

Regulatory requirements for the off-site construction of plumbing systems

Introduction

This fact sheet provides guidance on the regulatory requirements applicable to the construction of plumbing systems in off-site locations, i.e. a location different to where the plumbing system is to be installed and commissioned. This document aims to address industry uncertainty regarding the application of the regulatory scheme to the growing practice of plumbing systems being constructed in locations such as factories and workshops before they are transported to site for installation. Examples of plumbing systems commonly constructed in this manner include skid-mounted heated water systems (generally comprising of a bank of several off-the-shelf WaterMark-certified continuous flow units and associated flue, pipework and fittings), HVAC risers and modular bathroom systems (commonly referred to as bathroom pods).

Methods of compliance for this work

The VBA advises that work involving the off-site construction of plumbing systems may be treated as either: (1) regulated plumbing work (if carried out in Victoria); or (2) as work involved in the construction of a plumbing product. The person carrying out the work must determine at the outset how this work is treated and must comply with the relevant regulatory requirements for the chosen method of compliance. The requirements applicable to each method are set out below.

Method 1: Construction of a system as plumbing work

If the construction of a plumbing system is treated as regulated plumbing work, all relevant requirements under the *Building Act 1993* ('the Act') must be complied with. These include:

- All plumbing work must be carried out by a registered or licensed plumbing practitioner;
- All products and materials used in the work must be fit for purpose;
- The work is carried out in accordance with prescribed technical requirements and standards; and,
- A compliance certificate must be issued.

Method 2: Construction of a system as a plumbing product

If the system is constructed as a plumbing product, then evidence of suitability must be obtained. The primary method of ensuring products meet this requirement is through authorisation under the WaterMark Certification Scheme (WMCS). Where a product is listed on the WaterMark Schedule of Specifications, evidence of its suitability must be demonstrated through the provision of a WaterMark certificate of conformity. Where a product does not form part of the WMCS, then evidence of suitability may take a number of forms including a report from a registered testing authority or a certificate from a professional engineer.

For products used in plumbing work that falls outside of the scope of the Plumbing Code of Australia (PCA), other certification/authorisation schemes or regulatory requirements relating to suitability apply. For example, each gas appliance used in a gasfitting installation is subject to the Energy Safe Victoria appliance acceptance

Want to know more?

If you have a technical enquiry, please email plumbingtechnicaladvice@vba.vic.gov.au or call 1300 815 127.

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scheme under the *Gas Safety Act 1997*.

VBA enforcement of the regulatory requirements

The construction of an off-site plumbing system only needs to meet the requirements under one of the methods of compliance detailed above. Each set of requirements is distinct and there are no circumstances under which a person would need to comply with both sets of requirements in the construction of a single plumbing system.

The VBA will enforce compliance against the requirements relevant to the appropriate method. If the plumbing system is constructed as plumbing work, the work will be subject to the VBA's plumbing audit process and the proactive inspections program. If the system is constructed as a plumbing product, the VBA will check the system for a WaterMark certificate of conformance (or for other evidence of suitability if not on the WaterMark Schedule) in any compliance activity that occurs after it has been installed on-site.

Regulatory requirements for the on-site installation of a plumbing system

The method of compliance for the construction of the system off-site does not affect the regulatory requirements applicable to the work involved in installing and commissioning the system on-site. Irrespective of whether the system was constructed as a product or plumbing work, the plumbing practitioner installing and commissioning the system on-site must comply with all relevant regulatory requirements under the Act.

Who issues the compliance certificate for a system constructed as plumbing work?

Under the requirements of the Act, licensed plumbers must issue a compliance certificate for any plumbing work with a total value of \$750 or

more (including the costs of labour and materials). If a licensed plumbing practitioner is taking responsibility for the construction of the plumbing system as plumbing work as well as its installation and commissioning on-site, they may issue a single compliance certificate covering the entirety of this work.

However, in situations where Plumber A is responsible for the construction of a plumbing system as plumbing work and Plumber B is responsible for the system's installation and commissioning on-site, both plumbers must issue a compliance certificate for their respective work. In these circumstances, Plumber B may rely on the certificate issued by Plumber A as evidence of suitability for the system that is being installed on-site.

The VBA wishes to remind plumbing practitioners of the importance of including sufficient details on the compliance certificates to ensure that the work undertaken by each licensed plumber is clearly identifiable.

What if the plumbing system is constructed outside of Victoria?

Plumbing systems constructed interstate or overseas must always be treated as a plumbing product when used in plumbing work undertaken in Victoria. The requirements of the Act only have effect within Victoria and therefore any plumbing work undertaken outside of this state is not plumbing work to which the Act applies.

Accordingly, any plumbing system that is constructed outside of Victoria must have appropriate evidence of suitability according to the relevant requirements (e.g. a WaterMark certificate of conformity where a product is listed on the Schedule) in order to be installed as part of plumbing work in Victoria.

HIGH LEVEL SUMMARY OF REQUIREMENTS APPLICABLE TO EACH METHOD OF COMPLIANCE

	System constructed as a product	System constructed as plumbing work
Off-site construction of the plumbing system		
Suitably qualified plumber(s) required?	No – Registration/licence not required to carry out this work	Yes – All persons carrying out plumbing work must be an appropriately registered or licensed plumbing practitioner
Compliance certificate required for construction?	No – Not required	Yes – If the plumber constructing the system will not be taking responsibility for its installation
		No – If the plumber constructing the system will later be issuing a certificate for the system’s installation and commissioning
Evidence of suitability required for the system?	Yes – Appropriate evidence of suitability must be obtained for the completed system, i.e. WaterMark certificate of conformity for a product on the Schedule or other evidence of suitability as per Part A2.2 of the PCA	No – Evidence of suitability is not required to be obtained for the system
Use of certified plumbing materials and products?	This will depend on the requirements of the relevant certification scheme including specifics of the authorisation relevant to the system in question	Yes – Plumber must ensure use of authorised/certified products and materials in the construction of the system.
On-site installation and commissioning of the plumbing system		
Suitably qualified plumber(s) required?	Yes – All persons carrying out this work must be an appropriately registered or licensed plumbing practitioner	Yes – All persons carrying out this work must be an appropriately registered or licensed plumbing practitioner
Compliance certificate required for the installation?	Yes	Yes