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17 December 2014

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

Dear Sir / Madam,

SUBMISSION: PROPOSED CRITERIA FOR CATEGORY A5 PORT CERTIFIERS

I am a qualified Building Surveyor with over 30years of experience having worked in both Local Government and private consultancies.

I have personally certified numerous Port Projects including infrastructure works for Statutory authorities such as Sydney Ports, Sydney Harbour Foreshore Authority and Barrangaroo Authority.

As a qualified Building Surveyor I am 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:

- I am 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.
- I am opposed to the professional skills of a Building Surveyor being distilled into ashort
 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
 he 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 my 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.

If you wish to discuss any of the above Please do not hesitate to contact me on 0143457771

Yours Faithfully

Sean Connolly

Consult Code Solutions