The draft recommendations contained in the Productivity Commission's Draft Research Report 'Standard Setting and Laboratory Accreditation' are moving in the right direction.

Of particular value are the observations in regard to accessibility of legal requirements (page 114 of the draft). Standards referenced in the Building Code of Australia effectively become part of the legal framework with which architects, other consultants and builders have to comply. As the Commission has pointed out: 'Accessibility of legal requirements is a fundamental aspect of regulatory transparency'. The present situation, in which we in the building industry have to pay dearly simply to find out those legal requirements with which we have to comply, contravenes this principle of accessibility and transparency. The present situation, in which SAI Global has a financial interest in a proliferation of standards, and frequent revisions of standards, is inequitable.

In my view, two steps are required:

- 1. The relationship of Standards Australia with SAI Global needs to be unwound.
- 2. The activities of Standards Australia need to be funded by government. (There is nothing new in this. For most of its history, Standards Australia has been funded by government. This is appropriate for an organization performing a public service. The production of standards should not be regarded as a revenue generating source. This simply results in a proliferation of standards, encumbering rather than supporting industry).

It is vitally important that all standards referenced in the Building Code of Australia be available free online. All legislation of the NSW parliament is freely available online. There is no sensible reason why these standards regulating the building industry should be any different.

The above proposals will have the following benefits:

- 1 They will remove the perception that there is a financial incentive to produce as many standards as possible, and to revise these as frequently.
- 2 They will enable the possibility of a reduced number of standards, with resultant improvements in efficiency for industry.
- 3 They will separate Standards Australia, a not-for-profit organization, from its profit-motivated partner (SAI Global). In the perception of industry, these two organizations presently form an uncomfortable alliance.
- 4 They will remove the present inequity in which volunteers contribute their time to formulation of standards, only to see others profit from their intellectual capital. The trend in declining volunteer participation could then be reversed.