



INFORMATION SHEET

BUILDING

Ref: NAT MAT 12-07

CHAIN OF CUSTODY – DO YOU KNOW WHERE YOUR PRODUCTS ARE FROM?

This information sheet demonstrates how the supply chain can operate in purchasing building products and what verification process should be used, for both imported and domestically manufactured products, to ensure the builder and the consumer are protected.

Builders procure products through a range of avenues including local and overseas manufacturers, trade suppliers, local importers of overseas products, and supply and install contractors. In building a house, a range of avenues are likely to be involved. Also in some cases the supply of a single product could actually be from more than one source.

The variety of sources for materials can make obtaining verification of a product's compliance with the Building Code of Australia (BCA) complex.

The chain of custody for building products can have a significant influence on the level of documentation that can be provided to demonstrate a product's performance and its evidence of suitability.

The following scenarios aim to demonstrate common procurement processes used by builders. They explain what verification documentation should be provided to the builder in each case so that you are protected if there are any flaws or failures of the products you purchase.

1. Manufacture of a product from a domestic manufacturer and sold directly from the manufacturer - window

- a) The designer specifies on the plans the window details, including dimensions and design wind loads or N/C rating glazing requirements and includes a notation that glazing must comply with AS 1288 and windows must comply with AS 2047.
- b) The builder receives the specifications, sources a local window manufacturer and provides plan elevations and window specifications for their manufacture. NB if using a new manufacturer ensure they know their obligations to manufacture windows that comply to the BCA and Australian Standards prior to ordering.
- c) The manufacturer reviews the specifications and identifies glazing required and window framing to comply with the standards.
- d) The manufacturer may voluntarily participate in an industry audit program that demonstrates their continued compliance with the standards.
- e) The manufacturer supplies windows as per the specifications, which are appropriately labelled and, if requested, a compliance certificate could be issued.
- f) The builder installs windows as per window installation instruction to ensure wind and water egress is controlled.
- g) The builder obtains a certificate from the manufacturer verifying compliance to AS 1288 and AS 2047 and provides documentation to the Building Surveyor for approval.

DISCLAIMER - The above is intended to provide general information in summary form. The contents do not constitute specific advice and should not be relied upon as such. Formal specific advice should be sought by members with respect to particular matters before taking action.

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- h) The customer can have confidence that the windows in the home meet the required standard and the builder can have confidence that if there are any failures in the windows, there is an ability to contact the supplier and seek a remedy.

2. Manufacture of a product from an overseas manufacturer and distributed through a local importer - window

- a) The designer specifies on the plans the window details, including dimensions and design wind loads, glazing requirements and includes a notation that glazing must comply with AS 1288 and windows must comply with AS 2047.
- b) The builder receives the specifications and searches for an imported window solution.
- c) The builder identifies an importer and provides the importer with the plan elevations and window specifications for their manufacture.
- d) The importer may or may not be a member of an industry association and may or may not be familiar with the BCA and their obligation of supplying windows that comply with AS 1288 and AS 2047, so that the safety of occupants and structure of building is maintained following installation.
- e) The importer forwards window specifications to the overseas manufacturer plant for manufacturing.
- f) The manufacturer reviews the specifications and glazing requirement but may not have an understanding of the BCA, their obligations to manufacture products that comply with AS 1288 and AS 2047 and has no testing arrangements in place that test to Australian Standards.
- g) The manufacturer fabricates the windows based on their normal practice and arranges shipment to the importer.
- h) The importer oversees delivery to site.
- i) The builder notices no compliance labels are on the windows and no certificate of compliance has been provided. The builder asks the importer to obtain compliance documentation from the manufacturer stressing their contractual obligations to supply a product that is fit for purpose.
- j) The importer is unable to obtain authentic compliance certificate from the manufacturer and advises the builder accordingly.
- k) The building surveyor will not approve building stage without evidence that demonstrates compliance for the windows until rectified.
- l) The builder will need to obtain a test of the window locally in an accredited test facility or return non-compliant windows to the importer and seek a full refund. If this is not possible, the builder may need to launch proceedings through fair trading laws to seek a remedy.
- m) The builder orders new windows and installs them, providing a certificate that verifies compliance to AS 1288 and AS 2047 to the Building Surveyor for approval.

3. Manufacture of a product from an overseas manufacturer and distributed and sold through an importer and local supplier – steel strapping for timber framing

- a) The builder reviews the plans, wind load and refers to the current timber framing and truss standard AS1684.2.
- b) The builder undertakes a stick build frame construction and calculates the bracing required for the timber frame. They choose steel strapping as the bracing method and determine that the material required for the bracing to comply with the standard as G300 for the tensile grade for structural use and Z275 as the galvanization coating corrosion resistance of the steel.
- c) The builder purchases imported strapping from a supplier, which is sold as fit for structural bracing. No evidence that the strapping complies with AS 1684.2 is provided with the material purchased.
- d) The builder installs strapping as per the timber framing standard.
- e) The building surveyor inspects the frame stage and asks for proof of using compliant strapping, to ascertain galvanization coating compliance.

- f) The builder requests proof of compliance from the supplier and is advised that no documentation has been provided by the importer.
- g) The supplier acknowledges their responsibility to sell products as fit for purpose, but is not necessarily aware of Australian Standards and how the strapping needs to demonstrate compliance.
- h) The supplier is unable to obtain compliance documentation from the importer.
- i) The builder arranges with the supplier to resupply compliant product proving it is fit for purpose and is supplied with a certificate verifying that the steel is G300-Z275 and complies with AS 1684.2 2010 and replaces non-compliant strapping with compliant strapping.

NB - To ensure products sold as fit for purpose comply with the BCA the builder can request and obtain proof before purchasing the product. This can help to eliminate the supply of non-compliant products, product returns and any disputes between the builder, consumer and the supplier.

4. Client supplies imported product as part of the contract - window

- a) The designer specifies on the plans the window details, including dimensions and design wind speed, glazing requirements and includes a notation that glazing must comply with AS 1288 and windows must comply with AS 2047.
- b) The client approves the plans and investigates the purchase of windows online from overseas with the intention to save money.
- c) The builder agrees to install the windows supplied by the client and has covered this in the contract and the price.
- d) The windows are delivered to site and when the builder checks them they realise that no compliance labels are present on the windows.
- e) The builder advises the client that the onus is on them to obtain compliance documentation from the manufacturer prior to installation (in accordance with the contract).
- f) Whilst the client does not necessarily understand the relevance of having windows that comply with the BCA they do request evidence of BCA compliance with AS 1288 and AS 2047 from the manufacturer. The manufacturer is unable to provide documentation.
- g) The builder cannot proceed to install the windows without this compliance documentation as the onus is on them to install compliant products no matter who the supplier is.
- h) The client is left with non-compliant windows and could try to get refund from manufacturer and potential make a complaint with the ACCC.
- i) In the meantime work progress is halted and the builder will need to seek legal advice on varying the contract until compliant windows are supplied by the client.

NB - To overcome this issue builder needs to clearly stipulate to the client at contract stage their responsibility to supply product that complies with the BCA.

Summary

These scenarios each show how it is essential for the builder to be aware of the chain of custody of a building product they intend to use.

Builders should always be checking and asking where their products come from and ensuring that there is information that verifies how the products meet the necessary standards.

In many cases, problems don't arise, but in just as many cases, they do. Thinking about who supplies you with your products and using reputable companies that have guarantees, warranties and that you are confident will still be there if something goes wrong, will ultimately save you time and money.