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Reform of Building Regulation
Productivity Commission
P O Box 80
Belconnen
ACT 2616

Dear Sirs,

Review of the Australian Building Codes Board

I regret that this submission will arrive after the 30 April closing date, but I hope it will nonetheless be useful.

My Credentials

I have been a participant in the process of building regulatory reform for some two decades. In Victoria, I was a member of most of the regulatory advisory and administrative bodies that led to the Building Act 1993, and the formation of the Building Control Commission. And through AUBRCC committees and research projects I was also active in the early development of the BCA. In 1999-2000 I was a member of the Deloitte team conducting the performance audit of the BCC and its allied bodies.

My Observations

I do not have enough experience of interfacing with the ABCB to feel qualified to comment in detail on the constitution or the work of the ABCB. However, my general impression is that it is generally doing a good job.

The object of this submission to the your study is to emphasise the "big picture" importance of the ABCB and the BCA. I believe that the following points are important for the future of the building industry and professions in Australia :

- Australia should continue to develop the BCA as a truly Australian (rather than state-by-state) set of building standards.
- Australia should continue to provide input into, and draw output from, the work of international bodies such as the International Standardisation Organisation (ISO) and International Forum of Fire

Safety Engineering Institutions (IFSEI). ABCB could play a coordinating and facilitating role in such Australian international involvement.

- I am convinced that appropriate cooperation between the states in this area is only possible if leadership (which inevitably means money!) is forthcoming from the federal government.
- The moves to performance-based standards, and to privatising the approval process, are bringing real economic benefits to Australia (as shown, in Victoria for example, by the September 1999 CSIRO report to the BCC).
- The potential to export Australian building and design expertise will be further enhanced if the control of building were, as far as possible, done at a Federal level.
- Any set of building standards, such as the BCA, should always be seen as forever changing and developing. Thus there will always be a need for a body such as ABCB to oversee that change and development.
- The building industry in Australia would benefit if the relevant legislation (the Act and the Regulations) were the same in all States. Thus I urge that ABCB should work with the States and Territories towards a uniform Building Control Act. I realise that this concept has already been tried in the form of the Model Building Act, and that the end result has not been particularly successful. Yet there is a precedent for achieving uniformity: the Uniform Arbitration Act is one example of each State passing essentially uniform legislation. Full uniformity of building legislation would greatly enhance the efficiency of the marketplace for both products and labour in the building industry.
- A possible early step towards uniformity of process between the states would be an Australia-wide system of registration for various categories of building practitioner. ABCB could be a champion and facilitator of this concept.

Clarifications ?

If any of these comments and suggestions requires clarification, I would be pleased to be of assistance.

Yours faithfully,

L N Reddaway