10th May 2006

Maggie Eibisch
Standards & Accreditation Study
Productivity Commission
PO Box 80
Belconnen ACT 2616

Dear Maggie,

Thank you for the opportunity to submit our response to the productivity commission.

Introduction

AIRAH has a long and proud history of representing an industry of professionals, who are of fundamental and increasing importance to the comfort, health and safety of the community. Formed in 1920, AIRAH is recognised by government and industry bodies for its expertise across a wide range of issues in the area of engineering services for the built environment.

There are a number of Australian standards that are called up in federal, state and local regulations which affect the way our industry operates. Most of these standards relate to the safety and health of construction industry personnel and building occupants so they are of considerable importance to the welfare of the wider community. These standards cover a range of topics including fire and smoke control in buildings, microbial control for building services, clean room applications and the safe handling of refrigerant gases.

In brief

AIRAH is concerned with the changed commercial arrangements between Standards Australia and SAI Global in that profitability may take precedence over need. We note that most of the recent

- on factory completion;
- on site installation; and
- as regular maintenance testing.

Where this system has been found wanting is in the third part—the regular maintenance testing—where too often the testing is confined to the ‘at rest’ performance of the product. This may have little similarity to results produced when the product is in full ‘operational mode’ and subject to human and environmental impacts that impinge on the effectiveness of HVAC design provision. As a consequence, there is a need to improve the ways and means of training and accrediting testers. Many of the skilled personnel, who have acquired expertise via practical experience, are now retiring from the industry. They may have mentored their junior employees, but this is not a reliable source for the future skilling of an increasingly technical and important part of the workforce. There is a real need to address this issue.

In summary

The present focus of both Standards Australia and NATA appears to be in the creation of a commercially competitive organization that will return significant profits to its shareholders. Both organizations seem to be increasing their rivalry in the pursuit of opportunities for commercial publications and training seminars.

In the case of Standards Australia, concerns have been raised about ethical considerations following the sale of the majority of its shareholding in a previously wholly owned publishing subsidiary—Standards Australia International. A commercial venture is one thing, but to require the services of some 8500 committee volunteers operating across some 1575 technical committees to underwrite large salaries and share portfolios for its directors, plus dividends for large corporate shareholders (SAI Global Annual Report 2004–05) based on the output of those volunteer committees, whose members receive no financial compensation for their time and intellectual property, raises ethical concerns about the current operation of Standards Australia.

Yours faithfully,

[signed]

Phil Wilkinson
AIRAH technical manager