



Suite 1.04 , Level 1  
10 Help Street  
CHATSWOOD 2067

Tel: 02 9413 9352  
Fax: 02 9413 9351  
Mob: 0412.991.021

ACN: 068 095 198

---

21 April 2006

SUBMITTED VIA EMAIL

Standards & Accreditation Study  
Productivity Commission  
PO Box 80  
Belconnen ACT

**Review of Australian Government's Relationship with Standards Australia.**

Dear Sir,

The BDAA represents the national interests of non-architect professional building designers. Over the past 15 years these designers have grown in importance in the Australian building industry.

While accurate market share figures do not exist, this association believes that building designers document, design and specify well over 50% of new home activity and significantly more than this in renovations. Past Productivity Commission studies in this area confirm this broad trend.

BDA members belong to state and territory BDA organisations. The BDAA was established in 1995 to represent national member interests. Members are in the majority sole traders. The remainder are design practices of 2-3 employees. As such the members are what the federal government considers micro businesses.

As such BDA members are not in a position to benefit from operational scale thus they find compliance with regulatory requirements a greater relative cost burden than larger design and construction organisations involved in the industry.

This association wishes to comment specifically on item (a) of the terms of reference.

- a. The efficiency and effectiveness of standard setting and laboratory accreditation services in Australia.

This Association believes that the present distribution model chosen for the Building Code of Australia, (BCA) and its associated Australian Standards is fundamentally flawed and as such represents a sub optimal outcome for the federal government and an inefficiency in the market place.

As previously stated this comes about because of the high incidence of micro and small business units represented in the building design industry and particularly among industry leaders who are members of BDA.

While anecdotal, this association has been informed by many of its members that due to prohibitive access costs, building designers have developed a series of different alternate channels to try and keep abreast of the BCA requirements.

These include use of third party technical libraries, prioritising and being selective in purchases, buying some but maybe not all of what is necessary and relying on information sharing amongst members.

This association is aware that preparation and review of the BCA and related Australian Standards relies heavily on volunteer industry representatives giving freely of their time. Few argue over the value of a nationally harmonised BCA. That there remain differences in state requirements is regrettable but understandable in an undertaking of this magnitude. Hopefully uniformity in years to come is possible.

But working against this goal at grass roots level is a flawed and technologically out of date delivery system. As a starter, the BCA and its called up Australian Standards should be freely available to all who are required to abide by these regulations. Funding should be by way of general taxes applied to the industry at large.

This would remove one particularly inefficient side of the present model as it applies to sale of these Australian Standards, where a private organisation has a monopoly and enjoys multiple profits given the many practitioners involved in a supply chain of one single project and the multiple purchasing involved for often the same standard documents.

This breakdown in the distribution model sees the final end customer (client) bearing inflated costs passed on by suppliers.

Recent efforts to reduce the printed delivery costs of the BCA by producing it in book form while commendable fails to address the fundamental point. It should be free or at least available via the web on a "read only" basis for free.

If not "free" then at least like PC software, there should be the facility to purchase at a nominal cost, a non time specific licence to "read only" off the web, the BCA and related Australian Standards, with updates automatically downloaded for free to users as these become available for a small annual renewal fee. Delivery costs are virtually removed and the model would progressively see all practitioners possessing a common data source overtime, something that is not evident at this point and without which the goals of the BCA remain just that!

This association believes that a one time "read only" license fee for the BCA and all Australian Standards of \$250- \$300 maximum would be acceptable with an annual renewal of \$100 maximum. Higher charges could apply for printable copies.

This association further disagrees that Standards Australia should enjoy its present government endorsed monopoly situation. At the very least, seek a second supplier capable of more efficient and lower cost delivery i.e a second supplier for competition.

In summary, the BCA and Standards are government policy and thus delivery should be delivered in the most efficient, no cost/ low cost environment, brought about by use of modern technology (internet) and competitive forces much like the present debate on delivery of telecommunication services.

Yours Faithfully

Greg Donnell - National President  
Building Designers Association of Australia.