

**To the PRODUCTIVITY COMMISSION**

**RE: REVIEW OF AUSTRALIAN GOVERNMENT'S RELATIONSHIP WITH STANDARDS AUSTRALIA LIMITED AND THE NATIONAL ASSOCIATION OF TESTING AUTHORITIES, AUSTRALIA**

From the experience of a small architectural practice, there is need for more effective use of Standards and the current situation in relation to Standards Australia Limited is poor and affects small architectural business productivity.

I understand in undertaking the study the Commission is to examine and make recommendations on:

- a. the efficiency and effectiveness of standards setting and laboratory accreditation services in Australia;
- d. the appropriate means of funding activities of Standards Australia Limited and the National Association of Testing Authorities, Australia, which are deemed to be in the national interest.

And also in preparing the report, the Commission is to have regard to:

- the cost impact on and benefits to business and the wider community of standards, including in regulation; and

The following will address the three points in order from the perspective of my practice.

**a. The efficiency and effectiveness of standards setting in Australia.**

The efficiency and effectiveness of standard setting is only achieved in the EXECUTION. There is no point having a standard that nobody is using, or referring to.

This architectural practice uses an Australian Standards based specification for building works. The concept behind this is that the standard or work we desire to occur on site would be in accordance with Australian Standards. There are many standards now that cover much of the building process.

This situation has two serious problems.

The first is that it is so expensive for a small practice to buy all the standards we refer to that we don't have all the current versions of the standards in the office. The standard may be accessible from our local library, where we may or may not be able to print out the relevant portion, but this method of access involves a significant cost as someone has to go out of the office for some time, and may have to take notes by hand. We, therefore, cannot use the full power of this specification technique.

The second problem is that the builder on a smaller job, who is to do the pricing for a job based on that specification, is likely not to have all the standards that are referred to. Again for the same reason as a small architectural practice does not have all the standards, as to have all these standards as current is a significant cost that a small business cannot afford. Even the trades themselves may not have all the current standards the architectural specification refers to. What is worse is that when it comes to construction the standards are not referred to, as again, the builder on a smaller job is unlikely to have a current copy to hand of all the standards referred to. The only time a standard is referred to, is in the situation where there is a dispute on site.

From figures from the Master Builders Association the building industry in Australia is made up of a lot of small players. That current standards are not being referred to regularly in the construction of small buildings is likely to be widespread. At this end, there is little effectiveness, let alone any efficiency, in standards.

They are simply just unaffordable.

**d. The appropriate means of funding activities of Standards Australia Limited which are deemed to be in the national interest.**

At present a standard of less than fifty pages can cost up to \$100. It cannot cost this much to print them.

If a country wants its builders to build the built environment to an agreed specific standard, the information regarding these standards should be easy to access and to be as close to free as possible to those who need to use them to carry out the work.

We have an absurd situation that only those with time (who don't desire to make much money) and the large companies can afford to build in accordance with all the standards.

- **the cost impact on and benefits to business and the wider community of standards, including in regulation.**

This practice cannot afford all the standards it would like. It cannot afford the time to go to the library. This is probably preventing innovation and information from changes and improvements reaching practice on the building site.

At this stage I would spend up to \$300 on standards per year on top of the amount required to upgrade the building code each year. This cost represents 2% of the after tax income of this practice. I have to do a small job to pay for having the standards I do have. I simply cannot afford the \$3000 that was required for 25 key building standards all together, plus the few others I may like to have. I know that I have to pay again later to update these standards, and, an update may be the very next year!

The benefits of having the standards freely available may be immense. But I could not gauge this. They have never been either easily accessible or freely available since I have been involved in the construction industry. The two that I have maintained consistently are the car parking and disabled access codes. Other codes have only generally been used in the case of disputes regarding quality on site.

In other words that fact that the standard is not freely available may mean that the buildings are being built with little reference to standards, and we only notice this when the trade is so bad their work brings a question as to “what is the standard anyway?” This practice means the building industry is less than efficient as there is a significant cost in rectification.

If you have any questions please do not hesitate to contact the undersigned,

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