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15 Oct 2018

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Planning Engagement
Department of Planning, Transport & Infrastructure
PO Box 1815
Adelaide SA 5001

Re : Accredited Professionals Scheme – Draft Regulations & Associated Documents

I wish to provide the following comments in relation to the draft Accredited Professionals Regulations and the associated documents relating to required qualifications, experience and technical skills for accredited professionals.

Public vs Private

The draft regulations and associated documents outline accreditation levels and the associated qualifications and experience for planning and building surveying professionals, but does not differentiate between those operating in the public sector and those operating in the private sector. It is understood that it may be proposed that all levels of building surveyors will be able to operate in the private sector.

The performance of a statutory function in a private sector environment is difficult, with a constant tension between upholding community standards and expectations and the need to serve clients with commercial priorities. A higher level of professionalism, ethics and experience are required to operate in this environment.

Private certification has been the subject of review in most States of Australia in recent years with all identifying issues that require resolution and action. It has been identified that the appropriate balance between community interest / upholding the standard of the built environment and commercial interests and pressures has not been achieved. Various issues of this type were once again identified in the recent Shergold Weir report.

In many States private certification by building surveyors is restricted to the upper levels of accreditation, ensuring that only the most qualified and experienced building surveyors can operate in the private realm. The differentiation in the experience requirements between those who operate in the public sector and those that operate in the private sector must remain. Any proposal to reduce the levels of qualification and experience for a building surveyor operating in the private sector below the current Level 1 Building Surveyor with 7 years experience will only exacerbate the issues identified by the various State reviews and the Shergold Weir report with serious consequences for the standard of the built environment and the community's confidence in the building regulatory system.

Audit

The Regulations place the onus for ensuring that an audit is undertaken within specified time periods on the accredited professional. As the recent history of auditing of building professionals in SA has shown it is generally the limitations of State Government resources that have prevented audits being undertaken within stipulated time frames. If similar State Government resourcing issues were to be repeated in the future accredited professionals would be placed in a difficult position

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if they are to be held accountable for ensuring audits within specified time frames. It is suggested that the proposed regulation should be altered to only require accredited professionals to make themselves available for audit within specified time periods.

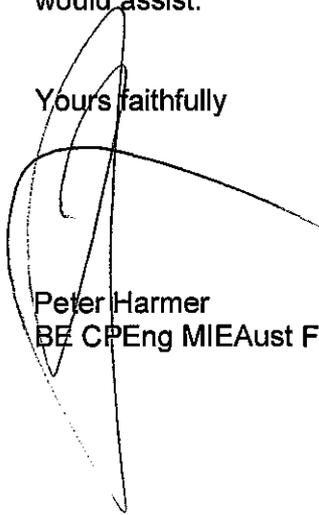
Draft Accredited Professional Qualifications, Experience and Technical skills

The experience specified for building surveyors to assess building related performance based designs appears grossly inadequate. A building surveyor with only 6 months experience (ie level 3 building certifier) could undertake assessments of performance solutions for domestic buildings and a building surveyor with only 2 to 3 years experience (ie level 2 or 1 building certifier) could undertake assessments of performance solutions for commercial buildings. The assessment of performance based designs by building surveyors will typically involve life safety issues, often affecting risks for large numbers of persons. It is suggested that the years of experience required to undertake performance solutions for building surveyors should be increased substantially

The current regulations allow the third tier building surveyors to assess small scale commercial developments (ie < 500m²). The draft regulations and associated documents however seeks to limit Level 3 building surveyors to domestic buildings. This is a lessening of current accepted responsibility levels for level 3 building surveyors without any explanation or demonstrated need. In regional areas the inability for Level 3 building professionals to undertake the assessment of proposals for small scale commercial buildings in country towns will have a significant impact on Council resources (as external resources will be required) and the advisory services that can be provided to business owners by Council.

Thankyou for the opportunity to comment on these matters. I would be pleased to discuss any of the above matters or any other associated matters with you if this would assist.

Yours faithfully



Peter Harmer
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