Local Government Association Tasmania

Our Ref: JS | DJL | LR

20 April 2026

Kristy Bourne
Secretary
Consumer, Building and Occupational Services
Department of Justice
Sent via email: haveyoursay@justice.tas.gov.au

Dear Ms Bourne,

LGAT submission: Plumbing Approval Process Reform

Thank you for the opportunity to provide a submission in response to the Plumbing Approval Process Reform discussion paper. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members, all 29 councils.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as a lack of support by the LGAT for that specific issue.

We support the State Government's intent to reduce unnecessary delays and improve efficiency in housing delivery, while maintaining consumer protections.

Local government agrees that reform of the plumbing approval process for new standalone Class 1a buildings is needed. The existing framework has, in some cases, resulted in duplicated assessments and time delays that are not always proportionate to the level of risk involved.

We agree that the proposed fast-track plumbing process provides a better balance of risk/benefits than alternative models that would remove pre-notification or reduce the risk category of residential plumbing work. However, this approach does still carry risks. It is important that a defined notification process and council oversight be retained, as these are critical to managing risk where plumbing work is concealed, and defects may only emerge years after initial occupation.

Role of local government

Councils play a positive role in supporting plumbing quality and compliance, particularly for less-experienced practitioners and in more technically complex installations. Council inspection and approval processes provide structured points of interaction where designs, preparatory work and key stages of installation can be reviewed, allowing non-compliant or sub-standard work to be identified early, and guidance provided before defects become

concealed within the building fabric. This regulatory oversight supports more consistent standards across the industry and reduces the risk of costly post-construction rectification.

Councils direct significant resources towards meeting required timeframes for regulatory processes while ensuring assessments and inspections are undertaken thoroughly and consistently. We note that the proposed reforms are likely to shift workload within councils rather than remove it. The reduced front-end assessment workload will be offset by increased demands on verification, inspection, compliance and enforcement. The proposed two business-day compressed verification timeframe under the fast-track pathway places pressure on councils, particularly those with limited staffing capacity, and increases the likelihood of needing to undertake further work on compliance and dispute management.

Careful implementation of reform must ensure these impacts are recognised, that appropriate cost recovery mechanisms are available to councils, and that they are monitored. CBOS should work with councils to centralise the collection and collation of data on plumbing non-compliance. This should then be updated and reported regularly to measure the impact of the reform.

Industry readiness and capacity

We understand there are concerns about the plumbing industry's readiness and capacity to take on increased responsibility for certification, documentation and administrative compliance under a streamlined model. These concerns have been shared inside and outside the industry.

Reducing front-end assessment and interaction with councils risks shifting regulatory and administrative burdens to plumbing practitioners who may not have the systems, experience or capacity to manage them effectively. While the proposed fast-track plumbing process represents the lowest-risk reform option identified in the discussion paper, participation should remain optional. Participants opting into this pathway will have lower levels of early regulatory oversight, which lowers risks and delivers better outcomes for both practitioners and consumers.

The additional administrative burden placed on small plumbing businesses through self-certification may reduce industry efficiency, counter to the intent of the proposed reform.

Inspections are critical

Inspection powers remain an essential component of the system, providing councils with the ability to identify non-compliant work early, prevent costly post-construction rectification, support industry capability, and deter poor practice. The proposed fast-track pathway must operate alongside, not in place of, effective inspection and enforcement tools.

Risks require mitigation

Transferring greater responsibility to plumber certifiers brings clear risks that will require careful mitigation. Levels of plumbing non-compliance are already very high, creating additional costs and delays in housing construction. Reform that results in non-compliance being identified later in the construction process will increase these costs and delays. Given the varied understanding of building, planning and hazard management requirements, targeted and significant education and training will be essential.

We support excluding higher-risk plumbing work, including on-site wastewater management systems and non-gravity systems, from the fast-track pathway. Any future consideration of faster pathways for these systems must account for the technical complexity and potential environmental and public health risks.

Improving information and efficiency

We support strengthening the proposed Notice of Work requirements as part of the implementation of the fast-track process so that councils have access to sufficient information at the verification stage. Documentation requirements that assist with confirming stormwater arrangements, understanding site constraints and supporting inspections should be retained or enhanced. To reduce potential duplication, requirements to provide information that does not materially assist councils in assessing or managing plumbing risk should be reconsidered.

Overall, we support the direction of the proposed reforms and encourage further refinement to ensure the fast-track process improves efficiency while preserving safety, quality standards and consumer confidence.

Please contact Jon Stanger if you have any questions or would like further information, at jon.stanger@lgat.tas.gov.au or 0437 374 125.

Yours sincerely,



Dion Lester
CHIEF EXECUTIVE OFFICER