



Consultation Paper

Alternate Standards Development Models

January 2023

Proposed changes to:

- *SG-001 – Preparing Standards*
- *SG-002 – Structure and Operation of Standardisation Committees*
- *SG-003 – Standards and Other Publications*
- *SG-007 – Adoption of International Standards*
- *SG-015 – Australian Involvement in International Standardisation*

Standards Australia invites stakeholders to review these proposals and to provide any feedback by 15 March 2023.

Feedback on the changes to Standards Australia's Standardisation Guides can be made in the Public Comment Portal [here](#).

Stakeholder consultation forums will be held as set out in this paper.

Background

In May 2022 the SDAC¹, the Standards Australia Board Committee responsible for Standards Australia's standards development process, looked at questions related to:

- the Australian standards development model broadly,
- the ever-changing expectations of industries and contributors
- new and emerging areas of endeavour where traditional models of standards development may not be fit for purpose.

The Committee asked the Management team to develop options for accelerated development models for Australian Standards.

At its November 2022 meeting, SDAC asked the management team to consult on the proposed changes to Standards Australia's Standardisation Guides to support these changes.

The case for change

For over 100 years, Standards Australia has grown, changed, and adapted to the world in which it operates. For those same 100 years, Standards Australia has based its standards development model on the principles of openness, transparency, and consensus.

Over the last 10 years, the pace of change in almost every part of our lives has increased to levels never seen. In areas of technical and technological endeavour, established systems are changing and converging and the traditional ways of developing standards content, through vertically aligned technical committees may not always serve industry and community needs.

In some areas of need, the structures that we have relied on, are not established, and not likely to be established in a time and manner that is compatible with the traditional standards development model.

Together, these elements make alternative pathways to the development of Australian Standards necessary.

¹ the Standards Development and Accreditation Committee, or SDAC

Proposal for change and consultation

Maintaining open, transparent and available rules for the development of Australian Standards that provide certainty of process is a fundamental part of the standardisation process. In order to effect the changes proposed, additions and modifications have been made to Standards Australia's Standardisation Guides to introduce:

- An alternative path for the development of Australian Standards (including International Adoptions),
- A streamlined process for the adoption of International Standards (Opt-in process), and
- Updates to the process and definition of Interim Standards to enable greater uptake of this delivery model when consensus is not possible or may be too early to be established.

The proposed changes to Standards Australia's Standardisation Guides will be the governance mechanism to give effect to these changes. This consultation paper provides explanatory and additional information to support the changes.

Embedded within these proposed changes are the concepts of flexibility and user-centricity. As the demand for technical solutions increases, a single and linear standards development model is no longer able to deliver against the needs of the Australian community.

The proposed model seeks to:

- Enable engagement in broad areas of activity in simplified ways,
- Allow development work in new areas of activity,
- Support the development of flexible types of content to help users solve problems, and
- Deliver horizontal programs of work, which traverse multiple industry sectors and Technical Committees, with integrity, efficiency and speed-to-market.

Standards Australia invites stakeholders to review these proposals and to provide any feedback by 15 March 2023.

Potential benefits

Ensuring that Australia has a modern, fit-for-purpose, responsive and inclusive model for standards development is a primary objective of Standards Australia's Board, Standards Development and Accreditation Committee (SDAC), management team and stakeholder community. For over 100 years, Standards Australia has managed to deliver outcomes for communities by applying its capabilities and structures to problems that it can usefully solve.

Through this piece of work, Standards Australia is seeking to:

- Ensure that stakeholder communities have a standards development model that is fit for purpose and as rapid as is usefully achievable,
- Be inclusive of new and emerging areas of work where traditional standards development governance structures may not exist, or may not be fit for purpose,
- Build an ecosystem where standards development work can support pre-competitive innovation in new areas of activity,
- Manage the risk associated with technical development work being siloed,

- Ensure that as technologies and markets develop, Australian companies have access to a world class standards development system aligned to the systems of the international standards setting bodies like the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), and
- Ensure that those stakeholders who have confidence in and use well the traditional models of standards development are able to continue to use them to achieve their objectives.

Essential Elements for the development of an Australian Standard

When approaching this review process, consideration was given to what, at the core, are the essential elements of an Australian Standard. These essential elements are derived from Standards Australia's obligations, as Australia's national standards body, at both a national and international level.

In developing these proposals, the following essential elements were deemed to be essential in any new or revised standards development pathway. Each of the proposed models has been designed to meet or exceed the requirements of the WTO Agreement on Technical Barriers to Trade Annex 3 *Code of Good Practice for the Preparation, Development and Adoption of Standards* and the provisions contained within the Memorandum of Understanding between Standards Australia and the Australian Government (SA Commonwealth MoU).

What	Why
Treating products from the territory of a WTO Member no less favourably than products originating in Australia	WTO TBT Agreement Annex 3
Creating no unnecessary barriers to international trade	WTO TBT Agreement Annex 3
Not duplicating a published (or nearly published International Standard)	WTO TBT Agreement Annex 3
Making every effort to achieve a national consensus	WTO TBT Agreement Annex 3
Where possible, being performance based	WTO TBT Agreement Annex 3
No less than 60 days for public commenting period before the adoption and publication of a standard	WTO TBT Agreement Annex 3
Market competition will not be inhibited	SA Commonwealth MoU
Small business and consumer inputs will be included	SA Commonwealth MoU
Contributors (or contributing organisations) to any Australian Standard will be transparent	SA Commonwealth MoU

The engineering and construction sector forms the world's largest industry worth around \$11.5 trillion a year or 13 percent of global GDP. While we see digital transformation accelerating across all sectors, the pace of change has been uneven, and the construction sector has been relatively slow to move. To enable a digital future requires an integrated approach embracing the swift nature of technological changes that are happening in areas such as industry 4.0, digital twins and smart cities. To create a metadata layer and framework (with standards embedded) we see the need for a faster and agile standards development model/process, which has been highlighted in this paper.

Alternative path for the development of an Australian Standard

The proposal includes a model for an alternative path to the development of an Australian Standard. To give effect to this new path, changes are proposed to Standardisation Guide SG-001 where the policies for the development of an Australian Standard have been amended to include an alternative path for the development of an Australian Standard.

These changes include:

- Amending the pathway to initial approval to allow Standards Australia's management team to propose new work, in consultation with stakeholders,
- Establishing a role for a Project Committee to aid in the delivery of the technical work, and
- Adopting the consensus principles of ISO and IEC principles, in place of the established formula used by Standards Australia in our traditional model.

The governance requirements of this model are proposed to include an approval from the Standards Development and Accreditation Committee, differently from the current model where approval for the proposal is obtained from the Production Management Group and approval to publish the standard is delegated by SDAC to the Head of Standards Development. This proposal is driven principally to ensure that a governance layer exists between Standards Australia's management, who, in this model, can propose work and approve it.

Standardisation Guide SG-002 has also been revised to introduce the role of a Project Committee, separately from the established roles of Technical Committees as they exist today. Importantly, it is not proposed to establish Project Committees within the traditional standards development model, with the established model remaining in place.

This pathway would lead to a deviation from the traditional nominating organisation model, where the traditional path would not work. It is not proposed that the alternative pathway would operate where the traditional path model is operating.

Important safeguards have been included within the proposed pathway including a market competition assessment and an inclusion requirement for small business and end-consumer interests to participate where available. The SDAC is responsible for project and publication approval.

In well-established sectors, standards are seen as a recommended benchmark after years of trialled and tested processes.

In new and emerging areas, where consensus can be hard to achieve and processes are still being tested, an interim standard may be more appropriate.

Hydrogen, while not new, is being proposed to be used in a new way. The application of hydrogen in transport, industrial processes and gas networks is an exciting prospect and interim standards can be used to provide guidance on how to use hydrogen both safely and effectively in these scenarios. For a number of these scenarios, interim standards will be the only way to get initial consensus as R&D and pilot projects are still ongoing.

Streamlining Interim Australian Standards

While a model that has been in place for some time, it is expected that the usage path of an Interim Australian Standard could be better utilised in different areas of activity. To help promote this pathway, provisions to SG-003 have been amended to remove the automatic withdrawal of an Interim Standard after a period of two years from publication, requiring the TC to decide whether to withdraw, convert to an AS, revise the text or reconfirm/extend.

Governance Elements

In proposing these new pathways, Standards Australia has been careful to ensure appropriate levels of governance and separation of functions to support actual and perceived separations between management and governance responsibilities. A comparison between the pathways is set out as follows:

Governance element	Traditional Path	Alternative Path
Proposal development	A proponent is required to champion and shepherd work	Standards Australia acts as the effective proponent supported by interested stakeholders
Proposal development	A comprehensive scope of work to be done is required	Standards Australia conducts or qualifies research into the proposed area of work and the identification of stakeholders relevant to the work. A comprehensive articulation of the need for the work is provided.
Justification of benefit to Australian community	A Net Benefit case is developed setting out the need for the work and positive and negative impact across 5 areas of consideration	A Net Benefit Analysis is developed to provide an assessment of how a standard could benefit the Australian community and economy. A market competition assessment will be conducted setting out an assessment of potential barriers to national and international trade

Governance element	Traditional Path	Alternative Path
Approval	PMG approved proposal	SA's Production Management Group (PMG) recommends proposal for the SDAC approval
Expertise	A Constituted Technical Committee is established to represent a broad range of interests	A Constituted Technical Committee is not established. A Project Committee (PC) is formed comprising of a group of experts to review content development. Consideration must be given to the inclusion of small business and end consumer interests.
Content development	A Constituted Technical Committee leads development of the technical content	Standards Australia led development of the technical content (Technical Writers or retained consultants)
Public consultation	Public Comment for a 60-day period. Technical committee must address all comments.	To meet WTO obligations, the draft is submitted for 60 days of consultation and is promoted with targeted experts with an interest in the area. All comments received are considered and resolved with input from the Project Committee.
Approval	Decision to publish follows a formal ballot of a constituted technical committee, and the resolution of any negative ballots. SA's Management, under delegated authority from the SDAC approves the publication of an Australian Standard.	Consensus is deemed to have been achieved if technical comments received through the consultation process are resolved, and a formal assessment is made as to support for the publication. SA's PMG recommends the publication of the Australian Standard for the SDAC approval (Out of session and via email)

Streamlining the adoption of International Standards

To support the joint ambition of the Australian commonwealth government and Standards Australia to adopt International Standards², the wherever possible, and to relieve stakeholders of an element of duplicative administrative burden, a new opt-in model for the adoption of International Standards is proposed.

This model, available to constituted technical committees, would support an automatic adoption process of International Standards by the committee with stakeholder support safeguards in place. This includes a 4 week period of community consultation and the capacity for the technical committee to object to the adoption if needed.

It is not proposed that this model would be implemented in all technical committees, or in areas of contestation.

² International Standards are standards developed by the International Organization for Standardization (ISO) and the International Technical Commission (IEC)

Stakeholder Consultation Forums

Virtual consultation forums will be held as follows:

- Tuesday 21 February 9:30 am – 10:30 am
- Thursday 23 February 1:00 pm – 2:00 pm
- Wednesday 1 March 2:00 pm – 3:00 pm
- Tuesday 7 March 9.30 am –10:30 am
- Monday 13 March 11:00 am – 12:00 pm

To register for a forum, please click [here](#).

Summary of Changes in Standardisation Guides

A summary of the proposed changes for Standards Australia's Standardisation Guides is provided below.

The drafts are available on Standards Australia's [Public Comment Portal](#) to provide comments and feedback until 15 March 2023.

SG-001, *Preparing Standards*

Clause	Summary of Change	Rationale for change
3.2 Accredited organisations	Alignment with the <i>SDAC Charter</i> and <i>SA Constitution</i> .	Editorial and alignment to governance changes in 2021.
4 Standards Development Essential Elements and Principles	<ul style="list-style-type: none"> Removal of <i>4.1 Externally funded</i> and <i>4.2 Accredited SDO managed</i> information. Inclusion of <i>4.1 Standards Development essential elements</i> to identify accord with the WTO Agreement on TBT Annex 3 and SA Cth MoU. Inclusion of <i>4.2.2 Flexibility and user centricity</i> to introduce alternative paths for development in new and emerging areas. 	<p>SA no longer categorise the allocation of responsibility and resourcing under specific pathways. SA today resources any work which meets the quality criteria for the development of an Australian Standard. Work funded by third parties is still possible and continues to take place.</p> <p>It should also be noted that the removal of <i>4.2 Accredited SDO managed</i> from this section of the document, does not mean that the Accredited SDO model is no longer available. It still is, but requirements for Accreditation are available under different policy and documentation. Becoming Accredited Standards Australia</p> <p>In developing the alternative path for the development of an Australian Standard care was taken on ensuring the policies and procedures observe the essential elements for the development of an Australian Standard – and these are now contained in SG-001.</p> <p>The inclusion of the new principle of flexibility and user centricity reflects the organisation's ambitions, as documented in our Strategic Plan, of delivering relevant content that meets user needs.</p>
6.1.2 Request for a new project	Updates to include comparison of the Traditional development Path, the Alternative Path and the Governance Element required to facilitate the path.	To provide clarity on the key steps/roles for both Paths during critical stages and elements of governance in the development of an Australian Standard.
6.1.2.2 Alternative Path	Deviations to the process under the Alternative Path are included in this Clause.	<p>Key call outs and important steps in this clause are the provision of a "market competition assessment". This ensures the new standard does not unintentionally restrict the market and competition, as consultation on the proposal does not require a balance of stakeholder groups .</p> <p>A justification for the use of the alternative path also needs to be provided.</p>
6.1.3 Assessment and approval of new projects	<ul style="list-style-type: none"> Includes the SDAC's responsibility to assess and approve Alternative Path projects after an initial review by PMG. 	Given the alternative path is primarily led by SA Management, for good governance, the assessment and approval of new alternative path projects is assigned as a role of SDAC. For project approval in the

	<ul style="list-style-type: none"> Includes the SDAC's review and endorsement for the establishment of a Project Committee formed with a group of experts (Alternative Path). 	traditional path, this is a delegated role of PMG. This ensures the right checks and balances are in place.
6.3 Document drafting	Includes information that for the Alternative Path, SA will engage a technical expert or consultant to develop the working draft and share with the Project Committee for their feedback and comments.	<p>In order to progress the work in the alternative path at pace, an SA appointed technical expert or consultant will develop the draft and share with the Project Committee for their review and feedback.</p> <p>Key to the success of this approach is in ensuring the appointed individual works closely with experts and understands the industry and goals for the project.</p>
6.4 Draft standards and public comment	Includes information that for the Alternative Path, and to meet WTO TBT obligations, the draft is available for 60 days of consultation and is promoted with targeted experts with an interest in the area. All comments received are considered and resolved with input from the Project Committee.	This is an important step to ensure compliance with requirements of the WTO TBT. In order to accelerate the process of comment resolution, it is intended that the expert/consultant would propose the resolution of comments and seek feedback from the PC.
6.5 Approval of standards	Includes the Alternative Path's accordance with the definition of consensus from ISO/IEC Guide 2:2004.	Since Project Committees are not constituted in the same way as Technical Committees, the existing consensus formula would not work. The consensus definition used by ISO and IEC and defined in Guide 2 maintains the overall principle of consensus, allowing for flexibility in its application.
7.1.1 Opt-in adoption of International Standards as Australian Standards	Includes the Alternative path to the adoption of International Standards as Australian Standards in detail with process flow.	SA has received feedback from many contributors that the process to adopt International Standards is cumbersome and repetitive. Contributors approve the international standard, are asked to to approve the proposal for its adoption and then asked again to approve the ballot. It is a redundant process. This process allows for TCs to opt-in for the automatic adoption of international standards they are contributing to.
Throughout SG	Terms of Reference (ToR) has become Committee Scope.	Editorial.

SG-002, *Structure and Operation of Standardisation Committees*

Clause	Summary of Change	Rationale for change
3 Standards Development Process	Removal of reference to Standards Development Pathways allocation of resources to core functions and through prioritised support.	Consequential update from SG-001. As described above.
5.2 Sub-committees	Removal of reference to courtesy votes.	This practice no longer takes place. Change to reflect current practice.
5.5 Project Committees	Inclusion of new Clause regarding Project Committees (PCs) which are not formally constituted committees but may engage a broad group of stakeholders. These PCs may be formed under the Alternative Path.	Technical Committees require a balance of representation from Nominating Organisations. In certain areas of rapidly evolving technology or innovation, industry associations may not exist and the process of formally constituting a Technical Committee may not be appropriate or expedient enough to allow for the rapid standards development work needed. A Project Committee allows for greater flexibility in its formation, including both experts with or without Nominating Organisations.
6.3 Committee balance	Inclusion of Stakeholder Interest Representatives.	Change to reflect category within SA's systems.
12.1 Project Managers	Removal of External Project Managers (EPMs) and Shadow Project Managers (SHPMs).	As the Pathways under SG-001 Clause 4.1 have been removed, these roles are no longer required.
12.2 Drafting documents	Inclusion of the responsibility for the technical content of a Standard resides with the TC, PC or for Alternative Path projects, a Technical Writer in consultation with a PC.	Consequential update from SG-001. As described above.
12.3 Meeting minutes	Removal of External Project Managers (EPMs) and Shadow Project Managers (SHPMs).	As the Pathways under SG-001 Clause 4.1 have been removed, these roles are no longer required.
12.6 Declaration of interests of committee members	Inclusion of Project Committees.	Ensuring the requirement for all participants to declare their interests are also applicable to Project Committees.
Throughout SG	<ul style="list-style-type: none"> Committee Member Deed has become Committee Member Agreement. Terms of Reference (ToR) has become Committee Scope. 	Editorial and reflection of changes on the nature of the legal instrument – from a Deed to an Agreement.

SG-003, *Standards and Other Publications*

Clause	Summary of Change	Rationale for change
5.2 Interim Standards	Changed automatic withdrawal after two years if the Committee does not take action, to say the Committee reviews it and decides whether to withdraw, convert to an AS, revise the text or reconfirm/extend.	Whilst a useful publication type, Interim Standards have not generally been used or embraced by stakeholders. The changes to the process are intended to make them more attractive and allow SA to further promote it.
Throughout SG	<ul style="list-style-type: none"> Changed wording around “full’ Standard” or “consensus-based standardisation” to Standards developed using “the traditional pathway”. Changed wording around “lower consensus” publications to “other” publications. 	Editorial.

SG-007, *Adoption of International Standards*

Clause	Summary of Change	Rationale for change
A.1 General outline of the process	Update to Item d to clarify a wider promotion for participation in the development of International Standards so they are flexible and include varying global circumstances.	Provides for a greater push for Australia to be involved in international standards particularly in new and emerging areas.
A.2 International Adoption	<p>Includes descriptions of the paths to adopt international standards; the Traditional Path, Alternative path to the development of an Australian Standard (including international adoptions) and Opt-in Adoption of International Standards as Australian Standards.</p> <p>Public Comment (PC) period for adoptions of already published international standards will be 4 weeks (reduced from the current 6 weeks)</p>	<p>Consequential update to SG-001 to allow the alternative pathway to be used for adoptions, and new opt-in process.</p> <p>The changes to the Public Comment period align with international practice of some other National Standards bodies and reflect the lower level of consultation deemed necessary, as these are already published Standards.</p>



SG-015, *Australian Involvement in International Standardisation*

Clause	Summary of Change	Rationale for change
13 Adoption of International Standards	<p>Includes descriptions of the paths for NMCs to adopt international standards; the Traditional Path, Alternative path to the development of an Australian Standard (including international adoptions) and Opt-in Adoption of International Standards as Australian Standards.</p> <p>Public Comment (PC) period for adoptions of already published international standards will be 4 weeks (reduced from the current 6 weeks)</p>	Consequential change to SG-001.
Throughout SG	<ul style="list-style-type: none"> • Committee Member Deed has become Committee Member Agreement. • Terms of Reference (ToR) has become Committee Scope. 	Editorial and reflection of changes on the nature of the legal instrument – from a Deed to an Agreement.