



In response to requests for clarification regarding the rules for manifested products, the AWA has provided the following key message. Excerpt from the National Construction Code (NCC) Acceptable Construction Practice Clause 3.6.4.6 (DTS – Deemed to Satisfy).

Visibility of glazing

a) If the presence of glazing in a door, side panel or panel capable of being mistaken for a doorway or opening is not made apparent in accordance with 3.6.4.3 (b)(iii), the glass must be marked to make it readily visible in accordance with (b).

(b) Marking must be in the form of an opaque band not less than 20mm in height located so that—

(i) the upper edge is not less than 700mm above the floor; and the lower edge is not more than 1.2m above the floor.

1. Making the glass visible by marking is not a substitute for the use of safety glazing in accordance with this Part.
2. A broken line or patterns may be an acceptable form of marking provided it meets the criteria set out in 3.6.4.6(b).

c) A band or marking is not required where any of the following applies:

- (i) The height of the glazing is not more than 1 m in any part.
- (ii) The width of the glazing panel is not more than 500mm in any part.
- (iii) There is no glazing within 500mm of the floor
- (iv) The glazing is provided with not less than one fixed glazing bar which must—
 - (A) be firmly attached to the stiles to locate and protect each face of the glass; and
 - (B) be located with its upper edge not less than 500mm and its bottom edge not more than 1m above the floor; and
 - (C) have a face width not less than 40mm.

Excerpt from AS 1288:2006, Clause 5.19 MAKING GLASS VISIBLE (MANIFESTATION)

5. 19.1 General

If the presence of glass in a door or side panel is not made apparent by stiles, rails, transoms, colonial bars, other components of the glazing system, or other decorative treatment, such as being opaque or patterned, the glass shall be marked to make it visible.

Where the NCC requires access for people with disabilities, glazing in buildings shall be marked in accordance with AS 1428.1.

5. 19.2 Panels other than doors and side panels

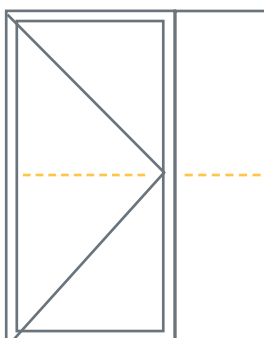
If a panel can be mistaken for a doorway or opening the glass shall be marked to make it visible.

5. 19.3 Marking

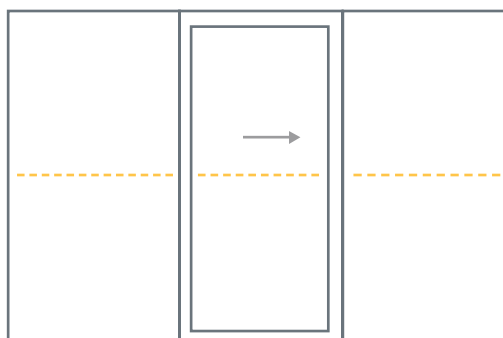
Marking, where required, shall be in the form of an opaque band not less than 20 mm in height and located so that the vertical distance from the floor level is—

- (d) not less than 700 mm from the upper edge of the band; and
- (e) not more than 1200 mm to the lower edge of the band.

The band shall be readily apparent. This may be achieved either by ensuring that the band contrasts with the background or by increasing the height of the band.



Door with sidelight



Sliding door with sidelight



Capable of being mistaken for a door



Making glass visible by marking is not a substitute for the use of safety glazing where it is a requirement of this Section.

NOTES:

- 1 A broken line or patterns using company logos may be acceptable form of marking provided it meets the other criteria set in this Clause.
- 2 Glazing in buildings where the NCC requires access for people with disabilities, should be marked in accordance with AS 1428.1.

Excerpt from AS 1428.1:2009 (incorporating Amendment 1)
Design for access and mobility Part 1: General requirements for access - New building work.

6.6 Visual indicators on glazing

Where there is no chair rail, handrail or transom, all frameless or fully glazed doors, sidelights, including any glazing capable of being mistaken for a doorway or opening, shall be clearly marked for their full width with a solid and non-transparent contrasting line. The contrasting line shall be not less than 75 mm wide and shall extend across the full width of the glazing panel. The lower edge of the contrasting line shall be located between 900 mm and 1000 mm above the plane of the finished floor level. Any contrasting line on the glazing shall provide a minimum of 30% luminance contrast when viewed against the floor surface or surfaces within 2 m of the glazing on the opposite side.

NOTE: For methods of testing luminance contrast, see Appendix B of AS 1428.1:2009

The AGWA sought legal opinion to clarify the onus of responsibility for the luminance contrast requirements of this Australian Standard. That opinion is that it should not be the responsibility of the window supplier to decide what contrasting colour is to be applied, and window suppliers should note on any quote or order that compliance with AS 1428 is the responsibility of the purchaser.

Relationship to Windows and Doors

The Australian Standard for Windows, AS 2047, is also referenced in the NCC for all classes of buildings and incorporates glazed doors that are technically considered to be large windows.

To claim compliance to AS 2047, window manufacturers must select the glass in accordance with the current version of AS 1288. As you can see the requirements in both documents are essentially the same and they do reside within NCC-DTS and the normative section of the Standard.

Glazed doors without manifestation as specified by the Standard would constitute non compliance with both the Standard and the NCC.

The way that most members protect themselves:

1. Ensure that the motif has some sense of permanency which includes etched or applied that are difficult to remove (kiss or security cut). They cannot be able to be pulled of easily. Our advice legally is that permanent means only that it should be obvious that it should not be removed.
2. Have a clause in the supply contract that states that these products have been manifested in accordance with the NCC and AS 1288:2006, clause 5.19 and should not be removed. Make sure that the contract is signed.
3. Never, during installation or delivery, indicate or agree that motifs can be removed, even after you have left.

Once you have finished the job, you have no control over what happens, so you can only control what you supply. The above steps give some legal support that you have acted with a duty of care.

Standard industry practice is to have etched markings on door leaves to ensure compliance. Many window companies do this and have their specific company design lodged with their glass supplier.

It is up to the purchaser of the window and door systems to select the product. If your direct customer has purchased and installed on behalf of a homeowner, they should have and would most likely have made the selection in conjunction with them before contracting with you.

Disclaimer: This key message has been developed to provide general guidance, awareness and education to AGWA members only. It should not be viewed as a definitive guide and should be read in conjunction with the requirements of the National Construction Code (Visit www.abcb.gov.au). While every effort has been made to ensure the information is accurate the AGWA expressly disclaims all and any liability to any person for anything done in reliance on this publication. No responsibility is accepted by the AGWA for any mistakes, errors or omissions in this publication.

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