

4th August 2006

To whom it may concern,

PRODUCTIVITY COMMISSION TO EXAMINE AUSTRALIA'S STANDARDS AND LABORATORY ACCREDITATION BODIES

We are writing to comment on the above draft report, with particular reference to the use and availability of Australian Standards (AS) documents in the practise of Architecture. We are a small Architectural Practise located in Byron Bay, NSW.

Draft Recommendation 7.3

We would like to express our approval of Draft Recommendation 7.3, which advocates the provision of low cost access to all AS referenced in Regulations. This would be hugely beneficial to Architectural practises that are required to be familiar with and abiding by a huge number of standards as referenced by the Building Code of Australia (BCA). The cost of purchase of all such standards is extremely prohibitive to any one practice and while the standards are available electronically at libraries, access is not always practicable or for that matter economical, especially in rural regions.

We would like to suggest that access to the AS be incorporated under professional registration. In the case of Architects this would mean that registration with the Royal Australian Institute of Architects (RAIA), and the payment of the significant attendant fees, would provide one with a subscription to access the necessary AS. Access would ideally be on-line, in a similar format to the information provided in public libraries. Similar access could be provided via subscription through other professional bodies/industry groups, with each subscription tailored to be industry specific. The professional body in question could perhaps lease or head-subscribe the AS from SAI Global and would be responsible for the on going updating of the standards, greatly increasing the currency of information to its members. Alternatively SAI global may allow direct access to its own online library via registered password holders under some head agreement.

Draft Recommendation 7.4

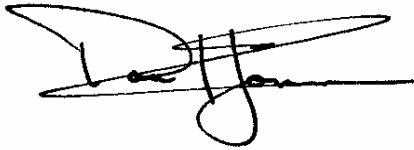
In regarding to Draft Recommendation 7.4, we would be happy to see a minimisation of cross-referencing within the standards. We would also like to raise the other related problem of single standards being split into multiple sections.

A specific instance of that illustrate both these problems related to the release of AS NZS 2890.1-2004 Off-street car parking.pdf. The previous standard (AS 2890.1-1993) contained all information required for the design of disabled parking spaces. The new standard no longer contains that information, instead referring one to AS NZS 2890.6, which, as of August 2006, has not been written. Enquires with SAI Global refer one back to the original AS 2890.1-1993, although when purchasing the new standard no warnings were

given about the continuing relevance of the standard being replaced. It seems extremely inappropriate that two editions of the same standard must be used concurrently to comply with the regulations. It also seems unfortunate that when the further standard AS NZS 2890.6 is finally written, an extra fee will need to be paid for information that was previously contained quite easily in one page.

Thank you for the opportunity to comment on this important issue. We firmly believe simplification of the AS structure and retail policy is required for it's continued effectiveness.

Regards,

A handwritten signature in black ink, appearing to read 'Paul Jones', with a large, stylized flourish at the end.

Paul Jones.

Inc. Submission Cover Sheet