

To the PRODUCTIVITY COMMISSION

RE: Standard Setting and Laboratory Accreditation Productivity Commission Draft Research Report

The Key Points on page XIV for standard setting do not mention that a major issue in regards to standard setting is implementation by the industry as there is a barrier due to prohibitive cost.

In Access to Standards a point should be made that due to people in industry not accessing standards due to cost, standards are not being used.

In Draft Recommendations The Draft Recommendation 7.3 is not carried through to 7.4

Draft Recommendation 7.3 is for low cost standards, whereas Draft Recommendation 7.4 is made on the basis of the standards being high cost. In any case unnecessary cross referencing is partly due to poor information management.

It should be the aim of Standards Australia to produce coherent and self contained standards, a lack of clarity is a barrier to industry implementation, especially as the building industry references them in documents contracts, making them a legal requirement for a contractor to meet. Any standards document that contains unnecessary complexity makes determining the compliance to it on site more difficult.

Draft Recommendation 8.2 begins to address the issue of how to make the standards more user friendly for trades and contractors. There could be a recommendation that industry bodies such as Engineers Australia and the RAIA be involved in the consultation process

However, the Draft Recommendations do not address how the standards can be more accessible to the people who build things. For example, how can a plumber be kept up to date? How does he know the standards applicable to his work are the latest?

There should be a recommendation that seeks to involve the industry in feedback in using the standards in practice and familiarity with updates and new ways of doing things, or at least issues that have arisen from old ways of doing things.

The construction industry, which is a large segment of the Australian economy, and which produces the buildings which people experience, and which affect their safety, seems to be poorly able to transmit information regarding exemplar construction practice let alone innovation.

Chapter 5 Overall assessment Key Points (pg 59 and 63 transparency and consensus)

Could it be added to the second point on the process that SA uses that when a standard affecting the work of an industry body such as the RAIA is revised that it be reviewed by

that body. This would serve two purposes. Firstly the body would be made aware of the new standard and secondly a broader range of industry experience could inform the standard.

Chapter 7 Key points

There is no real problem with referencing standards to other standards if they are free and accessible. It would be preferable to have standards complete, but in many cases it is better to separate standards into manageable chunks of information with a recognized subject. This point may be better addressed to standards clarity.

Cost and access

Standards affecting human safety and/or referenced in the building code should be free and publically available.

Other issues affecting efficiency and effectiveness of standard setting

The report makes much of the importance of standards setting but misses the point that no matter how good standards are they are useless if they are not implemented.

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.

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.

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. Without accessible standards 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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