

PRODUCTIVITY COMMISSION – STANDARDS & ACCREDITATION STUDY

The affordability and accessibility of Australian Standards has been a long-term concern of mine as evidenced by the attached documents written in 1987.

We are now nearly 20 years on and nothing has changed – in fact things have worsened as standards are continually updated, more are produced and in many cases are so poorly written that the information they are meant to convey is lost in the complexity. Perhaps they should produce a standard for writing standards!

All of this has a negative impact on the productivity of our nation – it is difficult to keep producing quality products and provide quality services if complex and costly barriers are put in our way. In my experience most people are happy to comply with rules, regulations and standards provided they are easily accessible, readily understood and affordable.

The main issue is accessibility at a reasonable cost. I believe there are a lot of building professionals, contractors and subcontractors that don't have copies of essential standards and can't afford to update them whenever they are amended. This is counterproductive to achieving buildings of a minimum standard which is what I thought would be one of the objectives of Standards Australia. I believe the same applies to other small businesses and manufacturers throughout Australia and the products and services they produce and provide.

The idea that we might buy an "Architects Package" for \$6,000 on top of the annual \$330.00 Standards Australia membership fee we pay is laughable and shows a complete lack of appreciation by Standards Australia of our situation.

It is not necessary that we each hold a hard copy of all relevant standards in our office or business but it is essential that we have access to them quickly and at a reasonable cost to ensure that they are used properly by professions and industry. This could be achieved by having a reasonable annual subscription fee that would allow access to any standard on-line but not copy it or print it out - if a hard copy was required this could be downloaded at an extra cost on an "as needs" basis. This would save printing costs, paper, etc.

I find it amazing that the hierarchy at Standards Australia can't see that making access more affordable will increase the number of subscribers, use of standards and without reduction in their total income but maybe I'm dumb!

Many government regulations are now freely accessible or available on-line and this advances knowledge and encourages compliance. A good example is the Occupational Health & Safety Regulations for each State ... pity that some of them then refer to Australian Standards which have to be purchased at an exorbitant cost ... how does that encourage safety?

My concerns are echoed by others, including those involved in the writing of Standards, as evidenced by the following comments sent to me by colleagues last year.

"I have represented the Institute on a number of Standards Australia committees, and so have some insight as to the manner in which these standards are prepared. In my experience, the Standards are prepared by a group of experts who contribute their time at no cost to Standards Australia (Standards Australia may sometimes pay the airfares of interstate committee members).

The cost to Standards Australia in preparing an Australian Standard is limited to the supply of a committee meeting room, the committee secretary, tea and coffee and occasionally sandwiches for lunch, word processing, and printing and distribution of the standard.

If I want access to an Australian Standard (other than one I helped prepare - Standards Australia do reward Committee members with a free copy) I can either go to one of the few libraries in Sydney that stock the Standard, or I can buy the document from Standards Australia either as a printed version or a PDF, at what I consider to be an outrageous price.

If I want access to the Building Code of Australia I also have to buy the document or buy a subscription or go to a library.

A relevant comparison is Acts of Parliament - NSW or Australian.

If I want access to any Act of Parliament I can simply go onto the Web and go to a site such as the Australian Legal Information Institute <http://www.austlii.edu.au/> and call up the legislation and case history. Easy, and free.

In my opinion, access to Australian Standards and the BCA should be as simple and as inexpensive as access to Acts of Parliament. I recommend that access to the Building Code of Australia and Australian Standards be made available on the Web for no charge. This would assist the building industry generally - architects and builders and importantly also the people these codes are really written to protect - consumers."

and the following from TILE TODAY Issue # 47 under the section "LETTERS, EMAILS & FAXES" page 102 (I have edited out a few lines)

"Dear Editor,

Recently you have published quite a few articles on waterproofing in Tile Today....However, I refuse to buy a copy of the latest Australian Standard (AS 3740) on domestic waterproofing.

This standard is not worth the money. I refer to its size and physical quality - not to knowledge content. I must admit that I was rather surprised at the cost of the publication.....

.....

The AS 3740 in its present format looks cheap and is no more than a glorified photocopy. No wonder so many tilers either don't buy a copy or shares copies.

My employer had to buy two for us (his tiling team) to share because none of us would buy a copy.

It would appear that Australian Standards are making huge profits selling these cheap format publications. Australian Standards should lower the price of their publications because tilers all seem to be saying the same things: "too expensive", "not worth it", "I won't buy a copy at that price."

No one at Australian Standards seem to want to say why their books can't be sold at a cheaper price. Perhaps an influential and respected magazine like Tile Today might have better luck in finding out.

Sincerely,

John Raferty"

My colleague noted that *Tile Today* provided a response that basically said they thought this particular standard was "quite reasonably priced when compared to other standards publications. A hardcopy of the AS 3740 publication currently retails at \$71.72." (My colleague and I beg to differ). *Tile Today* also added that "Standards Australia did not comment; however the Standards' retailer SAI Global did." I won't type it all but SAI Global's argument for their pricing is based on "intellectual property".

The question is: at what point does LEGISLATION become embroiled in "INTELLECTUAL PROPERTY".

The situation is out of hand and needs to be changed urgently if we are to become the innovative and imaginative nation that we envisage. Perhaps this is best summed up by one of my colleagues who noted that we will have achieved something when Standards Australia can proudly and legitimately use the use the following as their vision statement...

Australian Standards....Accessible & Affordable

[LETTERHEAD:
KEVIN DEBNAM ARAIA

ARCHITECT]

14th March, 1987

Standards Association of Australia, P.O.
Box 458,
NORTH SYDNEY, NSW 2060

Dear Sir,

Whilst I am appreciative of the work of the Association in compiling quality and safety standards for Australian products and practices, it is my opinion that it is time the Association reviewed and revised the format of its publications.

Perhaps what is needed is an Australian Standard covering the production of Australian Standards. I note at the moment that no such standard exists.

I have reached this opinion because I feel that Australian Standards have become far too costly to purchase initially and to update regularly, especially for those in the small business sector.

This is a particular problem for those businesses involved in the building industry where it appears that standards are revised or amended frequently.

Within my profession I believe that there are a large number of small practices and I would confidently guess that the majority of these practices have a minimal number of standards related to the building industry. Certainly there would be very few, if any, that avail themselves of your Service No. 30 - Australian Standards for Architects which currently costs \$1900.00 for members of the Association and \$2760.00 for non-members. I would be *very* surprised if this situation didn't apply to your Services Nos. 11 and 12 - Australian Standards for Building Regulations in Victoria (\$900.00 members, \$1370.00 non-members) and NSW (\$666.00 members, \$988.00 non-members) respectively.

In regard to these latter services I believe that there would also be very few smaller builders that would subscribe to your standards.

If this is a reasonable reflection of the current state of affairs then I believe that it is to the detriment of the architectural profession, the building industry and the community. Perhaps it partly explains some of the current problems within the industry which is continually struggling to keep pace with changes in technology.

The current system of producing, amending and updating building standards is expensive, inadequate and outmoded. It doesn't take long before a standard, with its amendments included, looks like Norman Gunstan's face after a shave. It is very difficult to quickly obtain and reference information in such a collection of bits and pieces of paper.

There are better systems of documentation around and one only. need look at the current Victorian Building Regulations or the regulation services provided through the Law Book Company and Butterworths to appreciate the benefits of these systems. The greatest benefit of these systems is that documents are produced in a loose-leaf form rather than a bound form and consequently any amendments can be incorporated easily and neatly in a reprint of the relevant page rather than of the whole document. Reprinted pages draw attention to the amendments that have been made and are quickly and easily incorporated into the document.

I believe such a system can be produced and updated at a lower cost and would encourage more people to purchase and subscribe to the Association's Services. Ultimately this could only benefit the community by increasing awareness of standards for products and practices and thereby increase the probability of these standards being achieved.

I hope that these ideas are considered as constructive criticism and would be interested in your comments.

Yours faithfully,

[signed]

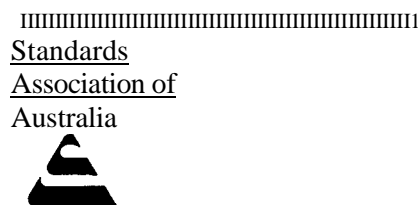
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c. c. Executive Director, RAI A NSW Chapter.
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Our reference
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1987-04-16



Mr K Debnam, ARAIA
Architect
465 Olive Street
ALBURY NSW 2640

Dear Mr Debnam

Thank you for your letter of March 14 - my apologies for the delayed response, but I have just returned from a couple of weeks leave.

The price of Australian Standards worries us too, and we try to keep all our prices down. Regular and cost effective plant and equipment investments improve our overall productivity, and we try to pass on worthwhile savings to members.

We regularly compare prices (per page) of Australian Standards with a ' basket' of overseas standards at their own domestic costs. Last year the comparison showed Australian documents, on average, amongst the cheapest of any country.

Over the years thought has been given to looseleaf amendments, but most feedback suggests this is impractical. There is a low chance that page numbering can be observed, sheets become lost or are not inserted, and probably most important, it becomes very difficult to precisely identify a complete document - this is important to governments since about 30% of our inventory of 4000 Australian Standards are cross referred by AS numbers and date, in regulations.

I apologize. if I sound negative, but our opinion is that in the broader context there is little to be gained from moving away from the present system. This incidentally, appears to be the view of the majority of other national standardizers too.

Thank you sincerely for the time you have taken to write.

Yours sincerely

[signed]

Stewart Horwood
DIRECTOR-TECHNICAL

AUSTRALIAN MEMBER
INTERNATIONAL ORGANIZATION FOR
STANDARDIZATION.
INTERNATIONAL
ELECTROTECHNICAL COMMISSION

INCORPORATED BY ROYAL CHARTER

Attachment 2

2 page Article by Louise Cox “Australia at the forefront of contemporary building Standards”

in *The Global Standard Magazine*, Feb 2004

<http://www.sai-global.com/newsroom/tgs/2004-02/zzpdffeb04/zzpdffeb04.htm>

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Attachment 2