



Australian Institute of Building Surveyors

Accreditation Team Leader
The Building Professionals Board
PO Box 3720,
PARRAMATTA NSW 2124

Dear Sir / Madam,

SUBMISSION: PROPOSED CRITERIA FOR CATEGORY A5 PORT CERTIFIERS

We refer to the Building Professionals Board invitation for feedback on criteria for private certifiers Category A5 intended to assess infrastructure at major NSW ports and thank you for the opportunity to comment on the proposed amendments to the Building Professionals Board Accreditation Scheme.

The Australian Institute of Building Surveyors (AIBS) represents both private and local government Building Surveyors and related industry professionals. Building Surveyors are professional persons who are experts in a wide range of building legislation, technical codes and construction standards applicable to all types of structures.

Building Surveyors have the appropriate skills, knowledge and experience to certify buildings and structures in accordance with relevant building legislation in all jurisdictions in Australia to permit commencement of construction and then manage the inspection process from foundations through to completion. The role of issuing building permits for the purpose of construction works is fundamentally the professional function of a Building Surveyor.

AIBS supports public policy underpinned by legislation that promotes a cost effective approval process designed to deliver cost effective construction, environmentally efficient and sustainable buildings, enhanced amenity of buildings and to protect the safety and health of people who use buildings or structures. To this extent we support the removal of certification limitations within the State Environmental Planning Policy (Three Ports) 2013 (Three Ports SEPP) in respect to unclassifiable structures.

However, AIBS is opposed to the proposed criteria for an A5 accredited certifier to be listed with the National Engineering Board's National Professional Engineers Register (NPER) for the following reasons:

- We are of the opinion that an A5 certifier is not required to be a specialist engineer just because the types of structures involved may be outside the scope of the Building Code of Australia.
- We are opposed to the professional skills of a Building Surveyor being distilled into a short course for engineers to obtain accreditation. The process of building permit approvals requires not only technical expertise but also necessitates on job experience under direct supervision of qualified Building Surveyors before delegation of authority is achieved. A short course is not a substitute for these skills and training.
- Traditionally the council Building Surveyor has undertaken the role of certifying ports infrastructure regardless of whether the structure was classifiable or not under the BCA. For

the sake of uniformity and consistency in the approvals process, the certification role should remain with Building Surveyors.

- A Building Surveyor with years of experience certifying ports infrastructure could only continue to do so under the proposed criteria if he/she remained a local government Building Surveyor. Regardless of such a person's expertise they would not be eligible for A5 accreditation.
- A Building Surveyors role is to certify buildings and structures that possess complex engineering components necessitating specialist engineers design input to the certification process. The complexity of any such unclassifiable structures is therefore not outside the expertise of a Building Surveyor.
- A Building Surveyors role in respect to certification of buildings and structures involves detailed knowledge and skills concerning the application of building legislation, standards and codes and is not limited to the application of the Building Code of Australia.
- Specialist engineers with port expertise would typically be involved in design work and therefore not eligible to do both roles limiting the availability of professionals who would meet the current Port Certifier criteria.
- It is our opinion that many of the structures identified in the BPB press release such as fixed cranes, ship loaders, storage tanks & silos are classifiable under the BCA. It is therefore unnecessary to create a separate accreditation category for such limited infrastructure that is unclassifiable, particularly when the building permit approval process remains essentially the same undertaken for a classifiable structure.

In conclusion we are of the view that the proposed change to the Building Professionals Board Accreditation Scheme and specifically the criteria for an A5 Ports Certifier to be NPER registered encroaches and unnecessarily restricts the traditional role of a Building Surveyor in certifying ports infrastructure. Whilst we do consider the creation of an A5 certifier unnecessary we are totally opposed to the eligibility exclusion for Building Surveyors who are professionals that are specifically trained to undertake any type of building permit approval process.

If you wish to discuss further please do not hesitate to contact the AIBS office on 1300 312 427 or email chapteradmin2@aibs.com.au.

Kind regards,



Damian O'Shannassy
President, AIBS NSW/ACT Chapter