A Publication authored by The PPW Group

in

Response

to

Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

(This publication submitted by Email Transmission 3 July 2025)

(Response File Reference: PPW – TOR – Otipotcs)

[redacted]

Response Contents

PREFACE
AND
REDACTION AUTHORISATION

We offer a sincere thank you for this valued invitation to respond to this opportunity to improve productivity of the construction sector.

The PPW Group (PPW) became aware of this Queensland Productivity Commission – Opportunities to improve productivity of the Construction Sector during our business week ending Friday 30 May 2025. Due to the National importance of this opportunity PPW has made a significant invest in producing our response within this limited time frame.

Our response relates to the National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety Systems – building work component of Building Construction.

PPW understand the commencement of COMPLIANT Building Construction is a COMPLIANT ***Appropriate Authority****1 recognised ***Appropriately Qualified Person****2 Design Certifier ***Approved Design****3.

*1 Refer to the complimentary extract of the PPW (QUEENSLAND) DICTIONAY for a legislative meaning of ***Appropriate Authority****1 that has had the Controlled Document – Publication Rights Protection conditions withdrawn for the purpose of our response.

*2 Refer to the complimentary extract of the PPW (QUEENSLAND) DICTIONAY for a legislative meaning of ***Appropriately Qualified Person****9 that has had the Controlled Document – Publication Rights Protection conditions withdrawn for the purpose of our response.

*3 Refer to the Queensland Building Assessment Provisions – QDC – MP6.1 – Referenced Document Australian Standard AS1851 – 2012 Sections 1.5.3 and 1.5.4 for a legislative meaning of ***Approved Design****3.

To improve Building Construction Productivity, PPW understand that all three levels of Government; Federal, State/Territory and Local Governments MUST have access to an ***Appropriate Authority****1 (Building Certifier) recognised ***Appropriately Qualified Person****2 Design Certifier in order to understand current NON – COMPLIANCE **Fire Safety Concerns.**

There are as many unanswered questions as there are NON – COMPLIANCE **Fire Safety Concerns.**

These types of questions have been ignored when highlighted in our library of previous submissions of this kind.

We look forward to the possibility of receiving answers to these questions from the Queensland Government.

SOME of these unanswered **Q**uestion (**Q**) form the basis of our response which are summarised below.

Q1) Is a Queensland Building and Construction Commission (QBaCC) licensed ***Appropriate Authority****1 (Building Certifier) qualified to recognise a Queensland National Construction Code (Building Code of Australia) – Volume 1 – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier is appropriately qualified in compliance with the COMPLEX Queensland Regulatory Framework?

If the answer to **Q1)** is yes, then a resultant question is **Q2)** –

Q2) Are there QBaCC licensed ***Appropriate Authority****1 (Building Certifiers) who have recognised a Queensland National Construction Code (Building Code of Australia) – Volume 1 – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier is appropriately qualified?

If the answer to **Q2)** is yes, then a resultant question is **Q3)** –

If the answer to **Q2)** is NO, then a resultant question is **Q4)** –

Preamble to Q3)

It is understood that the ONLY Queensland National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety Systems – ***Appropriately Qualified Person****2 Design Certifier qualification is the Queensland Logan TAFE CN941 Diploma and the Award Elements (Academic Competency Recognitions) M00 EB141 and M00 EB142.

Q3) Do the QBaCC licensed ***Appropriate Authority****1 (Building Certifiers) who have recognised a Queensland National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier as being appropriately qualified understand that the Queensland Logan TAFE CN941 Diploma and the Award Elements (Academic Competency Recognitions) M00 EB141 and M00 EB142 are the ONLY academic qualifications for recognising the competency of National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety Systems – ***Appropriately Qualified Person****2 Design Certifier?

Refer to Page 10 for the Australian Building Codes Board (ABCB) identified Registered Fire Systems Technical Designer **Qualification**.

Please note the ABCB "**APPLICATION**" recommendation at the bottom of Page 10.

Preamble to Q4)

It is expected that if the if the answer to **Q2)** is NO then the Queensland Government and the People of Queensland should consider this to be a **SERIOUS FIRE SAFETY CONCERN** that should be addressed in order to improve productivity within the Building Construction Industry.

Q4) Does Queensland Government consider a NO answer to **Q2)** to be a **SERIOUS FIRE SAFETY CONCERN** that should be addressed in order to improve productivity within the Building Construction Industry.

REDACTION AUTHORISATION

We understand that our response is within the TERMS OF REFERENCE (TOR).

Some of the TOR are dot points 4, 5, 6 and 11.

PPW have added the dot point references in order to assist with clarity of our response.

We iterate our above input that reads; **To improve Building Construction Productivity, PPW understand that all three levels of Government; Federal, State/Territory and Local Governments MUST have access to an *Appropriate Authority**1 (Building Certifier) recognised *Appropriately Qualified Person**2 Design Certifier in order to understand current NON – COMPLIANCE Fire Safety Concerns.**

However, given that our response will be posted publicly, if any aspect of our response is considered to be unsuitable for public posting then we provide this "Redaction Authorisation".

QUEENSLAND PRODUCTIVITY COMMISSION ACT 2025

Section 38

DIRECTION

Direction

Under sections 9(1)(a) and 38 of the Queensland Productivity Commission Act 2025, I direct the Commission to undertake an inquiry and provide a report in accordance with the Terms of Reference set out below.

TERMS OF REFERENCE

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

1. Context

An efficient construction sector plays a key role in a competitive and productive economy. The Queensland sector contributed $37.6 billion to total economic output and employed 279,00 people in 2023-24.

The construction sector is broad – it includes residential and commercial buildings, civil engineering and construction services. The productivity of the sector has a large impact on the state's housing market and housing and affordability, the competitiveness of industries using construction inputs and the delivery and cost of important public infrastructure including transport, energy, education and health facilities.

Construction productivity growth over the last three decades has been weak compared to the boarder economy in both Queensland and across Australia. Following the COVID-19 pandemic, the industry has been under substantial pressure, with surging construction input prices, rising insolvencies, and constraints on the supply of labour and materials. At the same time, the ongoing housing shortage and large Queensland Government capital program (including the delivery of Brisbane 2023 Olympics infrastructure) mean lifting construction productivity to deliver increased market capacity is more important than ever.

To ensure the construction sector can meet Queensland's infrastructure and housing needs, the inquiry will examine policy and regulatory factors that are affecting the productivity of the construction sector in Queensland.

The Crisafully Government has a stated aim of delivering one million new dwellings across Queensland by 2044 (approx.. 50,000 per year). Recent annual completions have been below 35,000 dwellings per annum which is in line with completion levels in 1980s when population was half of today's levels. To meet this target the sector will need to improve its level of productivity.

Further, vacancy rates across the state for rental properties sit around 1 per cent across the major centres. It is imperative that Queensland has the correct regulatory environment and policy settings in place to support productivity and address housing supply and affordability issues and support delivery of public infrastructure projects.

C2. The Inquiry

The Queensland Productivity Commission (QPC) is directed to undertake an inquiry reviewing the factors driving productivity in the Queensland construction sector and make recommendations for reform to improve productivity without compromising quality and safety outcomes.

Without directing the QPC as to the contents of its advice or recommendations in the report, I direct the QPC to investigate and report on:

- **1** Current conditions in the housing market, residential development sector, infrastructure delivery and construction sector in Queensland, including in both housing and non-residential construction as they relate to the delivery of additional housing supply and housing affordability
- **2** key trends in the sector including input costs, prices, competition, supply chain developments, productivity, and relevant comparisons with other jurisdictions and, where possible, across Queensland regions
- **3** productivity on residential, commercial and infrastructure construction sites, across a range of typologies and locations, relative to productivity performance in other States

- **4** factors shaping Queensland's productivity performance including commonwealth, state and local government legislation and regulation, industrial relations matters, procurement policies and labour force needs (individually, cumulative or through duplication) and opportunities for improvement
- **5** the opportunities for improvement in productivity in Queensland including regulatory and non-regulatory mechanisms
- **6** priority areas for reform for the Queensland Government to efficiently address identified challenges in the short, medium and long term (including but not limited to labour availability, skills availability and market competition, the availability of suitably qualified head contractors and sub contractors etc)
- **7** key recommendations and themes from other relevant productivity reviews, including those undertaken by the Australian Government Productivity Commission
- **8** impact on small and medium scale subcontractors in regional areas to compete for government tenders due to regulatory requirements
- **9** flow on effect across the industry of government regulations to compete for labour and resources on both wages and work conditions
- **10** factors that limit the availability of suitable labour for building and civil construction, skills development of the labour force, and matching of labour supply with sector demand, and how policy settings can be improved
- **11** how government procurement and contracting arrangements, including Best Practice Industry Conditions, affect productivity in the construction sector, and how practices and policy settings can be improved
- **12** barriers to entry, investment and innovation in the sector, and potential options to address those impediments
- **13** key issues to be considered in implementing reform options identified and views on how recommendations could be prioritised.

In considering policy responses, the inquiry should focus on the key systemic policy and regulatory settings that impact construction sector productivity. Similarly, the inquiry should primarily focus on those areas that can be influenced by the Queensland Government. However, where there are critical issues that fall within the scope of local government or Australian Government policy, the inquiry should identify such issues and provide options to inform the Queensland Government's engagement on these matters.

3 Conclusion

Under section 38(2)(c) I direct the QPC to undertake wide public consultation with stakeholders, including with the general public, industry peak bodies, unions, construction businesses, sub-contractors and consultants, professionals and their associations, customer, business and community advocates, the finance and insurance sectors and regulatory bodies and Queensland Government agencies.

Participants will be granted the option to submit to the enquiry on a confidential basis in writing.

5 Reporting

The QPC must deliver a report within 6 months of the date of this direction.
For the report, the QPC should consult widely and may issue interim or draft reports for stakeholder feedback to ensure all evidence and views are included in the final report.

HON. DAVID JANETZKI MP
Treasurer
Minister for Energy
Minister for Home Ownership
24 / 4 / 2025

(QUEENSLAND)
DICTIONARY
of
AS(/NZS)1668 Mechanical Ventilation
Queensland Codes and Regulations
Terms and Words – Legislative Meanings

[With Queensland Legislative Reference Date*1 (*1 QLRD:)]

(Revision 2: 31.03.25)

DRAFT

Page i Publication Rights Protection conditions WITHDRAWN

PREFACE

This AS1668 Air Handling Systems Designs – (QUEENSLAND) DICTIONARY of AS1668 Mechanical Ventilation Terms and Words – Legislative Meanings [With Queensland Legislative Reference Date*1 (*1 QLRD:)]: Revision 2: 31.03.25 has been Authored by The PPW Group – Registered Fire Systems Technical Designer – Engineering Manager Wayne Palmer.

Please refer to Pages 7 to 10 for a brief Introduction to The PPW Group – Registered Fire Systems Technical Designer – Engineering Manager Wayne Palmer.

AS1668 Air Handling Systems Designs is a recently established AS1668 Air Handling Systems Consulting Engineering Service of The PPW Group.

This (QUEENSLAND) DICTIONARY contains some AS1668 Mechanical Ventilation Terms and Words – Legislative Meanings that are common to NATIONAL AS1668 Mechanical Ventilation Terms and Words – Legislative Meanings.

This Dictionary is NOT to be read in CONJUNCTION with other AS1668 Air Handling Systems Designs State and Territory DICTIONARY publications.

The user of this (QUEENSLAND) DICTIONARY is required to engage the assistance of a Queensland Building and Construction Commission licensed Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriate Authority (Building Certifier) who is licensed to recognise and competent person decide/register (/record) a Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriately Qualified Person – Design Certifier who is an Australian Building Codes Board identified Registered Fire Systems Designer (refer Page 10) in order for the user to understand the contents of this publication.

This publication is a **PPW Controlled Publication** which is issued STRICTLY IN ACCORDANCE with the below **Publication Rights Protection** conditions.

Below Publication Rights Protection conditions WITHDRAWN

About the Author

Introduction to The PPW Group
Registered Fire Systems Technical Designer

Wayne Palmer

1 Our Engineering Manager – Registered Fire Systems Technical Designer

1-A Our Engineer's Qualifications

After years of research into the availability of a qualification that would recognise Wayne's experience, knowledge and skills it became apparent that there was only one (1) academic* competency recognition pathway available for an [AS(/NZS)1668 Air Handling Systems] – Prescriptive Standards Engineer to have their experience, knowledge and skills competency assessed and recognised.

* academic means competency recognition by a College, University or other Registered Training Organisation.

The recognition pathway was to have the experience, knowledge and skills academically competency assessed against the **CN941 Diploma of Engineering** program and in particular, the below two (2) Award Elements –

i) Award Element **M00 EB141** Air Conditioning [AS(/NZS)1668 Air Handling Systems] Codes and Regulations.

ii) Award Element **M00 EB142** Exhaust Systems [AS(/NZS)1668 Air Handling Systems] Design.

Wayne's qualification is Nationally recognised within the Australian Qualifications Framework.

Wayne has been competent person assessed under the complex Queensland Regulatory Framework as being a **Queensland Building Code of Australia 1996 (QBCoA1996) – Volume 1 (V1) – Clause A2.2 – [AS(/NZS)1668 – Mechanical Ventilation – Air Handling Systems – Fire Safety Systems – Other Appropriately Qualified Person**.

1-B The Author's Experience

A brief overview of Wayne's sixty (60) years of experience –

i) **During 1965** Wayne joined the family business to become a fifth-generation member of the family business.

Foot Note!

FN1 A brief overview of the family business history is available at https://ppwgroup.com.au *click on "The Palmer Family History" section of the left hand side menu.*

Wayne completed a five (5) year apprenticeship as a Sheet Metal Worker specialising in the manufacture of what have become to be known today as [AS(/NZS)1668 Air Handling Systems].

Foot Note!

FN2 The first AS1668 standards were published around 1974 for Part 1 and around 1976 for Part 2.

ii) **From 1965 through to the early 70's** concurrently with Wayne's Sheet Metal Worker apprenticeship Wayne became experienced regarding the installation and project management of [AS(/NZS)1668 Air Handling Systems].

iii) **During the early 70's through to the late 90's** Wayne assumed the position of [AS(/NZS)1668 Air Handling Systems] Engineering Manager and established an in house drafting and engineering office section of the family business.

Some of the [AS(/NZS)1668 Air Handling System] Component Products that were developed during this period were fire rated – fans, ductwork, flexible ductwork to fan connections, enclosures and ventilators.

iv) **From the late 80's through to the late 90's** as Australia drew towards National Legislative Regulation of [AS(/NZS)1668 Air Handling Systems] it became necessary for Wayne to gain experience regarding the Commission, Inspection and Service of [AS(/NZS)1668 Air Handling Systems].

1-B The Author's Experience *(Continued)*

v) **From the late 90's through to the early 2000's** with the introduction of the legislative requirement to be an Appropriately Qualified Person by way of the Building Code of Australia it became necessary for Wayne to become an [AS(/NZS)1668 Air Handling System] – Appropriately Qualified Person to continue his professional career.

vi) **The early 2000's through to 2006** became the most frustrating period of Wayne's professional career. It took Wayne six (6) years to establish that there was only one (1) academic qualification that would academically recognise him as being competent to understand [AS(/NZS)1668 Air Handling Systems] Design Codes and Regulations.

During 2006 Wayne was academically recognised by Queensland's Logan TAFE College CN941 Diploma Program as being appropriately qualified to competently understand [AS(/NZS)1668 Air Handling Systems] Design Codes and Regulations.

Wayne's academic competency recognition is NATIONALLY recognised within the Australian Qualifications Framework.

vii) **From 2006 through to 2015** Wayne started on a journey of interacting with Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Stakeholders in an endeavour to establish a mutual understanding of the Queensland Legislative Regulatory Framework. Wayne's Father had taught him to *firstly establish what the rules are and then to ensure that Wayne played by the rules*!

Wayne spent nine (9) years interacting with most levels of stakeholders and researching [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Legislative Regulatory Frameworks.

Wayne needed to firstly establish what the rules were to ensure that he was able to play by the rules. After nine (9) years of research into the Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Legislative Regulatory Framework and associated Legislation, it became apparent that significant ***Fire Safety Non-Compliance Concerns*** needed to be addressed.

viii) **From 2015 through to 2018** Wayne started three (3) years of research focused on the Tender Stage of Queensland Developments that incorporate Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Kitchen Hood Local Exhaust Ventilation] – Fire Safety Systems.

PPW now have a library of Tender Documents that reveal ***Fire Safety Non-Compliance Concerns*** exist at all stakeholder levels in Queensland.

ix) **From 2018 through to present** Wayne has focused on achieving three (3) **P**rimary **O**bjective –

PO1 To develop a National Dictionary of National Construction Code – Volume 1 – [AS(/NZS)1668 Air Handling Systems] – State and Territory – Legislative Regulatory Framework Terms, in response to the Shergold Weir Report. This is proving to be an ambitious task.

PO2 To commence engagement with the seventy seven (77) Queensland Local Governments to establish a mutual understanding of the meaning of the Queensland Building Assessment Provisions Codes term "National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Compliant Approved Design".

Some initial feed back from Queensland Local Government regarding the regulation of "National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Compliant Approved Design" for Queensland Government Buildings has been that it is NOT FINANCIALLY VIABLE due to Queensland Building Act 1975 Section 2(2).

Queensland Building Act 1975: 2 October 2022 Section 2 is reproduced below.

2 Act binds all persons

(1) This Act binds all persons, including the State, and, as far as the legislative power of the Parliament permits, the Commonwealth and the other States.

(2) **NOTHING IN THIS ACT MAKES THE STATE LIABLE TO BE PROSECUTED FOR AN OFFENCE.**

1-B The Author's Experience *(Continued)*

PO3 To commence engagement with the States and Territories outside of Queensland in order to gain National awareness of the National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Appropriately Qualified Person Qualifications.

1-C The Author's knowledge

Wayne has been a member of the Standards Australia Technical Sub Committee ME062 – 02 (AS1668:2) since 2009.

Foot Notes!

FN3 PPW AS1668 Air Handling Systems Designs has engaged with Standards Australia to ***clarify why Wayne's Standards Australia Technical Sub Committee ME062 – 02 (AS1668:2) Membership was terminated*** *which is ongoing as part of a formal complaint as at the time of this QUEENSLAND DICTIONARY Revision 2: 31.03.25.*

FN4 Part of the PPW AS1668 Air Handling Systems Designs ongoing formal complaint includes, however, is not limited to, clarification of Standards Australia publication titled Nominating Organisation Guide – Rules and responsibilities and their representatives – Version: 2.0 Revision 22/10/2019 and Version: 2.1 Revision 15/11/2021, ***relevant to their approval of DR AS1668.2.2023****, that in part reads; Page 8* ***Section 1.3 Roles and responsibilities*** *| It is expected that a Nominating Organisation will | regarding "Selection of your representatives" | Have a transparent documentation process for appointing representatives to Standards Australia's (SA) Technical Committee(s) | Ensure your representatives are* ***appropriately qualified****, knowledgeable and empowered to effectively contribute to the work of the committee.*

The ABCB BCR (Building Confidence Report) Implementation Team wrote on 19th August 2020: ***as such we HAVEN'T PRESCRIBED AS1668 AIR HANDLING SYSTEMS as this is very specific to the mechanical and fire systems installation disciplines and part of STANDARDS AUSTRALIA KNOWLEDGE IN DESIGNING SYSTEMS.***

The Author posed the below **R**equest **f**or **A**ssistance **1** (**RfA1**) to Standards Australia to obtain their position regarding the above ABCB BCR (Building Confidence Report) Implementation Team statement.

RfA1 Could we please ask for your assistance to clarify if Standards Australia supports the above ABCB BCR (Building Confidence Report) Implementation Team statement ?

The Standards Australia response to the Authors's **RfA1** was –

THE IMPLEMENTATION OF THE BCR IS A MATTER FOR THE ABCB AND NOT US.
WE DON'T HAVE VIEWS ON IT AND YOU SHOULD DIRECT YOUR CORRESPONDENCE TO THE ABCB.

1-D The Author's skills

Wayne is an ***appropriately qualified*** prescriptive standard designer, certifier, manufacturer, installer, commissioner, inspector, service technician, annual report certifier and compliance documentation guidance provider of [AS(/NZS)1668 Air Handling Systems] and associated prescriptive standards.

1-E Registered Fire Systems Technical Designer

The Building Ministers' Forum (BMF), now the Building Ministers Meeting (BMM), authorised an assessment of the effectiveness of compliance and enforcement systems for the building and construction industry accross Australia.

The resulting Shergold and Weir Building Confidence Report 22 February 2018 (BCR 22.02.2018.) **highlighted shortcomings in the implementation of the National Construction Code** and made twenty four (24) recommendations to address these issues.

The BCR highlights the need for action in the building industry, including the need for a more effective building practitioner registration scheme.

The Australian Building Codes Board (ABCB) published the "National Registration Framework for Building Practitioners – Discussion paper – 2020 Version 1.0 dated 26th June 2020".

This discussion paper identified the "Registered Fire SystemsTechnical Designer"information on Page 10.

The "Registered Fire Systems Technical Designer " information on Page 10 has been reinforced by the ABCB publication "National Registration Framework for building practitioners - Model guidance on BCR recommendations 1 and 2 – 2021 v1.0 dated 10/12/2021".

The PPW Group Engineering Manager Wayne Palmer is a QNCC V1 ***Appropriate Authority*** recognised AS(/NZS)1668 Air Handling Systems – Mechanical Ventilation ***Appropriately Qualified Person*** Design Certifier who has been ***Competent Person*** decided and recorded (registered) under the complex Queensland Regulatory Framework.

Registered Fire Systems Technical Designer

(National Registration Framework for Building Practitioners – Discussion Paper – 2020)

(Publish date: 26 June 2020 – Print version: 1.0)

Fire Systems Design – Page 91

Registration Category	**Design Profession**
Discipline	Fire Safety Design
Occupations Covered	Fire Systems Engineer
	Fire Systems Designer

Definitions

Registered fire systems technical designer is an individual registered at level 2 in the discipline of fire systems design. Sub-disciplines are:

- **Registered fire systems technical – fire and smoke control designer** is an individual registered at level 2 in the sub-discipline of fire systems design – fire and smoke control.

Fire systems design work means engineering work that required, or is based on, the application of engineering principles and data to a design relating to fire systems engineering for a building that is done **ONLY in accordance with a prescriptive standard**.

Engineering work includes **design, checking, peer review and signing certificates of compliance**.

Registration Levels – Page 92

Level	**Type**	**Qualifications**	**Experience**
2	Technical (restricted) – fire and smoke control systems	AQF5	3 years

Registered Technical Designers – Page 17

Specialist technical work may be done ……by *registered technical designers* who have trade level or diploma qualifications as well as experience in the relevant area of building engineering.

The registered technical designers covered by the NRF are:

- Registered fire systems designer level 2 Fire systems design work

An appropriately registered technical designer is permitted to design and document technical specialist work using engineering principles and data **ONLY in accordance with a prescriptive standard**. Technical specialist work using **prescriptive standards** is restricted to ……registered technical designers in the appropriate discipline.

Fire systems designers ……level 2 should be registered or licensed under existing or new fire services systems installer licensing*1 legislation.

*1 In Queensland registration of a ***Registered Fire Systems Technical Designer*** is the legislative responsibility of a Queensland Licensed Building Certifier.

Table 1 NRF taxonomy – Page 26

*1 Building Production

Field	**Category**	**Discipline**	**Level**	**Endorsement**	**Definitions**	**Permitted Work**	**Qualification**	**Experience**
*1	Design	**Fire Systems Design – fire and smoke systems**	2			Fire systems design work for fire and smoke control systems for building complexity levels 0-2 DTS only	Approved **diploma** of fire services design that includes the relevant units applicable to this category of work, with **approved NCC training. CN941 Diploma + M00 EB141 + M00 EB142.**	3 yrs

NRF for Fire Safety and Fire Systems Design – Page 85

Application

The NRF sets out the core requirements for nationally consistent registration of …. Fire systems ……technical designers.

To implement the NRF, each state and territory **must** use existing or enact new legislation to provide for registration of ……fire systems technical designers at level 2, and to prohibit the carrying out of ……fire systems ……technical design work by individuals who are not registered.

Revision 1: 06.12.23.

This framework applies to individuals.

(QUEENSLAND) DICTIONARY
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INTRODUCTION TO THIS (QUEENSLAND) DICTIONARY – INDEX

The user of this (QUEENSLAND) DICTIONARY is required to engage the assistance of a Queensland Building and Construction Commission licensed Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriate Authority (Building Certifier) who is licensed to recognise and competent person decide/register (/record) a Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriately Qualified Person – Design Certifier who is an Australian Building Codes Board identified Registered Fire Systems Designer (refer Page 10) in order for the user to understand the contents of this publication.

(QUEENSLAND) DICTIONARY
APPENDIX A
Queensland Legislative Reference Date*1 (*1QLRD)
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INTRODUCTION TO THIS (QUEENSLAND) DICTIONARY – APPENDIX A – INDEX

The user of this (QUEENSLAND) DICTIONARY is required to engage the assistance of a Queensland Building and Construction Commission licensed Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriate Authority (Building Certifier) who is licensed to recognise and competent person decide/register (/record) a Queensland National Construction Code – Volume 1 – AS(/NZS)AS1668 – Air Handling System – Mechanical Ventilation – Fire Safety System – Appropriately Qualified Person – Design Certifier who is an Australian Building Codes Board identified Registered Fire Systems Designer (refer Page 10) in order for the user to understand the contents of this publication

Special Note!

SN1 The above twelve (12) Sections of Queensland Legislative Reference are as at the date of this Revision 2: 31.03.25.

Queensland Dictionary QLR Suffix explanations –

The *QLR* references that are provided in this (QUEENSLAND) DICTIONARY are the above *QLR* with the below suffix references added.

If a *Date* suffix is omitted, then this *Date* information is to be referred to the above-mentioned **Appropriate Authority (Building Certifier)** for clarification.

A *Section* suffix reference after the *Date* suffix is abbreviated to *S* plus the *Section Reference*.

A *Schedule* suffix reference after the *Section* suffix is abbreviated to *Sc* plus the *Schedule Reference.*

Section A

Terms and Words – Legislative Meanings

[With Queensland Legislative Reference Date*1 (*1 QLRD:)]

(Refer to Appendix A for QLRD Information)

Appropriate Authority which was first legislatively introduced nationally 1 May 2013 (Refer Part B on Page 15) In compliance with Queensland Standard Building Regulation 1993 Code – QLRD: Adoption of QBCA96 – V1: 1 July 1997 means –

Part A ***building certifier****1, except for parts 11 and 12*2, means –

(a) if a ***private certifier****3 approved ***building work****4 – the ***private certifier****3 for the ***building work****4; or

(b) if the ***assessment manager****5 approved ***building work****4 – the ***assessment manager****5***'s building certifier****1 for the ***building work****4. *(QLR: QSBR1993S5).*

*1(a) *"**prescribed qualifications****1(a)*", for different levels of accreditation as a **building certifier****1*, means –*

*(a) the current education and experience accreditation issued by AIBS for the following levels of **building certifier****1 *accreditation –*

(i) a building surveyor.

(ii) an assistant building surveyor.

(iii) a building surveyor technician; or

(b) any other education and experience accreditation that AIBS considers is equal to education and experience accreditation issued by AIBS. (QLR: QSBR1993S5).

SPECIAL NOTE

SN1 The BCA96 – V1: 1 July 1997 PART 2 Section A2.2 (a) (iii) (A) and (B) introduced certification from another *appropriately qualified person*. Refer to Page 15 for the meaning of another *appropriately qualified person*.

*1(b) ***"building certifying functions****1(b) *means the following functions or powers that under this regulation are to be performed or exercised by a building certifier –*

*(a) assessing and deciding **development applications****6*;*

(b) inspecting or accepting certification on the building or demolishing of buildings and structures for compliance with the Act;

(c) issuing certificates or statements of classification. (QLR: QSBR1993S5).

*2 *PART 11 – ACCREDITATION OF BUILDING CERTIFIERS and PART 12 – REGULATION OF CERTIFIERS. (QLR: QSBR1993S5)*

*3 ***"private certifier"****3 + 3(a) has the meaning given by the *Integrated Planning Act 1997*, section 5.3.3.4

*3(a) *Integrated Planning Act 1997*, section 5.3.3(1) (What is a private certifier)–

A ***"private certifier"*** is a person or public sector entity that carries out certification work under written contractual arrangements with clients. *(QLR: QBA1975S3)*.

Integrated Planning Act 1997, section 5.3.3.4 –

5.3.3 Who is a *private certifier*

(1) A ***private certifier*** is –

(a) an individual who –

(i) has the qualifications, necessary experience or licence prescribed under a regulation made under this or another Act for a certifier for a stated code; and

(ii) enters into contractual arrangements with clients to certify work for the code; and

(iii) carries out certification work for the code;

(b) corporation or public sector entity that –

(i) employs an individual mentioned in paragraph (a) to carry out the work for the corporation or entity; and

(ii) enters into contractual arrangements with clients to provide certification work that the individual carries out.

(2) To remove any doubt, it is declared that a development application is not a contractual arrangement under subsection (1). *(QLR: QIPA1997S5.3.3)*

***Appropriate Authority** (CONTINUED)*

Part A

*4 ***"building work"***4 + *4(a) + *4(b) *has the meaning given by the Integrated Planning Act 1997, section 1.3.5.2 (QLR: QBA1975S3).*

*4(a) ***building work***4 –

1 ***Building work***4 *means –*

(a) building, repairing, altering, underpinning (whether by vertical or lateral support), moving or demolishing a building or other structure; or

(b) work regulated under the Standard Building Regulation 1993; or (QLR: QIPA1997S1.3.5).

*4(b) ***building work***4 is ***assessable development***4(b) which has the meaning given by the Integrated Planning Act 1977 Schedule 8 Part 1 Table 1.

Schedule 8 Assessable development4(b) ***and self-assessable development***

Part 1

Table 1: Building work4

For the Standard Building Regulation a

Item 1

For assessing building work against the Standard Building Regulation, ***building work***4 *that is not –*

(a) self-assessable; and

(b) declared under the Standard Building Regulation to be exempt development.

a ***Table 1**, Item 1 commenced 30 March 1998. (QLR: QIPA1997Sc8)*

*5 ***"assessment manager"***5 *for a development application to which this regulation applies, means the person who would have been the* ***assessment manager***5 *if a* ***private certifier***3 *had not been engaged for the development. (QLR: QSBR1993S5).*

*6 ***"development application"***6 + 6(a) *means the aspect of a* ***development application***6 *for* ***building work***5 *under IPA requiring assessment against this regulation. 3 (QLR: QSBR1993S5).*

3 Under IPA, Schedule 10 (Dictionary)–

"development application"6 *means an application for a* ***development***6(a) + *7 + *8 *approval. (QLR: QSBR1993S5).*

*6(a) ***Development***6(a) *is any of the following –*

(a) carrying out ***building work***4 + 4(a)*. (QLR: QIPA1997S1.3.2).*

*7 ***applicable code**,*7 + *7(a) *for* ***development***6(a)*, means a code, including a concurrency agency code, that can be identified as applying to the* ***development***6(a)*. (QLR: QIPA1997Sc10).*

*7(a) ***code** means a document or part of a document identified as a code–*

(a) in a planning instrument; or

(b) for IDAS in this Act or another Act; 213 or

(c) in a primary approval.

213 Under the Acts Interpretation Act 1954, section 7, Act includes a reference to a statutory instrument made or in force under an Act. (QLR: QIPA1997Sc10).

*8 ***assessable development***8 + *8(a) *means –*

(a) development specified in schedule 8, part 1; or

(b) for a planning scheme area – development that is not specified in schedule 8, part 1 but is declared under the planning scheme for the area to be assessable development. (QLR: QIPA1997Sc10).

Appropriate Authority *(CONTINUED)*

Part A *8(a) ***assessable development***8 *means –*

Schedule 8 Assessable development and self-assessable development

Part 1 Assessable development

Table 1: Building work

For the Standard Building Regulation a

Item 1

For assessing building work against the Standard Building Regulation, building work that is not –

(a) Self-assessable; and

(b) Declared under the Standard Building Regulation to be exempt development.

a Table 1, item 1 commenced 30 March 1998. (QLR: QIPA1997Sc8).

Part B ***Appropriate authority*** *has the meaning provided in the Queensland Building Assessment Provisions: 5 April 2013 – Queensland National Construction Code Series 2013 (BCA2013) – Volume 1: 1 May 2013 that reads; the relevant authority with the statutory responsibility to determine the particular matter. (QLR: QNCC2013V1:010513SA1.1)*

Part C ***Appropriate authority*** *has the meaning provided in the Queensland Building Assessment Provisions (Assessment Benchmarks): 1 January 2018 – Queensland National Construction Code 2019 (BCA2019) – Volume 1: 1 May 2019 that reads; relevant authority with the statutory responsibility to determine the particular matter.*

Explanatory information:

*The **Appropriate Authority** is typically the building surveyor or building certifier charged with the statutory responsibility to determine building compliance and issue the building permit/approval and occupancy certificate/approval. (QLR: QNCC2019V1:010519Sc3).*

Appropriately Qualified Person which was first legislatively introduced nationally 1 July 1997 was introduced into Queensland by way of the Queensland Standard Building Regulation 1993 Code adoption of QBCA96 – V1: 1 July 1997 means –

Part A The Qld Building Code of Australia 96 – Volume 1: 1 July 1997 – PART A2 ACCEPTANCE OF DESIGN AND CONSTRUCTION Section A2.2 Evidence of suitability (a) (iii) requires a certificate from another ***appropriately qualified person*** –

PART A2 ACCEPTANCE OF DESIGN AND CONSTRUCTION

A2.2 Evidence of suitability

(a) Subject to A2.3 and A2.4, evidence to support that the use of a material, form of construction or design meets a Performance Requirement or a deemed-to-satisfy provision may be in the form of one or a combination of the following:

(iii) A certificate from a *professional engineer* or other ***appropriately qualified person*** which–

(A) Certifies that a material, design or form of construction complies with the requirements of the BCA; and

(B) Sets out the basis on which it is given and the extent to which relevant specifications, rules, codes of practice or other publications have been relied upon. *[QLR: QBCA96V1SA2.2(a)(iii)].*

SPECIAL NOTE

SN1 Prior to the Queensland National Construction Code Series 2013: 1 May 2013 – Volume One – PART A1 Section A1.1 introduction of; *Appropriate authority* means the relevant authority with the statutory responsibility to determine the particular matter, the ONLY *Appropriate Authority* to determine who was a Building Code of Australia 96 – Volume 1: 1 July 1997 – PART A2 ACCEPTANCE OF DESIGN AND CONSTRUCTION Section A2.2 (a) (iii) *appropriately qualified person* for design certification of a Building Code of Australia 96 – Volume 1: 1 July 1997 – AS(/NZS)1668 Mechanical Ventilation Systems – Fire Safety Systems was Queensland Logan TAFE by way of their CN941 Diploma and ESSENTIAL Award Elements (Competency Recognitions) M00 EB141 and M00 EB142.

Part B The Qld National Construction Code (Building Code of Australia) – Volume 1: 1 May 2019 Schedule 3 meaning of ***Appropriately Qualified Person*** is reproduced below.

Appropriately Qualified Person means a person recognised by the ***Appropriate Authority*** as having qualifications and/or experience in the relevant discipline in question.

Refer to Page 10 for a meaning of **Discipline**.

OUR RESPONSE

(Reference: PPW – TOR – Otipotcs)

Preamble to our Response Reference: PPW – TOR – Otipotcs

Our Response Contents Page i explains that our response has been developed in four (4) sections that are summarised below.

SECTION 1 – PREFACE AND REDACTION AUTHORISATION – Pages 1 – 2.

SECTION 2 – TERMS OF REFERENCE – Pages 3 – 4.

SECTION 3 – EXTRACT FROM THE PPW GROUP (QUEENSLAND) DICTIONARY FOR PUBLIC VIEWING – Pages 4 – 15.

SECTION 4 – OUR RESPONSE – PAGES 16 – 20

Our response is Section referenced in the order that the above Sections read.

This "OUR RESPONSE" Section of our Response is intended to highlight NON – COMPLIANCE **Fire Safety Concerns** that are associated with NON – COMPLIANT ***Approved Design****3 given that it is understood that COMPLIANT ***Approved Design****3 is the STARTING POINT for increased productivity in the Building Construction aspect of the Building Industry.

SECTION 1 – PREFACE AND REDACTION AUTHORISATION

Reproduced below is some preamble and four (4) questions that appear to The PPW Group to be yes/no with qualifications type questions that ALL responsible National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety System – Stakeholders should be capable of answering.

There are as many unanswered questions as there are NON – COMPLIANCE **Fire Safety Concerns.**

These types of questions have been ignored when highlighted in our library of previous submissions of this kind.

We look forward to the possibility of receiving answers to these questions from the Queensland Government.

To improve Building Construction Productivity, PPW understand that all three levels of Government; Federal, State/Territory and Local Governments MUST have access to an ***Appropriate Authority****1 (Building Certifier) recognised ***Appropriately Qualified Person****2 Design Certifier in order to understand current NON – COMPLIANCE **Fire Safety Concerns.**

Q1) Is a Queensland Building and Construction Commission (QBaCC) licensed ***Appropriate Authority****1 (Building Certifier) qualified to recognise a Queensland National Construction Code (Building Code of Australia) – Volume 1 – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier is appropriately qualified in compliance with the COMPLEX Queensland Regulatory Framework?

Q2) Are there QBaCC licensed ***Appropriate Authority****1 (Building Certifiers) who have recognised a Queensland National Construction Code (Building Code of Australia) – Volume 1 – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier is appropriately qualified?

Q3) Do the QBaCC licensed ***Appropriate Authority****1 (Building Certifiers) who have recognised a Queensland National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety System – ***Appropriately Qualified Person****2 Design Certifier as being appropriately qualified understand that the Queensland Logan TAFE CN941 Diploma and the Award Elements (Academic Competency Recognitions) M00 EB141 and M00 EB142 are the ONLY academic qualifications for recognising the competency of National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety Systems – ***Appropriately Qualified Person****2 Design Certifier?

Q4) Does Queensland Government consider a NO answer to **Q2)** to be a **SERIOUS FIRE SAFETY CONCERN** that should be addressed in order to improve productivity within the Building Construction Industry?

We seek the assistance from our Queensland Government to answer these questions, which we understand will greatly improve productivity and the safety of the People of Queensland.

SECTION 2 – TERMS OF REFERENCE

We understand that our response is within the TERMS OF REFERENCE (TOR).

Some of the TOR are dot points 4, 5, 6 and 11.

We iterate our above input that reads; **To improve Building Construction Productivity, PPW understand that all three levels of Government; Federal, State/Territory and Local Governments MUST have access to an *Appropriate Authority**1 (Building Certifier) recognised *Appropriately Qualified Person**2 Design Certifier in order to understand current NON – COMPLIANCE Fire Safety Concerns.**

However, given that our response will be posted publicly, if any aspect of our response is considered to be unsuitable for public posting then we provide this "Redaction Authorisation".

TOR 4, 5, 6 and 11 have been reproduced below.

- **4** factors shaping Queensland's productivity performance including commonwealth, state and local government legislation and regulation, industrial relations matters, procurement policies and labour force needs (individually, cumulative or through duplication) and opportunities for improvement
- **5** the opportunities for improvement in productivity in Queensland including regulatory and non-regulatory mechanisms
- **6** priority areas for reform for the Queensland Government to efficiently address identified challenges in the short, medium and long term (including but not limited to labour availability, skills availability and market competition, the availability of suitably qualified head contractors and sub contractors etc)
- **11** how government procurement and contracting arrangements, including Best Practice Industry Conditions, affect productivity in the construction sector, and how practices and policy settings can be improved

SECTION 3 – EXTRACT FROM THE PPW GROUP (QUEENSLAND) DICTIONARY FOR PUBLIC VIEWING

Section **1-A** on Page 7 of our (QUEENSLAND) DICTIONARY extract, which has been reproduced below states publically that The PPW Group Registered Fire Systems Technical Designer has been competent person assessed under the complex Queensland Regulatory Framework as being a **Queensland Building Code of Australia 1996 (QBCoA1996) – Volume 1 (V1) – Clause A2.2 – [AS(/NZS)1668 – Mechanical Ventilation – Air Handling Systems – Fire Safety Systems – Other Appropriately Qualified Person**.

1-A Our Engineer's Qualifications

After years of research into the availability of a qualification that would recognise Wayne's experience, knowledge and skills it became apparent that there was only one (1) academic* competency recognition pathway available for an [AS(/NZS)1668 Air Handling Systems] – Prescriptive Standards Engineer to have their experience, knowledge and skills competency assessed and recognised.

* academic means competency recognition by a College, University or other Registered Training Organisation.

The recognition pathway was to have the experience, knowledge and skills academically competency assessed against the **CN941 Diploma of Engineering** program and in particular, the below two (2) Award Elements –

i) Award Element **M00 EB141** Air Conditioning [AS(/NZS)1668 Air Handling Systems] Codes and Regulations.

ii) Award Element **M00 EB142** Exhaust Systems [AS(/NZS)1668 Air Handling Systems] Design.

Wayne's qualification is Nationally recognised within the Australian Qualifications Framework.

Wayne has been competent person assessed under the complex Queensland Regulatory Framework as being a **Queensland Building Code of Australia 1996 (QBCoA1996) – Volume 1 (V1) – Clause A2.2 – [AS(/NZS)1668 – Mechanical Ventilation – Air Handling Systems – Fire Safety Systems – Other Appropriately Qualified Person**.

Summary Conclusion

There are a significant number of National Construction Code (Building Code of Australia) – Volume 1 – AS(/NZS)1668 Mechanical Ventilation – Fire Safety Systems – Stakeholder concerns to be addressed regarding non-compliance, fire safety and productivity improvement that are contained in The PPW Group accompanying extract from our (QUEENSLAND) DICTIONARY. Time does not permit us to address these in this submission.

If The PPW Group Registered Fire Systems Technical Designer has been INCORRECTLY competent person assessed under the complex Queensland Regulatory Framework then this should be a serious concern to the people of Queensland.

SECTION 4 – OUR RESPONSE CONCLUSION

We will conclude our response by drawing the readers attention to the Pages 8 and 9 of our (QUEENSLAND) DICTIONARY which have been reproduced below for convenience.

1-B The Author's Experience *(Continued)*

v) **From the late 90's through to the early 2000's** with the introduction of the legislative requirement to be an Appropriately Qualified Person by way of the Building Code of Australia it became necessary for Wayne to become an [AS(/NZS)1668 Air Handling System] – Appropriately Qualified Person to continue his professional career.

vi) **The early 2000's through to 2006** became the most frustrating period of Wayne's professional career.
It took Wayne six (6) years to establish that there was only one (1) academic qualification that would academically recognise him as being competent to understand [AS(/NZS)1668 Air Handling Systems] Design Codes and Regulations.
During 2006 Wayne was academically recognised by Queensland's Logan TAFE College CN941 Diploma Program as being appropriately qualified to competently understand [AS(/NZS)1668 Air Handling Systems] Design Codes and Regulations.
Wayne's academic competency recognition is NATIONALLY recognised within the Australian Qualifications Framework.

vii) **From 2006 through to 2015** Wayne started on a journey of interacting with Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Stakeholders in an endeavour to establish a mutual understanding of the Queensland Legislative Regulatory Framework. Wayne's Father had taught him to *firstly establish what the rules are and then to ensure that Wayne played by the rules*!
Wayne spent nine (9) years interacting with most levels of stakeholders and researching [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Legislative Regulatory Frameworks.
Wayne needed to firstly establish what the rules were to ensure that he was able to play by the rules.
After nine (9) years of research into the Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Air Handling Systems] – Fire Safety Systems – Legislative Regulatory Framework and associated Legislation, it became apparent that significant ***Fire Safety Non-Compliance Concerns*** needed to be addressed.

viii) **From 2015 through to 2018** Wayne started three (3) years of research focused on the Tender Stage of Queensland Developments that incorporate Queensland Building Assessment Provisions Codes – [AS(/NZS)1668 Kitchen Hood Local Exhaust Ventilation] – Fire Safety Systems.
PPW now have a library of Tender Documents that reveal ***Fire Safety Non-Compliance Concerns*** exist at all stakeholder levels in Queensland.

ix) **From 2018 through to present** Wayne has focused on achieving three (3) **P**rimary **O**bjective –

PO1 To develop a National Dictionary of National Construction Code – Volume 1 – [AS(/NZS)1668 Air Handling Systems] – State and Territory – Legislative Regulatory Framework Terms, in response to the Shergold Weir Report. This is proving to be an ambitious task.

PO2 To commence engagement with the seventy seven (77) Queensland Local Governments to establish a mutual understanding of the meaning of the Queensland Building Assessment Provisions Codes term "National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Compliant Approved Design".
Some initial feed back from Queensland Local Government regarding the regulation of "National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Compliant Approved Design" for Queensland Government Buildings has been that it is NOT FINANCIALLY VIABLE due to Queensland Building Act 1975 Section 2(2).
Queensland Building Act 1975: 2 October 2022 Section 2 is reproduced below.

2 Act binds all persons

(1) This Act binds all persons, including the State, and, as far as the legislative power of the Parliament permits, the Commonwealth and the other States.

(2) **NOTHING IN THIS ACT MAKES THE STATE LIABLE TO BE PROSECUTED FOR AN OFFENCE.**

1-B **The Author's Experience** *(Continued)*

PO3 To commence engagement with the States and Territories outside of Queensland in order to gain National awareness of the National Construction Code – Volume 1 – Clause A2.2 – [AS(/NZS)1668 Air Handling Systems] – Appropriately Qualified Person Qualifications.

1-C **The Author's knowledge**

Wayne has been a member of the Standards Australia Technical Sub Committee ME062 – 02 (AS1668:2) since 2009.

Foot Notes!

FN3 PPW AS1668 Air Handling Systems Designs has engaged with Standards Australia to ***clarify why Wayne's Standards Australia Technical Sub Committee ME062 – 02 (AS1668:2) Membership was terminated*** *which is ongoing as part of a formal complaint as at the time of this QUEENSLAND DICTIONARY Revision 2: 31.03.25.*

FN4 Part of the PPW AS1668 Air Handling Systems Designs ongoing formal complaint includes, however, is not limited to, clarification of Standards Australia publication titled Nominating Organisation Guide – Rules and responsibilities and their representatives – Version: 2.0 Revision 22/10/2019 and Version: 2.1 Revision 15/11/2021, ***relevant to their approval of DR AS1668.2.2023****, that in part reads; Page 8* ***Section 1.3 Roles and responsibilities*** *| It is expected that a Nominating Organisation will | regarding "Selection of your representatives" | Have a transparent documentation process for appointing representatives to Standards Australia's (SA) Technical Committee(s) | Ensure your representatives are* ***appropriately qualified****, knowledgeable and empowered to effectively contribute to the work of the committee.*

The ABCB BCR (Building Confidence Report) Implementation Team wrote on 19th August 2020: ***as such we HAVEN'T PRESCRIBED AS1668 AIR HANDLING SYSTEMS as this is very specific to the mechanical and fire systems installation disciplines and part of STANDARDS AUSTRALIA KNOWLEDGE IN DESIGNING SYSTEMS.***

The Author posed the below **R**equest **f**or **A**ssistance **1** (**RfA1**) to Standards Australia to obtain their position regarding the above ABCB BCR (Building Confidence Report) Implementation Team statement.

RfA1 Could we please ask for your assistance to clarify if Standards Australia supports the above ABCB BCR (Building Confidence Report) Implementation Team statement ?

The Standards Australia response to the Authors's **RfA1** was –

THE IMPLEMENTATION OF THE BCR IS A MATTER FOR THE ABCB AND NOT US.

WE DON'T HAVE VIEWS ON IT AND YOU SHOULD DIRECT YOUR CORRESPONDENCE TO THE ABCB.

1-D **The Author's skills**

Wayne is an ***appropriately qualified*** prescriptive standard designer, certifier, manufacturer, installer, commissioner, inspector, service technician, annual report certifier and compliance documentation guidance provider of [AS(/NZS)1668 Air Handling Systems] and associated prescriptive standards.

1-E **Registered Fire Systems Technical Designer**

The Building Ministers' Forum (BMF), now the Building Ministers Meeting (BMM), authorised an assessment of the effectiveness of compliance and enforcement systems for the building and construction industry accross Australia.

The resulting Shergold and Weir Building Confidence Report 22 February 2018 (BCR 22.02.2018.) **highlighted shortcomings in the implementation of the National Construction Code** and made twenty four (24) recommendations to address these issues.

The BCR highlights the need for action in the building industry, including the need for a more effective building practitioner registration scheme.

The Australian Building Codes Board (ABCB) published the "National Registration Framework for Building Practitioners – Discussion paper – 2020 Version 1.0 dated 26th June 2020".

This discussion paper identified the "Registered Fire SystemsTechnical Designer"information on Page 10.

The "Registered Fire Systems Technical Designer " information on Page 10 has been reinforced by the ABCB publication "National Registration Framework for building practitioners - Model guidance on BCR recommendations 1 and 2 – 2021 v1.0 dated 10/12/2021".

The PPW Group Engineering Manager Wayne Palmer is a QNCC V1 ***Appropriate Authority*** recognised AS(/NZS)1668 Air Handling Systems – Mechanical Ventilation ***Appropriately Qualified Person*** Design Certifier who has been ***Competent Person*** decided and recorded (registered) under the complex Queensland Regulatory Framework.

PPW have contributed considerable input investment over my sixty (60) years in the Queensland Building Construction Industry.
The PPW Library is full of submissions that have been ignored.
We await the opportunity from the new Crisafully Government to be invited to engage with appropriately qualified like-minded Government Representative Stakeholders to address matters that are raised in the submission.
We offer our sincere apologies for any inconvenience associated with typos or error that may be an outcome of our not undertaking a thorough proof read.

Warm Regards,

[redacted]

Lloyd Wayne (Known as Wayne) Palmer,
Senior Member,
The PPW Group,
AS1668 Air Handling Systems Designs.