

8 October 2004



**ENGINEERS  
AUSTRALIA  
SOCIETY OF  
FIRE SAFETY**

Building  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616

Attn Tony Hinton

**RE: Productivity Commission 2004, Reform of Building Regulation,  
Draft Research Report, Productivity Commission, August.**

Thank you for a copy of your draft report.

The Queensland executive would like to suggest that your reference relating to consultation in Queensland be altered to reflect that at the meeting in the offices of Arup, you also meet with the chairman of the Society of Fire Safety (Queensland). The chairman was acting independently to the Arup representative.

Our executive has discussed your report and would like to provide further comment with respect to Section 6.9 – Asset protection.

We believe that any recommendation to include property protection in the BCA would represent a substantial change and should be subject to a RIS. The preparation of prescriptive requirements relating to property protection for inclusion in the Deemed-to-Satisfy (DTS) provisions would need to be cost effective. The performance requirements should only be altered when such DTS requirements are resolved. This would allow Fire Safety Engineers to provide suitable building designs that add value to the communities building stock.

The executive also felt that the BCA should include a vision statement where the objective and restrictions of the contents are reviewed for the final clients of the document. These statements should be in simple English and be aimed at the Mums and Dads of home ownership and all the possible property owners including those whose buildings are designed in accordance with Volume 1 of the BCA. This would at least enable them to have an opportunity to understand the extent of regulatory restrictions that are applied to the building design. This may encourage changes to building specifications and designs to reflect insurance requirements, increased property protection, energy efficiency, reduced business interruption etc.

The ABCB should have a vision statement of the long term goals of the composition/format of the future BCA.

For example will the future document be performance based with risk based methodologies and assessment criteria? Will it include Deemed-to-Satisfy provisions and reference documents such as the "Guide to the BCA" and the "Fire Safety Engineering Guidelines"?

This could assist in the alignment of research areas and research funding to produce the final document.

Unfortunately we were unable to review other areas and hope our comments are of assistance.

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