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SUBJECT: MAIN ROADS WA SPECIFICATION 201 QUALITY MANAGEMENT TO AS/NZS ISO 9001

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to Main Roads Western Australia (MRWA) on the proposed MRWA Specification 201 Quality Management To AS/NZS ISO 9001.

CCAA is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries. Our members operate cement distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout Western Australia. For your information, a list of CCAA members in Western Australia is provided in Appendix 1.

CCAA supports actions by MRWA that enables a system that provides confidence to the customer in the ongoing supply of quality heavy construction materials.

CCAA provides the following detailed comments:

201.03 Definitions	Ref	Table 201.1 Standard Terminology
	Note	The definitions for "Superintendent", "Contractor" and "Principle" are not included. If not listed in this table, there should at least be a reference to where their definitions can be found
201.05.02 (a) Scope of Quality Management Plan	Ref	The QMP must as a minimum include the scope of works detailed in Specification 100 GENERAL REQUIREMENTS for the Contract and address any other requirements detailed in the Contract
	Note	CCAA recommends that the QMP refers to the Scope of Works rather than repeat them. The Scope of Works is going to be a separate and very detailed document anyway, which forms part of the contract between the "Principle" and "Contractor".
201.06.01 Point 6 (Holding Point)	Ref	At least 10 working days before conducting any materials conformance testing, the Contractor must make available to the Superintendent the Laboratory Quality Manual required by NATA so that an initial audit of the laboratory can be conducted

	Note	CCAA recommends a more practical approach would be for the NATA accredited laboratory to provide to the Superintendent, via the Contractor, proof of all current NATA accredited sampling and testing procedures. The internal audit might be conducted by a less experienced person than that appointed by NATA anyway and in most cases this person will not review each of the tests but rather just look at the documentation anyway.
201.12.03 Internal Audits	Ref	Internal Audits 1. Internal Contract-based quality audits must be carried out by the Contractor within six weeks of commencement of work under the Contract and at a maximum of three-monthly intervals thereafter . A schedule of the audits must be documented and maintained, and the latest copy provided to the Superintendent on request.
	Note	The three-monthly audit is considered a very high frequency for Audit. NATA, third party ISO 9001 Audit and one internal audit per year is generally considered to be sufficient to have confidence in the materials supplier. If in the initial audit there are too many non-conformances, a follow-up audit to close out these non-conformances should be conducted. The project cost would unnecessarily increase with the requirement of an initial audit plus a three-monthly audit. CCAA supports third party audits at an appropriate frequency agreed to between Suppliers and Contractors that is appropriate to the scale and risks of the project.
Annexure 201A-2.0	Ref	Table 201A-4 MINIMUM TESTING FREQUENCY; Specification -820; Construction Element- Water; Minimum Frequency- per month
	Note	CCAA recommends that the testing frequency should be reduced to 1 test per 6 months.
	Ref	Table 201A-4 MINIMUM TESTING FREQUENCY, Specification 603, Concrete Barriers, Concrete Strength and Consistency. Special Class Concrete, 1 per 20 m ³ or part thereof, (1 test if less than 20 m ³), N Class as per AS 1379
	Note	Definition of S Class is also nominated in AS1379. Nature of the design for Slipform concrete barriers often results in N32 or N40 Grade concrete being used in Slipform as a S Class concrete often due the type of mix and low slump requirements. However this often is incorrectly interpreted to require the test frequency of 1 in 20m ³ in some projects. For the purpose of clarity, CCAA recommends Concrete barrier testing be 1 in 50m ³ as this is consistent with AS1379 for all concrete Grades.

Western Australia's regulatory environment needs to be internationally competitive to continue to attract capital to invest into the state to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Western Australia's productivity, housing affordability and lower infrastructure costs.

The provision of affordable heavy construction materials helps to facilitate the delivery of affordable infrastructure, contributing to the completion of Western Australia's infrastructure projects within budget.

There is no more important time than now for the construction sector, supported by an efficient heavy construction materials supply chain, to provide the engine to build Western Australia's post COVID economy and create jobs.

Please do not hesitate to contact me to discuss any of these issues in more detail.

Yours sincerely



ROGER BUCKLEY






State Director Western Australia

APPENDIX 1

CEMENT CONCRETE & AGGREGATES AUSTRALIA

MEMBERSHIP

FOUNDATION MEMBERS

 ADBRI Adbri Limited	 Boral Australia	 Cement Australia Pty Ltd
 Hanson Australia Pty Ltd		 Holcim (Australia) Pty Ltd

WESTERN AUSTRALIA

ORDINARY MEMBERS

Flyash Australia Pty Ltd Fulton Hogan Industries Lime Industries Pty Ltd	Pilatti Bros Transport Ransberg Pty Ltd T/a WA Premix and WA Bluemetal Urban Resources Pty Ltd	
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ASSOCIATE MEMBERS

Concrete Colour Systems Concrete Waterproofing Manufacturing Pty Ltd T/a Xypex Australia	GCP Applied Technologies Sika Australia Pty Ltd Westrac	
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