interpreted broadly, however, subregulation (2)(b) excludes certain coverings from this term. In particular, it clarifies that “any roof covering consisting of non-metallic tiles, slate or flat membrane sheeting” is not included within the definition of roof plumbing work. This means that work involving some common forms of roof covering, for example installing terracotta and concrete tiles, is not regulated plumbing work and does not need to be undertaken by registered or licensed plumbers.
- Example 1 (see page 4) shows a typical roof covering captured under the scope of work for roofing. Example 2 shows a typical roof covering that is excluded from the Regulations.

In cases where it remains unclear whether a particular instance of roofing work, or the use of certain materials in the roofing system, falls within the definition of roofing (stormwater) work, then the objectives and intent behind the Plumbing Regulations 2008 should be considered:

- The objective is to prevent stormwater from penetrating into the building structure and causing moisture ingress.
- The intent behind the regulation of roofing (stormwater) work is to ensure that all work is performed in a manner that properly conveys stormwater from the roof catchment area to appropriate stormwater drainage systems or on-site retention tanks.
- The underlying intent is made clear through aspects of the definition relating to roof drainage systems and also in the use of the word 'stormwater' in the title of the class itself.
- If one of the purposes of the roofing work, or use of specific materials in the roofing system, is to ensure watertightness, this may indicate that the work in question does fall within the definition of roofing (stormwater) work.

Example 1: A roof covering captured under the Plumbing Regulations 2008



Image supplied by BlueScope

Example 2: A roof covering excluded under the Plumbing Regulations 2008

