

WaterMark Certification Scheme

Advisory Notice

Lead free requirements for certain plumbing products

Intent

This Notice is to provide advice to WaterMark Certification Scheme (WaterMark) stakeholders about the forthcoming limitation to the allowable content of lead in certain plumbing products.

This change will be given effect through an amendment to the 2022 edition of the National Construction Code (NCC) Volume Three – Plumbing Code of Australia, for adoption on 1 September 2025.

Advice

The Australian Building Codes Board (ABCBC) decided to limit the allowable lead content in plumbing products, which contain copper alloys and are intended for use in contact with drinking water, to a weighted average lead content of not more than 0.25%. Drinking water is defined in the NCC as “water intended primarily for human consumption but which has other domestic uses”.

The lead free requirements were set out in clause A5G4(2) of the NCC 2022, Volume Three Public Comment Draft, published by the ABCBC Office on 10 May for public comment until 11 July 2021.

Attachment A contains the NCC 2022 Volume Three amendment agreed by the ABCBC in November 2021, including revisions resulting from comment received.

In recognition of the impact of this change for industry, the ABCBC agreed to a 3 year transition period, to commence upon the adoption of the amended NCC Volume Three on 1 September 2022, to enable the recertification of such products.

From 1 September 2025, clause A5G4(2) of the NCC Volume Three will take effect. Only products WaterMark certified as conforming to the lead free provisions, where required, will be authorised for use in plumbing installations.

Products that do not conform to the lead free provisions will no longer have valid certification and will not be authorised for use in contact with drinking water.

In preparation for this change, the WaterMark Administration will issue Notices of Direction to WaterMark stakeholders which will set out the certification transition arrangements including terminology, documentation, product evaluation, testing and marking requirements. A revised WaterMark Schedule of Products, indicating the products included in the scope of the lead free provisions, will be issued with the initial notice. A certification transition timeline will also be provided.

The ABCB Office will publish a detailed implementation plan to provide industry with as much notice as possible and to assist manufacturers, suppliers, certifiers and accredited testing laboratories with the transition.

The WaterMark Administration looks forward to working with stakeholders to implement this initiative developed to improve public health and safety in Australia.

Further Information

Should any WaterMark stakeholder require further clarification, they should contact the ABCB Office directly on 1300 134 631 or email watermark@abcb.gov.au.

Date of publication: 24 November 2021

ATTACHMENT A

A5G4 Evidence of suitability - Volume Three (PCA) 2022

- (2) Any product that **contains copper alloy and** is intended for use in contact with drinking water must have a weighted average lead content of not more than 0.25% verified in the form of either—
- (a) a test report provided by an Accredited Testing Laboratory, in accordance with NSF/ANSI 372; or
 - (b) a WaterMark Licence issued in accordance with (3), if it includes compliance with NSF/ANSI 372.

Notes:

1. A5G4(2) does not take effect until 1 September 2025.
2. Note 1 does not prevent use of products certified in accordance with A5G4(2) prior to 1 September 2025.

Application:

Products subject to the requirements of A5G4(2) are specifically nominated in the [WaterMark Schedule of Products](#).

Exemption:

1. **Products** that are used exclusively for non-drinking uses such as manufacturing, industrial processing, irrigation, or other uses where water is not anticipated to be used for human consumption are excluded from the requirements of A5G4(2).
2. Products excluded from the requirements of A5G4(2) are specifically nominated in the [WaterMark Schedule of Products](#).

Explanatory information:

1. Some examples of **products** subject to A5G4(2) include:
 - (a) Copper alloy fittings.
 - (b) Stainless-steel braided hoses.
 - (c) Valves (such as valves used for isolation, backflow prevention, alteration of pressure and temperature).
 - (d) Taps and mixers.
 - (e) Water meters.
 - (f) Pumps (for use with cold and heated water services).
 - (g) Water heaters.
 - (h) Residential water filtration equipment.
 - (i) Water dispensers (such as boiling and cooling units, drinking fountains and bottle fillers).
 - (j) Fire sprinkler systems connected to the cold water service that are not isolated from fixtures and fittings intended to supply water for human consumption
2. Some examples of **products** excluded from the requirements of A5G4(2) include:
 - (a) Shower heads for bathing.
 - (b) Emergency showers, eye wash and/or face wash equipment.
 - (c) Pumps used for irrigation, fire-fighting or other non-drinking purposes.
 - (d) Fire-fighting water services and equipment including residential fire sprinklers.
 - (e) Appliances, including dishwashers and washing machines.
 - (f) Commercial boilers associated with heating, ventilation and air-conditioning systems.
 - (g) Sanitary fixtures (such as toilets, cistern inlet valves, bidets and urinals).
 - (h) Non-drinking water services (such as recycled water systems).

3. Lead is currently permitted in small proportions in the raw materials used to manufacture some plumbing products. Whilst the allowable lead levels permitted in [products](#) ensures compliance with the Australian Drinking Water Guidelines, the use of [lead free](#) products is encouraged to avoid the potential for adverse effects on human health.