

7 October 2004

Productivity Commission
Reform of Building Regulation
PO Box 80
BELCONNEN ACT 2616

REFORM OF BUILDING REGULATION

AMCA welcomes and appreciates the opportunity to comment on the draft research report on the reform of building regulation.

The association wrote to the inquiry in a letter dated 29 April 2004, setting out our views on a number of issues raised in the discussion paper. The association re-commits itself to those views expressed at the time and does not see any need to alter them in the light of the draft report.

There are however a number of matters that we wish to re-emphasise or raise that were not dealt with at that time. These matters are briefly summarised.

- **Industry Appointments**

AMCA submits that the Australian Construction Industry Forum (ACIF) is the appropriate body to appoint industry representatives to the restructured ABCB. We note the comments attributable to the Housing Industry Association (HIA) in the draft report. However, AMCA submits that the HIA is eligible to be part of ACIF and from all accounts we would expect their membership to be welcomed by that organisation. ACIF is the broadest based collective voice of the industry, representing professional and trade associations who have an interest in the construction industry. Peak bodies of this nature can and do play an important role to play in providing a coordinated and comprehensive industry view on matters.

- **Funding**

AMCA supports the existing funding arrangements. In order for the ABCB or its successor to perform its role in the industry, a significant commitment on the part of all governments to fund the organisation is essential.

There is clearly a lack of knowledge and compliance out in industry with respect to requirements of the BCA. We submit that this limitation is attributable in part to the high cost of purchase of the Code. Given the electronic means that is now

available to disseminate information, we suggest that the code should, at least, be freely available to industry in an electronic format.

- Draft recommendation 6.3

This draft recommendation refers to eight plumbing associations for consultative purposes. We believe that the reference should be to the eight plumbing regulators. Perhaps the reference in the report is an error. There are more than eight plumbing associations who have a legitimate and vital interest in this field.

- Insurance

The association notes that the terms of reference for the inquiry do not specifically deal with insurance issues. However, the requirements of insurance, coverage and need is a critical matter for the industry at this time.

Yours truly,

David Eynon
Executive Director