

June 6, 2025

National Competition Analysis 2025
Productivity Commission
Locked Bag 2, Collins St. East
Melbourne VIC 8003

Submitted via comment letter: www.pc.gov.au/inquiries/current/competition-analysis-2025

RE: National Competition Policy Analysis 2025 – Call for Submissions

Dear Productivity Commission,

Autodesk (“we”, “us”, or “our”) appreciates the opportunity to provide comments on the Productivity Commission (PC)’s National Competition Policy Analysis 2025. We support PC’s efforts to review and refresh National Competition Policy principles and we would like to support development of these reforms by responding to “Information Request 2” related to adopting overseas standards in regulatory frameworks and harmonizing regulated standards across Australia.

As a global leader in 3D design and engineering software, Autodesk helps engineers, architects, public sector asset owners, and contractors design, build, and operate infrastructure. Autodesk’s technology connects processes and workflows to align teams at every stage of a project and enables users to unlock value that comes from making their infrastructure projects more efficient and more cost effective. Autodesk is headquartered in San Francisco, United States and has approximately 7 million subscribers globally.

Autodesk works with policymakers around the world to create public policy that drives more innovative, cost-effective, and productive outcomes in infrastructure, as the industry shifts from sharing project data through printed drawings and reports to an era in which most project data is digital. According to available data, greater and standardized use of digital tools and processes in infrastructure design, development and operations can achieve a 15% reduction in public construction costs^[1], a 40% reduction in unbudgeted changes^[2], and an increase in employee productivity ranging from 75 to 240%^[3], creating new opportunities for policymakers to drive greater productivity in the infrastructure sector by better utilising digital data.

Furthermore, in a 2010 study, Australia’s Built Environment Innovation and Industry Council (BEICC) used national survey data on the take-up of Building Information Modelling (BIM) and a Computable General Equilibrium (CGE) economic modelling framework to conduct an economy-wide analysis of the impacts of accelerated, widespread BIM adoption on the Australian economy between 2011 and 2025, relative to a “business-as-usual” adoption scenario. This study found that there were direct benefits of increased BIM adoption in the form of cost savings to four main user groups - Architects (6.5% to 11.8%), Engineers (2.7% to 9.4%), Contractors (0.8% to 9.2%) and Asset Owners (0% to 9.2%) – and estimated these direct cost savings (productivity gains) in the construction sector could, in turn, boost Australia’s overall economic output (GDP) by 0.2 basis points annually.

It is in this context that we would like to respond to several specific question prompts in “Information Request 2:”

^[1] UK Infrastructure & Projects Authority (2016). “Government Construction Strategy 2016-20.”

^[2] Stanford CIFE (2007). “Building Information Modelling (BIM): Benefits, Risks and Challenges.”

^[3] Poirer et al., 2015, Measuring the impact of BIM on labour productivity in a small specialty contracting enterprise through action-research.



- a. *Are there examples of ... government regulation where there should be greater harmonisation with international or overseas standards? What sectors should be prioritised for reform?*

In December 2018 the International Organisation for Standardisation (ISO) published ISO 19650 as the standard for organising information about construction works. It “sets out the concepts and principles for the business processes across the built environment sector in support of management and production of information during the lifecycle of built assets, when using BIM, ... the use of a shared digital representation of a built object (including buildings, bridges, roads, process plants, etc.) to facilitate design, construction and operation processes to form a reliable basis for decisions.” In 2019 Standards Australia published a national annex to ISO 19650 and the National Specification System of Australia (NASTPEC) has published a National BIM Guide that includes a suite of documents to implement BIM on a project, including an appendix on ISO 19650. We suggest that the Productivity Commission recommend Federal and State Governments to encourage greater use of ISO 19650 standards in public infrastructure projects to achieve greater adoption of BIM.

- b. *What is the impact of a lack of harmonisation (e.g. compliance costs ... on multinational businesses)?*

Many medium-to-large sized businesses in Australia’s Architecture, Engineering, Construction & Operations (AECO) sector operate in multiple jurisdictions; as a result, a lack of harmonized standards creates additional costs to these businesses in terms of additional resources to manage and comply with multiple standards, thereby reducing productivity. A report from the University of Cambridge’s Centre for Digital Built Britain on the value of information management (defined as adoption of Building Information Modelling and broader digital transformation activities) in the construction and infrastructure sector not only quantifies the economic case for investing in information management, including direct productivity gains for organisations, but also how regulatory standardization results in increased productivity in the form of costs saved and avoided and increased output (Figure 10).

- c. *Are there any reforms that should be made to Australia’s standards ... to support greater harmonisation while still addressing specific Australian risks and objectives?*

We suggest that the Productivity Commission recommend Federal and State Governments establish guidelines that suggest public infrastructure owners include the ISO 19650 standard in tenders, so that this standard is contractually enforceable.

We appreciate the PC’s consideration of our comments. If you have any questions, please contact me at the address below.

Best regards,

Courtney Lutterman

Director, Government Affairs & Public Policy, Asia-Pacific Japan