

13 September 2022

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Mr Paul Martyn
Director General
Department of Energy and Public Works
VIA EMAIL

Dear Paul

NCC 2022 Surface Drainage to Floor Wastes

I am writing to request that the Department of Energy and Public Works exclude the new surface drainage requirements to all floor wastes included in the Housing Provisions of the National Construction Code (NCC) 2022 either through a Queensland NCC variation or through the Queensland Development Code.

Background

The new requirements are contained in section 10.2.12 of Volume 2 of the NCC 2022 and in a new definition in Schedule 1 of 'floor waste'.

The consequences are significant.

Additional surface drainage requirements will be introduced for (non-required) floor wastes, typically situated in the centre of the bathroom floor. These floor wastes are installed to ensure correct operation of subfloor fixture drainage connections and not to drain surface water.

Current published guidance¹ states that there is no requirement for falls to these floor wastes.

The 'proposal for change' to consider the introduction of grading to floor wastes was the subject of a Preliminary Impact Analysis (PIA) which concluded that the change was inadvisable. Further information in this regard is set out at **Attachment 1**.

The Australian Building Codes Board (ABCB) nonetheless proceeded with the changes, despite there not being clear evidence to demonstrate a benefit.

¹ Queensland Government Building Newsflash 'Falls to a Floor Waste' issued 6 September 2004; ABCB News 'To grade, or not to grade' 22 November 2017

There has been no communication from either the ABCB or the Department of Energy and Public Works that their current documented advice (that grading to floor wastes is not required) will be amended.

Master Builders' Position

Master Builders is concerned that timely and clear communication to industry has not occurred. It is also very concerning that such a change can be made despite the findings of the PIA and against the advice of the technical experts.

Concrete slabs and platform floors will have to change to meet the new requirement, increasing costs in the order of \$2,000 for each wet area requiring grades to floor wastes.

Further, there is a concern of non-compliance for self-assessable wet area renovations that would not necessarily require building approval.

Bathroom renovation works are also required to comply with the new grade waste requirements. The requirements may be considered too costly or difficult to undertake (such as jack-hammering parts of the slab to achieve falls or increasing joist sizes for an upper floor bathroom). We are concerned that homeowners may seek unlicensed persons to perform non-compliant renovations or pressure a QBCC licensed contractor to overlook the new requirements.

We are recommending that the Department of Energy and Public Works revisit the introduction of such an onerous, ineffective, and costly technical requirement.

We note there is a South Australian exclusion already in place where the floor waste is provided solely for the connection of plumbing fixtures. This can serve as a guide for a Queensland variation.

We look forward to working with the Department in finding a workable solution for both homeowners and industry.

Regards,

Paul Bidwell

CEO

Attachment 1

A project was included in the ABCB 2019-20 work program for consideration of all issues associated with a requirement for falls to all wet area floor wastes, including cost/benefits through a Preliminary Impact Analysis (PIA).

The project research and the PIA (dated June 2020) recommended that the NCC not be amended. It was found that PIA Option 2: Amend Deemed-to-Satisfy Provisions to require grading to non-required floor wastes was ineffective and inadvisable, including the following:

- A reduction in slip hazard is not achieved on account of moisture remaining on a floor provided with grading.
- Microbial growth in concealed spaces is already addressed to the extent considered necessary by existing NCC requirements for waterproofing.
- The protection of property from damage is beyond the scope of the NCC. Nevertheless:
 - A burst flexible hose typically releases water in a manner that cannot be controlled by a floor waste provided with grading. For example, should flooding occur in an ensuite with a non-required floor waste, the carpet in the adjoining room would need replacing regardless of whether grading was provided or not.
 - Damage is achieved by water before it arrives at a floor waste. For example, the cabinet containing a burst flexible hose will receive damage regardless of the provision of a floor waste or graded floor.
- The costs of grading present a disincentive to installing floor wastes, possibly leading to the perverse outcome where a floor waste, that would otherwise have been installed voluntarily, would not be installed.
- The NCC already requires floor wastes to the extent required necessary for the achievement of its goals. To require grading to non-required floor wastes therefore goes beyond the goals of the NCC.