



# Consultation paper: Regulation amendments for medical gas work

Gas and Electricity (Consumer Safety) Amendment  
(Medical Gas Work) Regulation 2020

Home Building Amendment (Medical Gas Work)  
Regulation 2020



Customer  
Service

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## Minister's message

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I am proud to present this consultation paper on the regulations for the licensing scheme for persons and entities involved in medical gas work.

In June 2020, the NSW Government committed to introducing a robust regulatory new scheme: a licensing framework for medical gas systems in medical facilities, developed in consultation with industry and other key stakeholders. This was achieved through the *Gas Legislation Amendment (Medical Gas Systems) Act 2020*, which is due to start on 1 November 2020.

The development of supporting regulations to implement the licensing framework is the important next step in delivering on this commitment.



The proposed amendments to the Gas and Electricity (Consumer Safety) Regulation 2018 and the Home Building Regulation 2014 proposed in this paper will put laws in place to allow the scheme to begin. These amendments include all the necessary features for a robust scheme, including licensing obligations, reporting obligations, compliance and enforcement powers, and provisions to address defective work and serious medical gas accidents.

The medical gas work industry plays an integral role in providing services to facilities where reticulated medical gases are used such as public and private hospitals, day surgeries, dental clinics, and aged care facilities. The amended Bill passed by Parliament which established the new scheme now also includes veterinary practices across NSW as facilities where reticulated medical gases are used. The Government wishes to consult specifically on this area as it was outside scope of the initial consultation period when drafting the Bill.

The proposed changes will set new standards of safety and work – addressing the need for the installation of medical gases to meet the expectations of industry and those who are seeking medical assistance. The NSW Government remains committed to ensuring that the terrible tragedies that occurred at the Bankstown-Lidcombe Hospital are never repeated.

This consultation paper sets out the objectives and intent of the proposed amendment regulations and seeks feedback from key stakeholders and the community. I encourage you to take part in this consultation and have your say on these important regulatory changes.

Kevin Anderson MP

**Minister for Better Regulation and Innovation**

# Consultation process

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## Make a submission

Interested organisations and individuals are invited to read this consultation paper and comment on the just the areas of interest, or all the issues raised. Submissions are invited on any of the matters raised in this discussion paper or anything contained in the proposed amendment regulations.

Matters covered by the *Gas Legislation Amendment (Medical Gas Systems) Act 2020*, the *Gas and Electricity (Consumer Safety) Act 2017* and the *Home Building Act 1989* are not the subject of this consultation process. Matters in both the Gas and Electricity (Consumer Safety) Regulation 2018 and the Home Building Regulation 2014 are covered in this consultation because their provisions are extended to apply to medical gases.

To assist you in making a submission, an optional online submission form will be available on our website at [www.fairtrading.nsw.gov.au](http://www.fairtrading.nsw.gov.au) or <https://www.nsw.gov.au/improving-nsw/have-your-say/>. However, this form is not compulsory and submissions can be in any written format.

Submissions can be made by email and the Department requests that any documents provided to us are produced in an 'accessible' format. Accessibility is about making documents more easily available to those members of the public who have some form of impairment (visual, physical, cognitive). Further information on how you can make your submission accessible is available at <http://webaim.org/techniques/word/>. Printed copies can be requested from NSW Fair Trading by phone on 13 32 20.

### Identified stakeholders

This consultation paper has been provided directly to some stakeholder organisations. A list of these stakeholders is provided at **Appendix 3**.

## How to lodge your submission

You can provide a submission in one of following ways:

- using the online form for this consultation at <https://www.fairtrading.nsw.gov.au/consultation-tool>
- by email to: [medicalgas@customerservice.nsw.gov.au](mailto:medicalgas@customerservice.nsw.gov.au)
- by mail to:

Regulation amendments for medical gas work consultation

Better Regulation Division

NSW Department of Customer Service

4 Parramatta Square

Paramatta NSW 2150

**Submissions close at 5:00 pm on 27 September 2020.**

### **Important note: release of submissions**

All submissions will be made publicly available. If you do not want your personal details or any part of your submission published, please indicate this clearly in your submission together with reasons. Automatically generated confidentiality statements in emails are not enough. You should also be aware that, even if you state you do not wish certain information to be published, there may be circumstances in which the Government is required by law to release that information (for example, in accordance with the requirements of the *Government Information (Public Access) Act 2009*).

## **Next steps**

After the consultation period has closed:

- all submissions will be considered and assessed
- if necessary, the proposed amendment regulations will be changed to address issues identified in the consultation process
- if further information is required, targeted consultation will be held before the amendment regulations are finalised.

# Chapter 1: Introduction and key changes

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## Introduction

In June this year, the NSW Government committed to introducing a robust regulatory licensing scheme for medical gas systems in medical facilities, developed in consultation with industry and other key stakeholders.

The *Gas Legislation Amendment (Medical Gas Systems) Act 2020* (**the Amendment Act**) amends the *Gas and Electricity (Consumer Safety) Act 2017* (**the G&E Act**) and the *Home Building Act 1989* (**the Home Building Act**) to facilitate the introduction of a licensing framework for medical gas systems in medical, health and veterinary facilities in NSW.

The Amendment Act created three categories of specialist work in the Home Building Act:

- medical gasfitting work,
- medical gas technician work, and
- mechanical services and medical gas work.

The Amendment Act and accompanying regulations will begin on 1 November 2020, with transitional provisions in place to allow for industry to be appropriately qualified and licensed.

The amendments outlined in the draft regulations and the consultation paper are to support the Amendment Act. The

- Gas and Electricity (Consumer Safety) Amendment (Medical Gas Work) Regulation 2020 (**the G&E Amendment Regulation**), and
- Home Building Amendment (Medical Gas Work) Regulation 2020 (**the Home Building Amendment Regulation**)

include the changes to the supporting regulations:

- Gas and Electricity (Consumer Safety) Regulation 2018 (**the G&E Regulation**), and
- Home Building Regulation 2014 (**the Home Building Regulation**).

This consultation paper sets out the objectives and rationale of the proposed amendment regulations and seeks feedback from stakeholders and the community. This paper should be read in conjunction with the proposed amendment regulations.

## Key provisions

The primary objective of the proposed regulations is to provide the legislative support and administrative detail for the operation of the medical gas licensing framework introduced by the Amendment Act.

The key changes in the proposed amendment regulations include:

- prescribing substances used for medical purposes as medical gases
- referencing relevant Australian and International Standards to ensure that medical gas work is compliant with these standards
- conduct of safety and compliance tests on medical gas work and reporting requirements
- obligations to report defective work
- reporting of a serious medical gas accident
- machinery provisions to allow for the regulation of medical gas installations
- prescribing specialist categories of work for the purposes of licensing under the Home Building Act, and
- details around information sharing.

## Existing licence holders

The new section 15A of the Home Building Act allows those who are already licensed to continue to undertake construction and maintenance of a mechanical heating, cooling or ventilation system associated with a building, including incidental design work. A licence will not be required for mechanical services for those who are licensed under any of the following categories:

- the Home Building Act for refrigeration work, air-conditioning work and roof plumbing.
- the *Plumbing and Drainage Act 2011* for plumbing and drainage work.
- the *Design and Building Practitioners Act 2020* for specialist work.

## Chapter 2: Proposed changes to the Gas and Electricity (Consumer Safety) Regulation 2018

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The following discussion points provide greater detail on provisions in the proposed amendments to the G&E Regulation including definitions, compliance and testing and prescribing the relevant Australian Standards. In addition to new clauses, a number of the existing powers in the G&E Regulation are also extended to apply to medical gases. A summary of the proposed changes in the amendment regulations is in **Appendix 2**.

### Definitions

The amending Regulations propose changes to current definitions under the G&E Regulation to give effect to the intent of the Amendment Act:

- **'authority number'** has been extended to incorporate a person in relation to medical gasfitting work, medical gas technician work and mechanical services and medical gas work
- **'person responsible'** has been changed to more accurately reflect the duties of the person
- **'safety and compliance test'** is replaced with a new definition to include medical gas installations. The details of safety and compliance tests are set out in new Part 13A, which is discussed later in this chapter.

The amending Regulations also add categories to definitions in the Amendment Act:

- **Medical facility** excludes premises used for residential purposes and pathology laboratories. These places are proposed to be excluded as they do not fall within the scope of the intent of the Amendment Act, as there is no risk to patients.
- **Medical gas** is the following substances:
  - oxygen
  - nitrous oxide
  - helium
  - nitrogen
  - carbon dioxide
  - medical air
  - surgical tool gas
  - common mixtures of the gases referred to in above, and
  - waste anaesthetic gas

Under the G&E Act, a medical gas is a substance used for medical purposes. Medical purposes are not defined in the legislation and as such have their ordinary meaning. Therefore, if a medical gas listed in the G&E Regulation is used for another purpose, then it will not be captured by the law. For example, using oxygen at a service station is not a medical purpose, or using oxygen at a dive shop is not a medical purpose. The Fair Trading website will contain further information to assist persons to understand what their obligations are under the law.

Some of the definitions proposed in the Bill as introduced by the Government were amended by Parliament. One of these is the definition of **medical facility**, which now includes veterinary hospitals within the meaning of the *Veterinary Practice Act 2003*. Under this Act a **veterinary hospital** means premises the subject of a veterinary hospital licence. As this category expands the coverage of the scheme beyond the safety of patients receiving medical treatment, the Government is seeking your views on whether this category is retained, and if so, are any changes required to implement this new category.

1. Do you have any comments on the definitions in the regulation?
2. Should veterinary hospitals also be captured under the law?

## Compliance with the relevant standards

Industry standards, both Australian and International, play an important role in the regulatory scheme to ensure that medical gas work is done to a high standard and safely.

The new section 38A of the G&E Act provides that work is to comply with regulations and sets the intention of Government to prescribe particular requirements in the regulation. The new section 38B of the G&E Act provides responsibilities of persons concerning the safety of medical gas installations to ensure that the medical gas installation is maintained in accordance with the relevant Australian Standards and International Standards that are prescribed by the regulations.

The proposed Clause 69A of the G&E Regulation lists the following Australian Standards (as in force from time to time) in relation to each new category of specialist work that are required to be complied with:

- AS2030 - Gas Cylinders General requirements
- AS 2473.1 Valves for compressed gas cylinders Part 1: Specifications, type testing, and manufacturing tests and inspections
- AS 2473.2 Valves for compressed gas cylinders Part 2: Outlet (threaded) and stem (inlet) threads
- AS 2473.3 Valves for compressed gas cylinders Part 3: Outlet connections for medical gases (including pin-indexed yoke connections)
- AS 2568 Medical gases—Purity of compressed medical breathing air

- AS 2896 Medical gas systems—Installation and testing of non-flammable medical gas pipeline systems, and
- AS 2902 Medical gas systems—Low pressure flexible hose assemblies.

As with Australian Standards, the relevant International Standard that must be complied with for the purposes of section 38A of the Amendment Act is ISO 7396:2007 Medical gas pipeline systems — Part 1: Pipeline systems for compressed medical gases and vacuum.

3. Are there any other standards that are relevant and should be listed to be complied with? If yes, please provide the standards and the reason why.

## Safety and compliance tests

The new Part 13A of the G&E Regulation sets out the requirements for medical gas work for compliance, testing and reporting requirements, including offences for non-compliance.

### Who can carry out the safety and compliance tests

Under the new Clause 69B only a qualified person can carry out a safety and compliance test to determine compliance with AS2896 Medical gas systems – Installation and testing of non-flammable medical gas pipeline systems. A qualified person, for the purposes of this Part, is a person authorised under the Home Building Act to do medical gas technician work, medical gasfitting work and mechanical services and medical gas work without supervision. A qualified person must conduct a safety and compliance test on medical gasfitting work, medical gas technician work, or mechanical services and medical gas work, or as part of a medical gas installation after the completion of the work.

### Requirements for notifying safety and compliance tests

The new Clause 69C sets out the notification requirements for reporting of results for safety and compliance tests. It outlines when a notice is required, who the notice must be given to, what should be in the notice. This mirrors existing requirements for other installations regulated by Fair Trading under the G&E Regulation, such as electrical installations. The provisions detail the information required and the form the notice must be in, including that it must:

- be in the form approved by the Secretary of the Department of Customer Service
- describe the work done and identify the medical gas installation concerned
- specify the name and authority number of each person who carried out, or supervised the carrying out of, the work concerned, and
- if applicable, specify the name and authority number of any person engaged by the owner or occupier of the medical gas installation (whether or not for fee or reward) to provide, or arrange for the provision of, the work concerned
- specify the name and authority number of the tester and the date on which the test was carried out, and

- be signed by the tester and the work provider (if any).

In addition, under the new Clause 69D(2) a 'work provider' must not cause, or permit an employee, agent or contractor of the provider, to carry out a test on the work unless they are qualified.

4. Is there any more information that should be included in the safety and compliance test notice in new Clause 69C(3)?
5. Are there enough reporting requirements to the Secretary on the testing, and are they suitable?

## Rectification of defective work

A requirement has been included to facilitate the reporting of defective work to improve the safety of patients and staff in medical and health facilities.

The new Clause 72A in the G&E Regulation allows an authorised officer to direct the rectification of non-compliant medical gasfitting work. This also applies to electrical installation work and gasfitting work. Failure to abide by the direction is an offence. The proposed requirement will improve the safety of medical gas installations by providing that defective medical gas installation work is rectified in a timely manner.

6. Are the requirements in relation to reporting defective medical gas installation work appropriate? If not, what further directions could be placed on a 'responsible person'?
7. Do you think that the compliance provisions are adequate and fit for purpose? If not, explain why.

# Chapter 3: Proposed changes to the Home Building Regulation 2014

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## Specialist work

### Clause 14

The Home Building Act and the Home Building Regulation provide a regulatory framework for contractors, supervisors and tradespersons who undertake general building and specialist work in NSW.

Section 21(1)(b) of the Act allows for specialist categories of licences and certificates to be issued to suitably qualified tradespeople. Specialist work is defined in the Home Building Regulation and includes work done in relation to commercial and business premises as well as residential premises.

It is proposed that Clause 14 of the Home Building Regulation is amended to include three new categories of specialist work for medical gas as follows:

- medical gasfitting work
- medical gas technician work
- mechanical services and medical gas work.

The third licensing category was included later and did not appear in the consultation Bill. There is some overlap with existing licensing categories in NSW, including:

- the Home Building Act for refrigeration work, air-conditioning work and roof plumbing.
- the *Plumbing and Drainage Act 2011* for plumbing and drainage work.
- design work the *Design and Building Practitioners Act 2020* for specialist work.

The new section 15A of the Home Building Act does allow those who are already licensed to continue to undertake construction and maintenance of a mechanical heating, cooling or ventilation system associated with a building, including incidental design work.

### Exemptions will not apply to medical gas work

Clause 26 of the Home Building Regulation provides an exemption from the requirements of Section 12 (Unlicensed work) for persons holding licenses or certificates to do specialist work, if the work is done in relation to their own premises or premises they reside in, or in premises owned or occupied by the holder's employer.

An amendment to Clause 26(1) removes this exemption for mechanical services and medical gas work, medical gasfitting, and medical gas technicians, as these persons should be required to be licensed

under the Act if they do work on premises they own or premises owned or occupied by their employer, such as a private hospital or clinic.

### **Work descriptions on licenses**

Clause 20 of the Home Building Regulation requires extended descriptions of the work for holders of contractor licences, supervisor certificates or tradesperson certificates. It is proposed that work for the specialist work for the three categories for medical gas are added into Schedule 4 of the Regulation. The work description for mechanical services and medical gas work is taken directly from the Amendment Act.

## **Information sharing**

Minor changes to clause 71A make it possible to share information between the NSW Department of Customer Service, the NSW Ministry of Health and SafeWork NSW. Information that is obtained in administration or execution of the Act can be disclosed, if the purpose of disclosing the information is to assist persons or bodies to exercise functions under the Act.

8. Are there any factors that should be considered with licensing mechanical services in NSW?
9. Are there any other government departments that should be included in the information sharing arrangements?

## Chapter 4: Transitional provisions

Two transitional periods are already set out in the Amendment Act. The proposed amendment regulations must commence on the same day for the legislation to be operational. The following shows a timeline of the commencement and who is impacted.

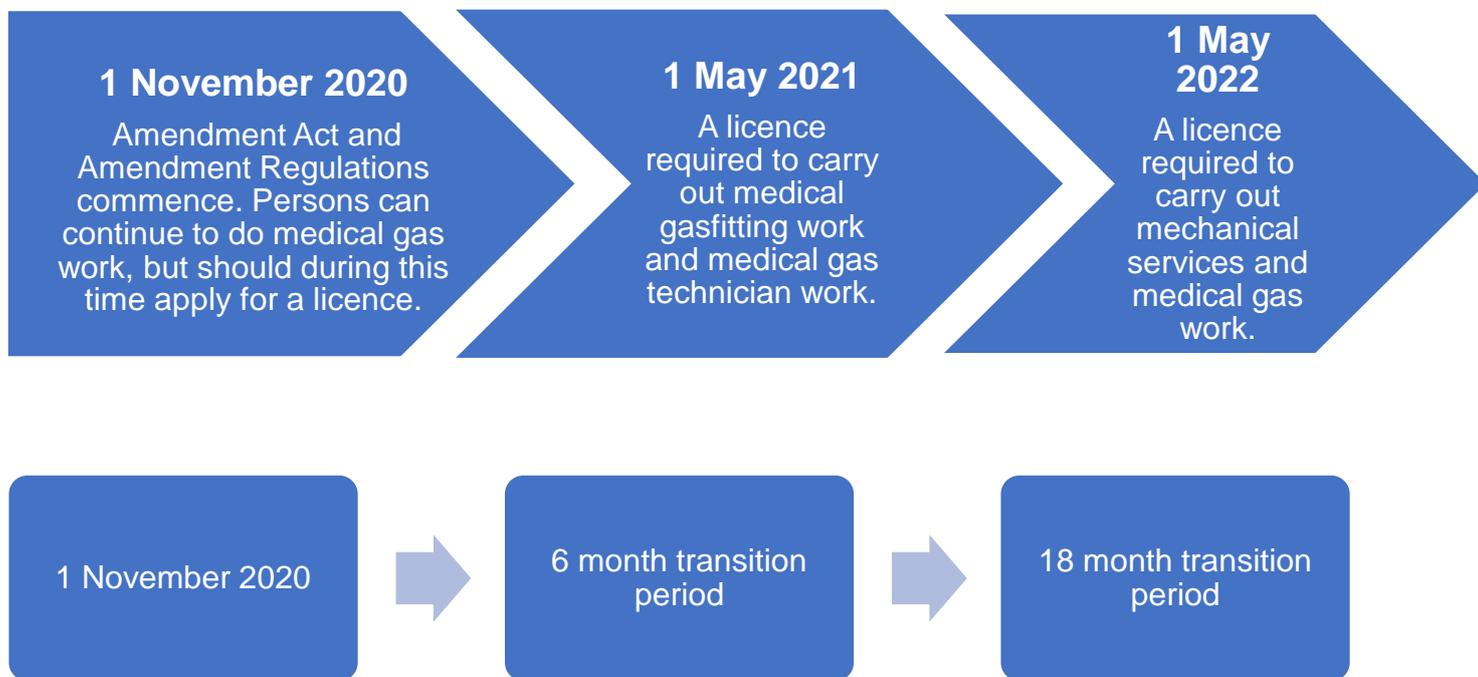


Figure 1: Diagram licensing transitional period

## Appendix 1: Discussion questions

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1. Do you have any comments on the definitions?
2. Should veterinary hospitals also be captured under the law?
3. Are there any other standards that are relevant and should be listed to be complied with? If yes, please provide the standards and the reason why.
4. Is there any more information that should be included in the safety and compliance test notice in new Clause 69C(3)?
5. Are there enough reporting requirements to the Secretary on the testing, and are the requirements suitable?
6. Are the requirements in relation to reporting defective medical gas installation work appropriate? If not, what further directions could be placed on a 'responsible person'?
7. Do you think that the compliance provisions are adequate and fit for purpose? If not, explain why.
8. Are there any factors that should be considered with licensing mechanical services in NSW?
9. Are there any other government departments that should be included in the information sharing arrangements?
10. Do you have any other feedback on the proposed amendment regulations?

## Appendix 2: Summary of the proposed changes to the Regulation

New/existing clause	What the clause does	Reason for the change
Existing Clause 3 – G&E Regulation	Changes to the definition of <b>authority number, responsible person, work provider, qualified person</b> and <b>safety and compliance test</b> .	Machinery changes to incorporate medical gasfitting work, medical gas technician work, and mechanical services and medical gas work in the G&E existing framework.
New Clause 3A - G&E Regulation	Exclude premises used for residential purposes and pathology laboratories from the definition of medical facility.	These places are proposed to be excluded as they do not fall within the scope of the intent of the Amendment Act, as there is no risk to patients.
New Clause 3B G&E Regulation	Include substances as medical gas.	Creates the regulatory basis for the gases within the scope of the licensing framework.
Existing Clauses 42, 44-51	Change to reference from person responsible to responsible person.	Minor change to wording for accuracy.
New Clause 69A G&E Regulation	Include the relevant standards that must be followed. There are seven Australian Standards and one International Standard listed.	The prescribed Australian Standards and International Standards, as they relate to medical gases, and as issued, published or remade from time to time will be required to be complied with.
New Clauses 69B, 69C, 69D G&E Regulation	<p>New clauses that set out the requirements for who can conduct a safety and compliance test, the requirements for notification of results, timing, the information required, and who can carry out the tests.</p> <p>Penalty offences for Clauses 69C and 69D.</p> <p>Clause 69C(4) and 69C(5) – 40 penalty units for a corporation and 20 for an individual. PIN of \$1,100 for a corporation and \$550 for an individual.</p> <p>Clause 69D(1) – 200 penalty units.</p> <p>Clause 69D(2) – 500 penalty units for a corporation, 200 for an individual.</p>	Make it clear what the requirements are for safety and compliance tests and provide appropriate offences for individuals and work providers for not adhering to the requirements.
Existing Clause 70 G&E Regulation	Set out who is the responsible person for notification of a serious medical gas accident.	Make it clear that in the case of a serious medical gas accident, the person apparently in charge of

New/existing clause	What the clause does	Reason for the change
		the medical facility concerned is a prescribed person.
Existing Clause 71 G&E Regulation	Incorporate medical gas accident into the regulation provisions.	Add in a reference to Section 5A(2) of the G&E Act, definition of serious medical gas accident.
New Clause 72A G&E Regulation	<p>A new power for authorised officers to issue a notice to rectify defective work for medical gas installation work, electrical installation work and gasfitting work.</p> <p>Penalty offences in this clause.</p> <p>Clause 72A(2) – 100 penalty units for a continuing offence and 50 penalty units for each day the offence continues.</p> <p>Clause 72A(4) and (5) – 100 penalty units for a continuing offence and 50 penalty units for each day the offence continues. PIN of \$1,100 for a corporation and \$550 for an individual.</p>	To ensure the safety of medical gas installations and provide that defective medical gas installation work is rectified in a timely manner.
Schedule 3 – Penalty notice offences G&E Regulation	Prescribe a penalty notice offence for the purposes of Section 66 of the G&E Act. PIN of \$2,000 for sections 38D(1) or (2) of the G&E Act.	Insert penalty notice offences for new sections in the G&E Act and new clauses in the G & E Regulation.
Clause 14 Home Building Regulation	List the three new categories of work – medical gasfitting work, medical gas technician work, and mechanical services and medical gas work for the purposes of the Home Building Regulation.	Machinery change.
Clause 26 Home Building Regulation	Removes the exemption in Clause 26(1) for medical gasfitting, medical gas technicians, and mechanical services and medical gas work as these persons should be required to be licensed under the Act if they do work on premises they own or premises owned or occupied by their employer, such as a private hospital or clinic.	Clarifies that persons undertaking new categories of specialist work are not exempt from holding a licence for work done in relation to their own premises or premises they reside in, or in premises owned or occupied by the holder's employer.
Clause 71A Home Building Regulation	Include the Ministry of Health and SafeWork NSW as agencies to share information with.	Facilitate information sharing between the relevant government agencies.
Clause 72 and 73 Home Building Regulation	Minor change to refer to the Department of Customer Service rather than the former Department of Finance, Services and Innovation.	Machinery change.
Schedule 4 Home Building Regulation	Detail the extended descriptions of work of mechanical services and medical gas work,	Accurately reflect the description of the work that is authorised for

New/existing clause	What the clause does	Reason for the change
	medical gasfitting work and medical gas technician work.	the specialist work for the three new categories.
Schedule 7 – Penalty notice offences Home Building Regulation	List the penalty notice offences for the purposes of sections 15A, 15B and 15C of the Home Building Act. PIN of \$500 for an individual for 15A, 15B and 15C.	Insert penalty notice offences for new sections in the Home Building Act.

*Table 1: Summary of the proposed changes in the amendment regulations*

## Appendix 3: List of stakeholders

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The following key stakeholders have been provided with a copy of the proposed Amendment Regulations and this consultation paper:

Medical fraternity:

1. Australian Dental Association
2. Australian Medical Association
3. Australian Private Hospitals Association
4. Australian Society of Anaesthetists
5. Day Hospitals Australia
6. NSW Operating Theatres Association

Gas suppliers and installers:

7. Air Liquide Health Care
8. Australia New Zealand Industrial Gas Association
9. BOC Limited
10. Coregas
11. HosLab

Interested parties (plumbers):

12. Master Plumbers Association
13. Plumbers Union NSW
14. Plumbing Industry Climate Action Centre

Interested parties (other):

15. Aged & Community Services
16. Engineers Australia
17. SC Medical
18. Insurance Council of Australia
19. Leading Age Services Australia
20. Veterinary practices