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National Fire Industry Association Australia Ltd (NFIA)

Submission to the Queensland Productivity Commission (QPC)

Inquiry into Construction Productivity

2 June 2025



INTRODUCTION

THE NATIONAL FIRE INDUSTRY ASSOCIATION (NFIA)

A Legacy of Protection, A Vision for Queensland's Future



The National Fire Industry Association of Australia Ltd (NFIA), an organisation with a lineage extending to 1926, stands as the pre-eminent national voice for the fire protection industry in Australia. For nearly a century, NFIA has been steadfast in its mission to champion the highest standards of safety, technical excellence, and professional integrity. Our diverse membership, comprising esteemed engineering contractors, specialist designers, certifiers, installers, dedicated service providers, innovative manufacturers, and reputable suppliers – from globally recognised corporations to the vital small and medium-sized enterprises (SMEs) that form the resilient backbone of our sector – is unified by a singular, critical purpose: to protect lives, property, and the continuity of Australia's economic and social fabric through the diligent and effective application of fire safety systems.

The Australian fire protection services industry, generating revenue of approximately \$3.5 billion in 2023-24, is characterised by a notably low market share concentration. Despite the presence of several large multinational entities, the leading four companies constitute just over 10% of the market share. The substantial remainder, some 87.1%, is serviced by a wide array of other dedicated Australian businesses (IBISWorld, 2024, p. 12). This industry structure underscores the imperative for a regulatory and commercial environment that not only fosters fair and robust competition but also insists upon unwavering high standards for every participant. The industry, while considered mature due to the widespread acceptance of fire protection services, anticipates continued growth. Projections indicate an annualised increase of 2.3%, with revenues expected to reach \$4.0 billion by the end of 2028-29 (IBISWorld, 2024, p. 12). This expansion will be significantly influenced by the judicious tightening of government fire safety regulations, the adoption of crucial technological advancements, and the escalating demands driven by population growth. Such demands are particularly acute in the construction of high-rise residential buildings – where fire systems are mandated in every dwelling – and vital institutional facilities like aged-care centres and hospitals, sectors where the imperative for uncompromising fire safety is absolute (IBISWorld, 2023, p. 19).

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SUBMISSION

This submission is presented to the Queensland Productivity Commission (QPC) in a spirit of constructive dialogue and shared purpose. It seeks to illuminate the pivotal, though often under-appreciated, role of the fire protection industry in underpinning the safety, resilience, and indeed the very functionality of Queensland's built environment. By extension, our industry is a fundamental enabler of the State's broader economic productivity and the sustained wellbeing of its communities. We will articulate the proactive measures undertaken by NFIA and its members to lead continuing professional development (CPD), champion best practice, and foster a culture of safety and excellence. Concurrently, it is our responsibility to address, with candour and precision, the critical systemic challenges – the labyrinthine regulatory complexities, persistent training and skills deficiencies, inequitable commercial pressures, and concerning enforcement inconsistencies – that currently impede the industry's capacity to operate at its optimal efficiency and effectiveness.

The NFIA firmly believes that a robust, equitable, and nationally consistent regulatory framework is paramount to achieving these aims. **It must be unequivocally stated that NFIA advocates not for a diminution or dismantling of licensing and regulatory oversight – for these are the very bedrocks of public safety and professional standards – but for their intelligent refinement, their practical and effective implementation, and their equitable application across the industry.** Our objective is to collaborate with the Queensland Government, its agencies, and all industry stakeholders to forge a pathway towards a fire protection industry that is not only highly productive but is unequivocally recognised for its competence, its integrity, and its unwavering commitment to the safety of all Queenslanders. The challenges before us are multifaceted, yet so too are the opportunities for meaningful, productivity-enhancing reform. NFIA, in presenting this submission, seeks to be an integral part of the solution, drawing upon nearly a century of experience and a deep-seated commitment to the Australian community.

UNDERSTANDING FIRE SAFETY AND FIRE PROTECTION - The Systemic Imperative

For clarity, a distinction between *fire safety* and *fire protection* is warranted. **Fire safety** represents the desired societal outcome: an acceptable level of risk from fire, ensuring the protection of life, property, and the environment. **Fire protection** encompasses the array of measures, engineered systems, and rigorous practices employed to achieve that overarching fire safety. These measures include:

- **Active Fire Protection (AFP):** Systems requiring a trigger to operate, such as fire detection and alarm systems, automatic sprinkler systems, and fire extinguishers.

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- **Passive Fire Protection (PFP):** Intrinsic building elements and construction methods designed to prevent or limit the spread of fire and smoke, including fire-rated walls, floors, and doors, and the critical fire-stopping of service penetrations through these barriers.

The efficacy of overall fire safety, and thus the protection afforded to the community, relies profoundly on the correct design, installation, commissioning, and diligent maintenance of these interconnected fire protection systems – often referred to collectively as **fire safety installations** (*Building Act 1975* [Qld] sch 2) or, within specific legislative contexts such as Queensland, **prescribed fire safety installations** (*Fire Services Act 1990* [Qld] s 146J). It is crucial to recognise that it is the **operational integrity of the entire, integrated system**, rather than the mere compliance of isolated components, that dictates its life-saving capability. A fire safety system is only as strong as its weakest link. This systemic reliance means that deficiencies in any single part, or, critically, inadequate practitioner skill or knowledge in executing any aspect of the work, can compromise the whole, thereby nullifying the intended protection. This fundamental principle underscores the imperative for robust regulatory frameworks and unwavering practitioner competency, as a failure in either can have dire consequences for public safety and lead to significant economic loss – a direct antithesis to productivity.

FOSTERING EXCELLENCE: NFIA's Commitment to Professional Development and Industry Best Practice

The NFIA's enduring commitment to elevating professional standards is manifest in its dynamic engagement with **Premium Partners** and **National Suppliers**. These entities are vital collaborators in advancing the science and practice of fire protection. Our Premium Partners Ampac, Antec, Clevertronics, LPG Fire Protection, Victaulic, WMIB and Fire Logbooks Australia make substantial contributions that directly benefit the Queensland industry and community:



- **Significant Investment in Research & Development (R&D):** Many of our partners are at the global vanguard of fire safety technology, committing substantial resources to R&D. This investment (e.g., Victaulic's (2025) global R&D expenditure, Ampac's (2022) development of "world-leading" detection systems, Clevertronics' (n.d.) innovations in emergency lighting, Australian-owned and Queensland-based LPG Fire Australia's (2025a) focus on special hazard solutions, Fire Logbooks (2025) Australia's development of compliance tools. and WMIB's (2020) specialised risk management products for the industry) leads to more effective, reliable, and efficient fire safety solutions in Queensland This innovation is a direct productivity enabler.



- **Delivery of Advanced, Compliant Products and Systems:** Through this R&D, our partners provide the Queensland market with state-of-the-art fire safety installations meeting rigorous Australian and international standards.
- **Enhancement of Safety and Efficiency:** Innovative products often lead to tangible improvements in safety outcomes and installation/maintenance efficiency, boosting on-site productivity.
- **Knowledge Transfer and Upskilling:** Partnerships provide invaluable educational opportunities, including specialised technical training and support, crucial for bridging knowledge gaps when formal training lags.

The NFIA actively cultivates this knowledge exchange through flagship events such as our **National Technical Forum** and regional initiatives like the **North Queensland Technical Forum**. While this industry-driven educational model is invaluable, its full potential to enhance productivity can only be realised if formally recognised within structured Continuing Professional Development (CPD) programs and supported by agile qualification frameworks.

RECOMMENDATION 1

CPD and Industry Training: Formally recognise and integrate industry-led technical training, such as that provided through NFIA and its Premium Partners, into CPD frameworks and as pathways for competency validation, thereby enhancing productivity through timely knowledge transfer.

NAVIGATING THE REGULATORY MAZE: The Call for Clarity, Consistency, and Cohesion

The practice of fire protection in Queensland operates within a regulatory environment of considerable complexity, woven from national codes (National Construction Code - NCC), federal acts (e.g., the Fire Protection Industry Board (FPIB) scheme [FPIB, 2019a] and Australian Communications and Media Authority (ACMA) Cabling Provider Rules [ACMA, 2025]), state-specific legislation (principally the *Building Act 1975*, *Fire Safety Act 1990* and the QBCC Act), and Local Laws. As NFIA noted over two decades ago, such fragmentation is 'inefficient and extremely costly' [Productivity Commission, 2004 p. 2]. This persists as a significant impediment to productivity over two decades later.

A critical complexity is that buildings are certified to standards operative at their time of construction. Practitioners therefore require access to **historical versions of Australian Standards**, which is often difficult and costly. The NFIA firmly believes that **free and equitable access for practitioners to all**

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relevant **Australian Standards (current and historical)** is a fundamental prerequisite for a safe, compliant, and productive industry. The cost of these standards is a direct impediment.

RECOMMENDATION 2

Access to Standards: Implement a system for free and readily accessible Australian Standards, both current and historical, for all licensed fire protection practitioners to enhance compliance, safety, and productivity.

Cultivating a Skilled and Productive Workforce: Addressing Systemic Deficiencies in Licensing, Training, and Skills Recognition

The capacity of the Queensland fire protection industry to deliver safe and productive outcomes is fundamentally reliant upon a skilled, competent, and appropriately regulated workforce. Current frameworks, however, present significant economic and productivity drags.

- **Licensing – Complexity and Misalignment:** Queensland's framework of **12 fire protection licence types, segmented into approximately 40 classes** (Queensland Building and Construction Commission [QBCC], 2025a), while aiming for specificity, imposes substantial administrative burdens. Prescriptive prerequisite trade qualifications e.g., Prescriptive units of competency listed per class, many of which are superseded, Cert III Carpentry for some passive fire protection licences (QBCC, 2025b) often misalign with specialised fire protection skill sets, creating artificial entry barriers [NFIA Passive Fire Roundtable; 2025, May 7; Smith, J., 31:19-33:49; Rose, S., 57:56].

RECOMMENDATION 3

Licensing Reform: The success of any licensing framework is intrinsically link with industry's involvement and understanding of the framework. To ensure the ongoing success of Queensland's comprehensive licensing framework, appropriate consultation mechanisms are required allowing industry to directly inform licensing requirements and their associated competencies.

- **Training Frameworks – Delays and Relevance:** The transition to Jobs and Skills Councils (JSCs) like **Powering Skills Organisation** and **BuildSkills Australia** (Jobs and Skills Australia, 2025; Department of Employment and Workplace Relations, 2025, March 19) has unfortunately led to

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protracted delays in training package updates. Consequently, qualifications often lag industry practice. The NFIA Passive Fire Roundtable confirmed current formal passive fire qualifications are 'in no way reflective of industry' [NFIA Passive Fire Roundtable 2025, May 7, Smith, J., 0:03-0:17]. This forces businesses into costly supplementary training, reducing productivity.

RECOMMENDATION 4

Training Package Reform: Refine licensing frameworks in accordance with updated and emerging national training packages relevant to fire protection, ensuring direct and meaningful input from industry experts, including NFIA, to align qualifications with current technologies, practices, and genuine competency requirements.

- **Upskilling, Funding, and Regional Access:** Access to upskilling, especially for regional practitioners requiring travel to centralised RTOs like Fire Industry Training (FIT) at Beenleigh (Fire Industry Training, 2025), is costly and disruptive. Funding via bodies like Construction Skills Queensland (CSQ) needs to equitably support fire protection's specific training needs [NFIA, 2024c p. 2; NFIA 2004, p. 3; NFIA, 2023a].
- **Critical Bottlenecks – Nominee Supervisor Licensing and Skills Recognition:** Difficulties in obtaining or reinstating Nominee Supervisor licences create an artificial shortage of qualified supervisors. Similarly, the Australian and New Zealand Standard Classification of Occupations (ANZSCO) **fails to adequately recognise critical specialisations like "Passive Fire Protection Installer/Certifier,"** hindering targeted skilled migration despite persistent skills shortages evidenced in Occupational Shortage Lists (OSL) data [Australian Bureau of Statistics (ABS), 2024].

RECOMMENDATION 5

Nominee Supervisor and ANZSCO Reform: Reform QBCC Nominee Supervisor licensing to create practical pathways for experienced and competent individuals, including recognition of equivalent experience and recency of practice, and advocate for an urgent review of ANZSCO codes to accurately reflect fire protection specialisations.

- **Passive Fire Protection – Specific Needs:** The NFIA Passive Fire Roundtable underscored the fact that current qualifications are inadequate for passive fire. The prevalence of passive fire defects is alarming (Johnston & Reid, 2019; Johnston, 2022), often exacerbated by a lack of mandated

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baseline data like as-built compartmentation drawings often missing reported missing or non-existent.

RECOMMENDATION 6

Passive Fire Protection Pathways: Develop dedicated, industry-informed licensing pathways for passive fire protection practitioners, including robust trade tests and RPL, and mandate the provision of comprehensive baseline data, including compartmentation drawings, for all new buildings. Consultation with the Passive Fire Protection Industry is essential to ensuring the sustainability of the passive fire licensing stream.

- **CPD Framework:** A robust, nationally consistent CPD framework, aligned with Building Confidence Report (BCR) principles (Shergold & Weir, 2018), is essential. NFIA's industry-led educational initiatives should be recognised.

RECOMMENDATION 7

CPD Framework Establishment: Establish a mandatory, CPD framework for all licensed fire protection practitioners, with recognised contributions from industry-led training and technical updates.

The Queensland Building and Construction Commission (QBCC): Strengthening Regulatory Stewardship for a Productive and Safe Industry

The efficacy of Queensland's fire protection licensing regime hinges on robust QBCC enforcement and advisory functions.

- **Enforcement and Industry Sustainability:** Inconsistent or inadequate enforcement creates an **uneven playing field**, disadvantaging compliant NFIA members. The Boosted Fire/Boosted Services Group (Sharples, 2024; ASIC 2024) scenario raises concerns about accountability. This undermines licensing and increases risks.

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RECOMMENDATION 8:

QBCC Enforcement Enhancement: Significantly enhance QBCC's enforcement capacity and consistency for fire protection licensing, ensuring timely and transparent action against unlicensed or non-compliant work to maintain a level playing field and public safety.

- **Clarity and Consistency in Regulatory Advice:** NFIA members report difficulties obtaining clear, timely advice from QBCC, leaving businesses frustrated and vulnerable. This uncertainty is a direct drain on productivity.
- **Improving QBCC Functions:** Learning from bodies like the Australian Health Practitioner Regulation Agency (Ahpra), greater transparency in de-identified practitioner data could inform targeted education. A more proactive QBCC educational mandate (QBCC, 2025c), developed in genuine partnership with industry, would foster compliance and improve productivity.

RECOMMENDATION 9

QBCC Advisory and Education: Improve the clarity, consistency, and accessibility of QBCC advisory services, and leverage de-identified practitioner data to inform targeted industry education programs developed in collaboration with industry bodies like NFIA.

Meeting Future Demands: Workforce Capacity, Infrastructure Growth, and Automatic Mutual Recognition (AMR)

Queensland's ambitious infrastructure agenda demands a highly skilled fire protection workforce. Automatic Mutual Recognition (AMR) (Department of Employment and Workplace Relations, 2025) offers potential but requires vigilance to ensure it facilitates mobility of genuinely competent practitioners without lowering Queensland's high safety standards.

RECOMMENDATION 10

Automatic Mutual Recognition (AMR) Strategy: Proactively engage with the AMR framework to ensure that while facilitating skilled workforce mobility for major projects, Queensland's high standards for fire safety practitioner competency are maintained, potentially through advocating for national minimum benchmarks or supplementary competency assessments for specific high-risk licence classes.

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Commercial Realities and Ethical Imperatives: Addressing Power Imbalances and Unfair Practices

The maldistribution of power between head contractors (typically the principal building company, or ‘builder’, responsible for overall project delivery) and subcontractors (e.g., NFIA Members) remains a critical issue. This imbalance leads to unfair contract terms and chronic security of payment problems [NFIA 2021; 2023b; 2024b], impacting productivity and increasing insolvency risk. This environment can inadvertently foster unethical practices like illegal phoenix activity (e.g., Boosted Fire). Thematic insights suggest how certain broad industrial conditions can further exacerbate these pressures on subcontractors, impacting site productivity through issues such as inflexible work arrangements and dispute resolution challenges.

RECOMMENDATION 11

Commercial Fairness: Strengthen and rigorously enforce security of payment legislation and implement measures to address unfair contract terms and the systemic power imbalance in the construction contractual chain.

The True Value of Safety: Beyond Minimum Standards to Community Expectations

Fire protection is too often treated as a ‘grudge purchase’, leading to its undervaluation. This allows non-compliant operators to undercut reputable NFIA members who strive for **community standards of safety**, which often exceed NCC minimums. As NFIA argued in 2004, ‘minimum acceptable’ should not equate to ‘community expectation’ [Productivity Commission, 2004 p. 2]. Investing in robust fire safety enhances long-term resilience and reduces lifecycle costs (Johnston & Reid, 2019; Johnston, 2022). True productivity must encompass the delivery of enduringly safe infrastructure meeting community expectations.

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Recommendation 12

Value of Safety in Procurement: Promote procurement models for public and private projects that value demonstrated competency, compliance with community safety standards, and lifecycle performance of fire safety installations, rather than focusing solely on lowest upfront cost.

A Call for Cohesion: Forging a Collaborative, Consistent, and Productive Future

The challenges articulated mirror many of those NFIA raised in its 2004 Productivity Commission submission over two decades ago. A cohesive national strategy, robust state-level implementation, and genuine industry collaboration are essential. This includes early engagement of qualified fire protection designers, formalised partnerships (e.g., NFIA-CSQ, NFIA-QFD), and industry-led trade tests for competency. The impact of natural events in Queensland also requires consideration in contractual frameworks to avoid disproportionate risk being pushed onto subcontractors, further straining their productivity and viability.

RECOMMENDATION 13

Regional Support: Implement targeted measures to address the specific challenges faced by regional and rural fire protection practitioners, including improving access to training, flexible licensing solutions for ancillary tasks, and support for accessing specialised certification services.

RECOMMENDATION 14

Regulatory Harmonisation: Actively pursue greater harmonisation and reduce conflicts between local, state, and federal regulatory requirements impacting fire safety installations to minimise administrative burden and enhance productivity.

RECOMMENDATION 15

Collaborative Partnerships: Foster and formalise collaborative partnerships between NFIA, government agencies (e.g., QBCC, QFD), and training bodies (CSQ, RTOs) to develop and implement practical solutions for workforce development, standards interpretation, and industry best practice.

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Conclusion: Towards a Safer, More Productive Queensland

The National Fire Industry Association and its members are steadfast in their commitment to protecting the Queensland community through the delivery of high-quality, compliant fire safety installations. The fire protection industry is an essential service, a critical enabler of public safety, and a vital contributor to the economic productivity of the State. However, its capacity to perform this role to its fullest potential is currently constrained by a range of systemic issues that demand considered and collaborative reform.

The echoes of NFIA's 2004 submission to the Productivity Commission are undeniable; many of the fundamental challenges to efficiency and effectiveness persist. The call then, as now, is for 'amendment to the current regulatory regime which provides a more efficient and effective Building Regulation environment which will benefit all of industry and the Australian consumer' [NFIA 2004, p. 5; 2019; 2024a].

The NFIA believes that meaningful productivity gains are wholly compatible with, and indeed contingent upon, the highest standards of fire safety and practitioner competency. We urge the QPC to recommend a bold and collaborative reform agenda. This agenda must prioritise the intelligent refinement of licensing systems, the modernisation and industry-alignment of training pathways, equitable access to essential technical information, robust and fair enforcement, and the fostering of a more balanced and sustainable commercial environment.

The NFIA stands ready to collaborate further, offering our extensive industry knowledge and the collective expertise of our members to be part of the solution, ensuring that Queensland's built environment is protected by the highest standards of fire safety, delivered by a productive, professional, and proficient workforce.

We welcome the opportunity to meet with the QPC to discuss and detail NFIA's submission and look forward to meaningfully engaging with the QPC for the betterment of Queensland's Construction Industry. Please contact NFIA's Policy and Government Relations Manager Jasmine Bulman [REDACTED] to arrange a time convenient to you and your team.

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Summary of Key Recommendations

1. **CPD and Industry Training:** Formally recognise and integrate industry-led technical training, such as that provided through NFIA and its Premium Partners, into CPD frameworks and as pathways for competency validation, thereby enhancing productivity through timely knowledge transfer.
2. **Access to Standards:** Implement a system for free and readily accessible Australian Standards, both current and historical, for all licensed fire protection practitioners to enhance compliance, safety, and productivity.
3. **Licensing Reform:** The success of any licensing framework is intrinsically link with industry's involvement and understanding of the framework. To ensure the ongoing success of Queensland's comprehensive licensing framework, appropriate consultation mechanisms are required allowing industry to directly inform licensing requirements and their associated competencies.
4. **Training Package Reform:** Refine licensing frameworks in accordance with updated and emerging national training packages relevant to fire protection, ensuring direct and meaningful input from industry experts, including NFIA, to align qualifications with current technologies, practices, and genuine competency requirements.
5. **Nominee Supervisor and ANZSCO Reform:** Reform QBCC Nominee Supervisor licensing to create practical pathways for experienced and competent individuals, including recognition of equivalent experience and recency of practice, and advocate for an urgent review of ANZSCO codes to accurately reflect fire protection specialisations.
6. **Passive Fire Protection Pathways:** Develop dedicated, industry-informed licensing pathways for passive fire protection practitioners, including robust trade tests and RPL, and mandate the provision of comprehensive baseline data, including compartmentation drawings, for all new buildings. Consultation with the Passive Fire Protection Industry is essential to ensuring the sustainability of the passive fire licensing stream.
7. **CPD Framework Establishment:** Establish a mandatory, CPD framework for all licensed fire protection practitioners, with recognised contributions from industry-led training and technical updates.
8. **QBCC Enforcement Enhancement:** Significantly enhance QBCC's enforcement capacity and consistency for fire protection licensing, ensuring timely and transparent action against unlicensed or non-compliant work to maintain a level playing field and public safety.

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9. **QBCC Advisory and Education:** Improve the clarity, consistency, and accessibility of QBCC advisory services, and leverage de-identified practitioner data to inform targeted industry education programs developed in collaboration with industry bodies like NFIA.
10. **Automatic Mutual Recognition (AMR) Strategy:** Proactively engage with the AMR framework to ensure that while facilitating skilled workforce mobility for major projects, Queensland's high standards for fire safety practitioner competency are maintained, potentially through advocating for national minimum benchmarks or supplementary competency assessments for specific high-risk licence classes.
11. **Commercial Fairness:** Strengthen and rigorously enforce security of payment legislation and implement measures to address unfair contract terms and the systemic power imbalance in the construction contractual chain.
12. **Value of Safety in Procurement:** Promote procurement models for public and private projects that value demonstrated competency, compliance with community safety standards, and lifecycle performance of fire safety installations, rather than focusing solely on lowest upfront cost.
13. **Regional Support:** Implement targeted measures to address the specific challenges faced by regional and rural fire protection practitioners, including improving access to training, flexible licensing solutions for ancillary tasks, and support for accessing specialised certification services.
14. **Regulatory Harmonisation:** Actively pursue greater harmonisation and reduce conflicts between local, state, and federal regulatory requirements impacting fire safety installations to minimise administrative burden and enhance productivity.
15. **Collaborative Partnerships:** Foster and formalise collaborative partnerships between NFIA, government agencies (e.g., QBCC, QFD), and training bodies (CSQ, RTOs) to develop and implement practical solutions for workforce development, standards interpretation, and industry best practice.

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Appendix A: De-identified Case Study – Legislative Mismatch Impacting Safety and Productivity

A significant challenge to productivity and the timely delivery of essential fire safety installations arises when local government planning scheme requirements are not adequately harmonised with state and national building codes. A notable example involves a local government in Queensland whose planning scheme introduced a broad requirement for an **Environmental Impact Assessment Report** for certain classes of development.

While the intent of such a requirement – to safeguard environmental quality – is laudable, its application inadvertently and problematically extended to aspects of fire safety system installations deeming in some cases these installations non-compliant. Specifically, the installation of emergency power generation systems, treatment systems and certain types of mechanical exhaust associated with smoke management systems became subject to these detailed environmental impact assessments.

Safety Implications:

The primary concern arising from this situation was not the principle of environmental assessment itself, but the **significant delays it imposed on the approval and commissioning of critical life-safety systems** and the subsequent impact **development approval conditions had on meeting the minimum standards prescribed under the NCC** resulting in significant deviation for industry norms and minimum requirements mandated at state and commonwealth levels. Fire protection engineers and contractors found themselves navigating an additional, often complex and time-consuming, approval pathway that was not directly related to the fire safety performance objectives mandated by the National Construction Code (NCC). Delays in obtaining these environmental approvals could, in turn, delay the certification and handover of buildings, potentially leaving them without fully operational essential fire safety measures for extended periods or in a state of non-compliance with building safety legislation. This created a perverse outcome where a measure intended for one aspect of public good inadvertently compromised another – the timely provision of life safety. Additionally the local planning scheme's unintended consequences resulted in either a delay or a significant increased risk in catastrophic failure in implementing the conditions in full.

Productivity Issues:

The imposition of these broad environmental assessment requirements on specialised fire safety installations led to several direct and indirect productivity losses:

- **Increased Project Costs:** The necessity to engage specialist environmental consultants to prepare these impact assessment reports added substantial, often unbudgeted, costs to fire

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protection system projects. These costs were ultimately passed on to building owners and developers, contributing to overall construction cost inflation.

- **Significant Project Delays:** The timeframe required to scope, prepare, submit, and obtain approval for these environmental reports frequently extended project timelines for the fire protection components by weeks or even months. This had a cascading effect on overall project schedules and completion dates.
- **Misallocation of Specialist Resources:** Fire protection professionals, whose expertise lies in the design and implementation of life safety systems, were required to expend considerable time and effort managing and coordinating an approval process outside their core competencies. This diverted valuable resources from their primary tasks. In addition to this the installation of non-certified treatment systems resulted in significant fire safety concerns still currently unresolved.
- **Regulatory Uncertainty and Inconsistency:** The triggers for, and the specific requirements of, these environmental assessments as applied to fire safety installations were not always clear or consistently interpreted by the local government. This created uncertainty for designers and contractors, making project planning and risk management more difficult.

This de-identified case study illustrates a critical systemic issue: the potential for well-intentioned but poorly integrated regulatory requirements at different levels of government to create unintended negative consequences. It underscores the imperative for:

- **Improved Inter-Governmental Regulatory Coordination:** Ensuring that local planning scheme provisions are developed and applied in a manner that is cognisant of, and harmonised with, state and national building codes, particularly concerning essential life safety systems.
- **Clear Delineation of Regulatory Authority:** Avoiding duplication or conflict between planning controls and building controls where the NCC already provides comprehensive performance requirements for fire safety installations.
- **Risk-Based and Proportionate Application of Ancillary Assessments:** Ensuring that additional assessment requirements (such as broad environmental impact studies) are genuinely warranted and proportionate to the actual risks posed by specific fire safety system components, especially those that operate infrequently or are already subject to stringent design and emission standards.

The NFIA would be pleased to provide, in confidence, further specific details of such instances to the Productivity Commission to assist in understanding the tangible impacts of such regulatory mismatches on industry productivity and project delivery in Queensland. Addressing these points of friction is crucial for creating a more efficient and effective regulatory environment that supports both public safety and economic productivity.

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