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# Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

## Total Submissions

Initial Submission Amdt 1 Submitted Tuesday 10 June 2025 2:34 pm

*(Submission Month July was a Typo)*

Part A Submission Tabled at Monday 11:00AM 07.07.25 Meeting

Part B CONCLUDING SUMMARY RESPONSE

*(Submitted Friday 29 August 2025)*

Part B CONCLUDING SUMMARY RESPONSE APPENDIX 1

*(Submitted Sunday 31 August 2025)*



Queensland Productivity Commission

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Primary Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

[Redacted]

[Redacted]

## ***CONTENTS***

### **Queensland Productivity Commission**

#### **OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR**

### **Total Submissions**

#### **SECTION 1**

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#### **SECTION 2**

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#### **SECTION 3**

Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025

#### **SECTION 4**

Part B CONCLUDING SUMMARY RESPONSE APPENDIX 1 Submitted Sunday 31 August 2025

#### **SECTION 5**

Post PPW Responses engagement with Queensland Productivity Commission Inquiry (QPCI) Stakeholders

#### **SUB SECTIONS CORRESPONDENCE EXPLANATIONS**

PPW engagement with QPCI Stakeholders: QPCI Assessment Team S42; S36; S37; S39; S18; S31; S13 and S32, to conclude Part B CONCLUDING SUMMARY RESPONSE Page 24 Un-concluded Matter SECTION 2

##### **SUB SECTION 1**

QPCI Stakeholder S42: QPCI Assessment Team

##### **SUB SECTION 2**

QPCI Stakeholder S36: Interim CEO of the ABCB Office Judith Blake (Australian Government)

##### **SUB SECTION 3**

QPCI Stakeholder S39: Standards Australia Head of Standards Development Richard Lambert (Australian Peak Industry Body)

##### **SUB SECTION 4**

QPCI Stakeholder S37: Chair of Building Ministers Meeting (BMM) Judith Blake (Federal Government)

##### **SUB SECTION 5**

QPCI Stakeholder: S18 Honourable Queensland Premier David Crisafulli (State Government)

##### **SUB SECTION 6**

QPCI Stakeholder: S31 Honourable Queensland Minister Samuel O'Connor Qld BMM Attendee (State Gov)

##### **SUB SECTION 7**

QPCI Stakeholder: S13 Gympie State Government Member Anthony Perrett (State Government)

##### **SUB SECTION 8**

QPCI Stakeholder: S32 Gympie Regional Council Mayor Glen Hartwig (Local Government)

## SECTION 1



# 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)

(Amendment 1 – Corrections of Typos/Errors/Omissions – Page 21 – 22 Email Submitted 10 July 2025)



Queensland Productivity Commission



# Response Contents

## SECTION 1

PREFACE AND REDACTION AUTHORISATION

Page 1 - 2

## SECTION 2

TERMS OF REFERENCE

Pages 3 – 4

## SECTION 3

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

Pages 5 – 15

## SECTION 4

OUR RESPONSE **CONCLUSION**

Page 16 – 20

## **AMENDMENT 1**

**Page 21 – 22**

# 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) DICTIONARY 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) DICTIONARY for a legislative meaning of **Appropriately Qualified Person**\*2 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 **Question (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 a 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 ^ answer to **Q2)** is NO then the Queensland Government and the People of/in 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. **ie Non – compliance is NOT a PRODUCTIVE outcome.**

**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***

Publication:

AS1668 Air Handling Systems Designs – (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) is a **PPW Controlled Publication**. **Refer to Page 6 for Publication Rights Protection conditions.**

## 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 Technical Designer (refer Page 10) in order for the user to understand the contents of this publication.**

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## 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) Primary Objective –  
**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 19<sup>th</sup> 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 Request for Assistance **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 across 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 26<sup>th</sup> June 2020".

This discussion paper identified the "Registered Fire Systems Technical 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

Discipline

Occupations Covered

### Design Profession

Fire Safety Design

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	<b>Fire Systems Design – fire and smoke systems</b>	2			Fire systems design work for fire and smoke control systems for building complexity levels 0-2 DTS only	Approved <b>diploma</b> of fire services design that includes the relevant units applicable to this category of work, with <b>approved NCC training. CN941 Diploma + M00 EB141 + M00 EB142.</b>	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 INDEX

## 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 Technical Designer (refer Page 10) in order for the user to understand the contents of this publication.**

Terms and Words beginning with <b>A</b>	<b>Section A</b>
Terms and Words beginning with <b>B</b>	<b>Section B</b>
Terms and Words beginning with <b>C</b>	<b>Section C</b>
Terms and Words beginning with <b>D</b>	<b>Section D</b>
Terms and Words beginning with <b>E</b>	<b>Section E</b>
Terms and Words beginning with <b>F</b>	<b>Section F</b>
Terms and Words beginning with <b>G</b>	<b>Section G</b>
Terms and Words beginning with <b>H</b>	<b>Section H-I</b>
Terms and Words beginning with <b>I</b>	<b>Section H-I</b>
Terms and Words beginning with <b>J</b>	<b>Section J-K</b>
Terms and Words beginning with <b>K</b>	<b>Section J-K</b>
Terms and Words beginning with <b>L</b>	<b>Section L</b>
Terms and Words beginning with <b>M</b>	<b>Section M</b>
Terms and Words beginning with <b>N</b>	<b>Section N</b>
Terms and Words beginning with <b>O</b>	<b>Section O</b>
Terms and Words beginning with <b>P</b>	<b>Section P-Q</b>
Terms and Words beginning with <b>Q</b>	<b>Section P-Q</b>
Terms and Words beginning with <b>R</b>	<b>Section R</b>
Terms and Words beginning with <b>S</b>	<b>Section S</b>
Terms and Words beginning with <b>T</b>	<b>Section T</b>
Terms and Words beginning with <b>U</b>	<b>Section U-V</b>
Terms and Words beginning with <b>V</b>	<b>Section U-V</b>
Terms and Words beginning with <b>W</b>	<b>Section W</b>
Terms and Words beginning with <b>X</b>	<b>Section X-Y-Z</b>
Terms and Words beginning with <b>Y</b>	<b>Section X-Y-Z</b>
Terms and Words beginning with <b>Z</b>	<b>Section X-Y-Z</b>

# (QUEENSLAND) DICTIONARY

## APPENDIX A

### Queensland Legislative Reference Date\*1 (\*1QLRD)

### INDEX

#### 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 Technical Designer (refer Page 10) in order for the user to understand the contents of this publication

Queensland Building Act 1975 (QLR: QBA1975) S1	Section 1
Queensland Fire and Rescue Service Act 1990 (QLR: QFaRSA1990) S2	Section 2
Queensland Fire and Emergency Services Act 1990 (QLR: QFaESA1990) S3	Section 3
Queensland Standard Building Regulation 1993 (QLR: QSBR1993) S4	Section 4
Queensland Building Code of Australia 96 Volume 1 Amdt 0: 1 July 1997 (QLR: QBCoA96V1Amdt0) S5	Section 5
Queensland Integrated Planning Act 1997 (QLR: QIPA1997) S6	Section 6
Queensland Building Code of Australia 96 Volume 1 Amdt 4: 1 January 1999 (QLR: QBCoA96V1Amdt4) S7	Section 7
Queensland Building Services Authority Regulation 2003 (QLR: QBSAR2003) S8	Section 8
Queensland Building Fire Safety Regulation 2008 (QLR: QBFSR2008) S9	Section 9
Queensland Mandatory Part MP6.1 – Maintenance of Fire Safety Installations 2009 (QLR: QMP6.1:2009) S10	Section 10
Queensland National Construction Code Series 2013 Volume 1 (QLR: QNCC2013V1) S11	Section 11
Queensland National Construction Code 2019 Volume 1 (QLR: QNCC2019V1) S12	Section 12

#### 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 Date 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: QSB1993S5).

\*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: QSB1993S5).

### 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: QSB1993S5).

\*2 PART 11 – ACCREDITATION OF BUILDING CERTIFIERS and PART 12 – REGULATION OF CERTIFIERS. (QLR: QSB1993S5)

\*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**"\*3 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\*3

- (1) A **private certifier**\*3 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**\*8 which has the meaning given by the Integrated Planning Act 1977 Schedule 8 Part 1 Table 1.

### **Schedule 8 Assessable development\*8 and self-assessable development**

#### **Part 1**

#### **Table 1: Building work\*4**

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: QSB1993S5).

\*6 **“development application”**\*6 + 6(a) means the aspect of a **development application**\*6 for **building work**\*4 under IPA requiring assessment against this regulation. 3 (QLR: QSB1993S5).

3 Under IPA, Schedule 10 (Dictionary)–

**“development application”**\*6 means an application for a **development**\*6(a) + \*7 + \*8 approval. (QLR: QSB1993S5).

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

\*7(a) **code**\*7(a) 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\*8 and self-assessable development**  
**Part 1 Assessable development\*8**  
**Table 1: Building work\*4**  
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**. Refer to highlighted sections on Page 7.

- 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 CONCLUSION

(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 5 – 15.

**SECTION 4 – OUR RESPONSE CONCLUSION** – 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. **Refer to Page 1 for \*3 meaning.**

## 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**. **Refer to Pages 13 to 15 for meanings of \*1 and \*2.**

**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? **If yes to Q2) then –**

**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? **If NO to Q2) then –**

**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/in 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 **have** provided **our** “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/in** Queensland. Page 17



## 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) Primary Objective –  
**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 19<sup>th</sup> 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 Request for Assistance **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 across 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 26<sup>th</sup> June 2020".

This discussion paper identified the "Registered Fire Systems Technical 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 **pro bono\*9** input investment over my sixty (60) years in the Queensland Building Construction Industry.

**\*9 Pro bono\*9 means for the public good provided free of charge.**

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 **this** 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,



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

**03.06.25**



# AMENDMENT 1

## CORRECTIONS OF TYPOS/ERRORS/OMISSIONS

(Email Submitted 10 July 2025)

Page 20 of our response reads; We offer our sincere apologies for any inconvenience associated with typos and error that may be an outcome of our not undertaking a thorough proof read.

This Amendment 1 provides Corrections of Typos/Errors/Omissions that are required resultant from a more thorough proof read of our response. All text that forms part of this Response that is in green print forms part of this Amendment 1.

### SUMMARY OF AMENDMENT 1 (Amdt 1)

#### Cover Amendment –

Amdt 1(a) (Amendment 1 – Corrections of Typos/Errors/Errors/Omissions – Page 21 – 22 Email Submitted 10 July 2025) has been added.

#### Page i Amendments –

Amdt 1(b) SECTION 5 has been amended to SECTION 4.

Amdt 1(c) OUR RESPONSE has been amended to OUR RESPONSE CONCLUSION.

#### Page 1 Amendment –

Amdt 1(d) *Appropriately Qualified Person*\*9 has been amended to *Appropriately Qualified Person*\*2.

#### Page 2 Amendments –

Amdt 1(e) of National has been amended to of a National.

Amdt 1(f) Repeated if the has been deleted and replaced with ^.

Amdt 1(g) People of Queensland has been amended to People of/in Queensland.

Amdt 1(h) ie Non – compliance is NOT a PRODUCTIVE outcome has been added.

#### Page 6 Amendment –

Amdt 1(i) Systems Designer has been amended to Systems Technical Designer.

#### Page 11 Amendment –

Amdt 1(j) Systems Designer has been amended to Systems Technical Designer.

#### Page 12 Amendments –

Amdt 1(k) Systems Designer has been amended to Systems Technical Designer.

Amdt 1(l) the *Section* suffix has been amended to the *Date* suffix.

#### Page 13 Amendments –

Amdt 1(m) *“private certifier”* has been suffixed *“private certifier”*\*3.

Amdt 1(n) *private certifier* has been suffixed *private certifier*\*3.

Amdt 1(o) *private certifier* has been suffixed *private certifier*\*3.

#### Page 14 Amendments –

Amdt 1(p) *assessable development*\*4(b) has been amended to *assessable development*\*8.

Amdt 1(q) *assessable development*\*4(b) has been amended to *assessable development*\*8.

Amdt 1(r) *work*\*5 has been amended to *work*\*4.

Amdt 1(s) *applicable code*,\*7 has been amended to *applicable code*\*7.

Amdt 1(t) *code*, has been amended to *code*\*7(a),.

## SUMMARY OF AMENDMENT 1 (Amdt 1) (CONTINUED)

### Page 14 Amendments –

Amdt 1(u) *code* means has been amended to *code*\*7(a) means.

### Page 15 Amendments –

Amdt 1(v) *Assessable development* has been amended to *Assessable development*\*8.

Amdt 1(w) *Assessable development* has been amended to *Assessable development*\*8.

Amdt 1(x) *Building work* has been amended to *Building Work*\*4.

Amdt 1(y) Refer to highlighted sections on Page 7 has been added.

### Page 16 Amendments –

Amdt 1(z) OUR RESPONSE has been amended to OUR RESPONSE CONCLUSION.

Amdt 1(aa) Pages 4 – 15 has been amended to Pages 5 – 15.

Amdt 1(bb) OUR RESPONSE has been amended to OUR RESPONSE CONCLUSION.

Amdt 1(cc) PAGES 16 – has been amended to Pages 16 – 20.

Amdt 1(dd) Refer to Page 1 for \*3 meaning has been added.

Amdt 1(ee) Refer to Pages 13 to 15 for meanings of \*1 and \*2 has been added.

Amdt 1(ff) If NO to Q2) then – has been added.

Amdt 1(gg) If NO to Q2) then – has been added.

Amdt 1(hh) People of Queensland has been amended to People of/in Queensland.

### Page 17 Amendments –

Amdt 1(ii) We provide this “Redaction has been amended to we have provided our “Redaction.

Amdt 1(jj) people of Queensland has been amended to People of/in Queensland.

### Page 20 Amendments –

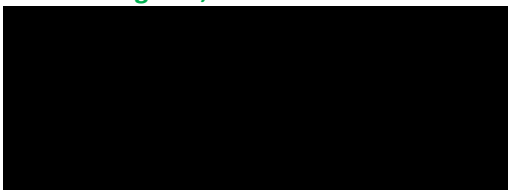
Amdt 1(kk) considerable input has been amended to considerable pro bono\*9 input.

Amdt 1(ll) \*9 Pro bono\*9 means for the public good provided free of charge has been added.

Amdt 1(mm) in the submission has been amended to in this submission.

Amdt 1(nn) 03.06.25 has been added.

Warm Regards,



Lloyd Wayne (Known as Wayne) Palmer,  
Senior Member,  
The PPW Group,  
AS1668 Air Handling Systems Designs.  
10.06.25

## SECTION 2



Our File Reference: PPW – TOR – Otipotcs.

File Opened: Friday, 30 May 2025 9:00 PM.

File Closed:

# Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

## Part A

**SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT  
AND  
FIVE (5) PPW PUBLIC LIBRARY EXTRACTS  
OF  
SUBMISSIONS  
REGARDING  
NATIONAL NON-COMPLIANCE CONCERNS**



Queensland Productivity Commission

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Primary Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

[REDACTED]

# **CONTENTS**

## **Queensland Productivity Commission**

### **OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR**

## **Part A**

### **SECTION 1**

**Australian Government – Australian Building Codes Board (ABCB) 22.09.24**

**RfI1** (Request for Information 1) Could we please ask ABCB to clarify if the ABCB consider this **NATIONAL FIRE SAFETY CONCERN** No 1 should be considered to be a **SERIOUS NATIONAL FIRE CONCERN** by the people of Australia.

### **SECTION 2**

**Federal Government – The Honourable Minister Ed Husic Building Ministers’ Meeting Chair + Twenty One (21) Stakeholders 24.10.23**

**RfAdv 004** (Request for Advice 1) PPW seeks advice from the BMM (Chair – Commonwealth Government, State Government Attendees and Territory Government Attendees) to clarify if they have access to National Construction Code 2019 – Volume 1 – PART A5 – AS1668 Air Handling Systems – Appropriately Qualified Person\*1 who understands that a Professional Prescriptive Engineer\*4 who has been issued a CN941 Diploma of Engineering (Refrigeration and Air Conditioning) and ESSENTIAL Award Elements M00 EB141 Air Conditioning – (AS1668 Air Handling Systems) codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) design is person reasonably available who holds an accreditation to perform the following regulated work under the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation):

b. *the endorsement of plans and specifications for relevant fire safety systems, being a ducted smoke control system only, under clauses 136AA and 146B,...*

### **SECTION 3**

**Queensland Government – QFaES Chief Superintendent Mark Kahler 27.10.24**

**RfM1** (Request for Meeting 1) Could we please ask if you are receptive to co-ordinating a meeting to discuss obtaining copies of the QFaES **decision notices** as per Section **M5 C** (b) on Page iv of the attached.

### **SECTION 4**

**Queensland Government – The Honourable Minister Samuel O’Connor Queensland Attendee Building Ministers’ Meeting 27.11.24**

**RfA1** (Request for Assistance 1) Would the Honourable Minister please assist us by providing us with the email contact details of the person in your department who works with the QFD to jointly administer the Queensland Regulatory Fire Safety Framework of Legislation.

## SECTION 5

**Queensland Government – Gympie Local LNP Member Tony Perrett 02.07.24**

**Technical Matter Reference:** QLNP – **FSC** – C5 – PartC001: **NATIONAL FIRE SAFETY CONCERN** that is associated with non **NATIONAL** recognition of the CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions M00 EB141 Air Conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) designs, that are recognised within the Australian Qualifications Framework.

## SECTION 6

**Queensland Government – The Honourable Premier Steven Miles; the Honourable Minister de Brinni Queensland Attendee Building Ministers’ Meeting; LNP Leader of Opposition David Crisafulli and Gympie Local LNP Member Tony Perrett 23.01.24**

**Q1)** (Question 1) Could we please ask that you confirm that you have been made aware of the above Technical Matter: **NATIONAL FIRE SAFETY CONCERN** ?

Reproduction of the above Technical Matter mentioned in **Q1)** –

Technical Matter: **NATIONAL FIRE SAFETY CONCERN** that is associated with **NON – NATIONAL** recognition of the Queensland Logan TAFE CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions and M00 EB141 Air Conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) designs, that are recognised within the Australian Qualifications Framework.

## SECTION 7

**Queensland Local Government – Townsville City Council – Technical Officer Alfio Romeo 24.04.25**

**Rfi1** (Request for Information 1) Could we please ask that you clarify if you are the appropriate TCC **QldFSCS – 35** Contact and if not, then could we please ask that you email us the email contact details of the appropriate TCC **QldFSCS – 35** Contact.

## SECTION 8

**Queensland Local Government – Rockhampton Regional Council – Senior Building Certifier Representative 28.10.24**

**Rfi2** (Request for Information 2) Would RCC please clarify RCC’s usual lead time for an appropriate person to read incoming correspondence.

## SECTION 9

**Queensland Local Government – Gympie Regional Council – Mayor Hartwig 26.10.24**

**Rfi1** (Request for Information 1) Would you please provide us with assistance to clarify the current process for gaining access to the Gympie Regional Council – Competent Persons Register.

## SECTION 10

**Standards Australia – The PPW Group – PPW – AS1668 Air Handling Systems Designs – DR AS 1668.2:2023 – Public Comments Submission – Complaint – Head of Standards Development Richard Lambert 29.06.25**  
**RfI3 (Request for Information 3)** Would you please confirm that Standards Australia does NOT object to PPW including a copy of "The PPW Group - PPW - AS1668 Air Handling Systems Designs - DR AS 1668.2:2023 - Public Comment Submission" in our bound publication submission to the abovementioned Queensland Productivity Commission Meeting.

## SECTION 11

**Australian Building Codes Board – BCR Implementation Team – Discussion Paper on BCR recommendation 19 – August 2021 – PPW Response 671562782 26.09.21**

**Question on Page 30 of 33** We would ask that BCR Implementation Team engage with us, in writing (email), to clarify their position regarding the above recommendation.

Above recommendation referred to in **Question on Page 30 of 33** is reproduced below.

It is recommended that independent commissioning/testing be undertaken in accordance with the Standards Australia Commissioning Standard.

With regard to NCC – V1 AS1668 Air Handling Systems that are **Fire Safety Systems** we recommend that an independent NCC – V1 AS1668 Air Handling Systems – **Fire Safety Systems** – Appropriately Qualified Person be engaged for testing and Declaration of Installation Compliance, given that the CN941 Diploma and M00 EB141 and M00 EB142 academic competency recognitions are recognised in all States and Territories.

## SECTION 12

**New South Wales Government – Regulatory Impact Statement – Design and Building Practitioners Regulation 2020 – November 2020 – PPW Response 11.01.21 Minister for Better Regulation and Innovation Kevin Anderson MP**

**Q1) (Question 1)** PPW asks the Honourable Minister Kevin Anderson MP if he would provide PPW with the contact details of the NSW Representative who is **responsible for recognising the qualifications of their class of NCC – V1 – Clause A 2.2 – AS1668 Air Handling Systems – Appropriately Qualified Persons** ?

**Q2) (Question 2)** PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree with the above **4B-C** PPW understanding ?  
Refer to Page 5 of our Response for our **4B-C** PPW understanding.

This **Q2)** refers to clarifying if the NSW Government recognise the Queensland Logan TAFE CN941 Diploma.

**Q3) (Question 3)** PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government is proposing **4C-A** (ii) and (iii) ?  
Refer to Page 6 of our Response for **4C-A** (ii) and (iii) information.

Refer also to **4F** on Page 11.

This **Q3)**, in part, refers to clarifying if the NSW Government has access to a NCC – V1 **Appropriately Qualified Person** who understands NCC – V1 AS(/NZS) 1668 Mechanical Ventilation Design Certification.



## SECTION 12 (CONTINUED)

**Q4)** (Question 4) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government is aware of **4D-B** above.

Refer to Page 7 of our Response for **4D-B** information.

This **Q4)** refers to clarifying if the NSW Government recognise the Queensland Logan TAFE CN941 Diploma.

**Q5)** (Question 5) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree that all **registered certifiers and principal certifiers** should be notified of the **4E-B** above class of **appropriate person** ?

Refer to Page 10 of our Response for **4E-B** information. Page 10 **4E-D** refers to “a copy of the Authors CN941 Diploma” which is filed in Section 15.

This **Q5)**, in part, refers to clarifying if the NSW Government understand a **principal certifier** is required to be a NCC – V1 **Appropriate Authority** who has **NO** statutory responsibility under the NSW NCC – V1 legislation.

**Q6)** (Question 6) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree **4F-D** above constitutes a **NATIONAL FIRE SAFETY CONCERN** ?

Refer to Page 13 of our Response for **4F-D** information.

**Q7)** (Question 7) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assistance Team to clarify in writing if the NSW Government agree this **4G-C** clarification constitutes a **NATIONAL FIRE SAFETY CONCERN** ?

Refer to Page 1 Section **1A** of our Response for the **Q7) 4G-C** information.

**Q8)** (Question 8) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Building and Development Certifiers Act 2018 No 63 to recognise or register a NSW NCC – V1 Clause A 2.2 AS1668 Air Handling Systems – Fire Safety Systems – Appropriately Qualified Person ?

**Q9)** (Question 9) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Environmental Planning and Assessment Act 1979 No 203 to recognise or register a NSW NCC – V1 Clause A 2.2 AS1668 Air Handling Systems – Fire Safety Systems – Appropriately Qualified Person ?

**Q10)** (Question 10) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Design and Building Practitioners Act 2020 No 7 to recognise or register a NSW Clause A 2.2 AS1668 Air Handling System – Fire Safety Systems – Appropriately Qualified Person ?

## SECTION 13

Refer to Page 9 of our Stakeholder Feedback for a “Brief Overview of my experience in the field of AS1668 Air Handling Systems”.

We have worked through the weekend, and it is now late Sunday 06.07.25 and we are out of time to provide further information to this QPC process prior to our

Meeting.

## SECTION 14

This “Response to Artibus Public Comment and Online Survey” contains information that highlights that it could be concluded that the non-national recognition of the Queensland Logan TAFE CN941 Diploma and ESSENTIAL Award Elements is a **NATIONAL FIRE SAFETY CONCERN**.

We have worked through the weekend, and it is now late Sunday 06.07.25 and we are out of time to provide further information to this QPC process prior to our [REDACTED]

[REDACTED] Meeting.

## SECTION 15

Certified copies of Authors CN941 Diploma of Engineering and Associated Award Elements that are **NATIONALLY recognised under the Australian Qualifications Framework 5**.

**PLEASE PHONE QUEENSLAND PRODUCTIVITY COMMISSION FOR A FULL COPY OF THIS SECTION 2**

[REDACTED]



## SECTION 3



Our File Reference: PPW – TOR – Otipotcs – Part B CONCLUDING SUMMARY RESPONSE to QUEENSLAND PRODUCTIVITY COMMISSION INQUIRY.

File Opened: Friday, 28 August 2025 PM.

File Closed:

# Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

## Part B

**CONCLUDING SUMMARY RESPONSE**

**to**

**QUEENSLAND PRODUCTIVITY COMMISSION  
INQUIRY**

*(Submitted Friday 29 August 2025)*



Queensland Productivity Commission

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Primary Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

[Redacted]

# **CONTENTS**

## **Queensland Productivity Commission**

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

### **Part B**

## **CONCLUDING SUMMARY RESPONSE**

**to**

## **QUEENSLAND PRODUCTIVITY COMMISSION INQUIRY**

### **Part B (1)**

#### **About the Author**

(Extract from Initial Response)

**Pages 1 – 4**

### **Part B (2)**

#### **Brief overview of Initial Response**

(Summary of Interactions associated with Initial Response)

Refer to attached File F1 for copy of Initial Response.

**Page 5**

### **Part B (3)**

#### **Brief overview of Part A Response**

(Summary of associated interactions and Content Extract)

Phone Queensland Productivity Commission for copy of Part A Response. Ph: (07) 3035 3681.

**Pages 6 – 22**

### **Part B (4)**

#### **Brief overview of Part B Response**

#### **(CONCLUDING SUMMARY RESPONSE)**

Includes a summary of PPW interactions with some Part A Response Stakeholders.

**Pages 23 – 30**

## Part B (1)

# About the Author



Wayne Palmer

## Introduction to The PPW Group

### Registered Fire Systems Technical Designer

#### 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) Primary Objective –  
**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 19<sup>th</sup> 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 Request for Assistance **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 across 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 26<sup>th</sup> June 2020".

This discussion paper identified the "Registered Fire Systems Technical 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

Discipline

Occupations Covered

#### Design Profession

Fire Safety Design

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	<b>Fire Systems Design – fire and smoke systems</b>	2			Fire systems design work for fire and smoke control systems for building complexity levels 0-2 DTS only	Approved <b>diploma</b> of fire services design that includes the relevant units applicable to this category of work, with <b>approved NCC training, CN941 Diploma + M00 EB141 + M00 EB142.</b>	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.



## Part B (2)

# Brief overview of Initial Response

### Brief overview of Initial Response Index Section 1

**Our Interaction Reference:** PPW – TOR – Otipotcs – 001 sent Friday, 30 May 2025 at 8:59 pm submitted:

**Rfl1** Would the QPC please clarify if we can have an extension of time to have our say by submitting feedback.

**QPC Response:** Monday, 2 June 2025 2025 at 8:52 am reads:

You will be able to provide your submission on Tuesday, 3 June. However, if you still have any problems with the portal, you can send your submission to [enquiry@qpc.qld.au](mailto:enquiry@qpc.qld.au).

**Our Interaction Reference:** PPW – TOR – Otipotcs – 002 sent Monday, 02 June 2025 at 9:00 am reads:

A short note to say thank you for your prompt response and clarifications.

### Brief overview of Initial Response Index Section 2

**Our (Second) Interaction Reference:** PPW – TOR – Otipotcs – 002 sent Tuesday, 3 June 2025 1:10 PM submits NON-PROOFREAD publication titled "A Publication authored by the PPW Group in Response to Queensland Productivity Commission – OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR, and reads:

We have been advised by [REDACTED] that we can submit our response to your "OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR" by Email Transmission to this address.

In line with professional protocol, we have Cc'd a copy to [REDACTED]

**QPC Response:** Tuesday, 3 June 2025 at 1:19 pm reads:

Thank you for your submission. On behalf of QPC, I acknowledge receipt of your response.

### Brief overview of Initial Response Index Section 3

**Our Interaction Reference:** PPW – TOR – Otipotcs – 003 sent Tuesday, 10 June 2025 at 2:34 pm in part reads:

My office has carried out a more thorough proof read of our Response.

Please find attached a copy of our amended Response PPW-TOR-Otipotcs-Amdt 1 that includes a summary of the amendments on Pages 21 and 22. **(File F1)**

**Refer to attached for a copy of File F1.**

And

Submits:

**Rfl1** Would the QPC please clarify if the QPC have access to an **Appropriate Authority** (Building Certifier) Government Representative who is appropriately qualified and licensed to understand the contents of our response.

If yes to **Rfl1** then –

**Rfl2** Would the QPC please clarify if the QPC would be receptive to us meeting with the Government Representative to discuss the contents of our Response.

**QPC Response:** Wednesday, 11 June 2025 at 7:45 pm reads:

I will make sure your submission is updated and that the inquiry team has the new version.

Please can you direct your future emails to this inbox so the inquiry team can action, much appreciated.

## Part B (3)

# Brief overview of Part A Response

### Brief overview of Part A Response Index Section 4

**Our Interaction Reference:** PPW – TOR – Otipotcs – 004 sent Sunday, 22 June 2025 at 8:38 am in part reads:

Further to our **Rf11** that is contained in our Email Transmission – Interaction Reference: PPW – TOR – Otipotcs – 003 – Date: 10 June 2025 at 2:34 pm we submit our question **Rf11-Q1)** in lieu of **Rf12**.

**Rf11-Q1)** Could we please ask the QPC Enquiry Team to clarify if a meeting with a QPC Enquiry Team Representative who has access to an **Appropriate Authority** (Building Certifier) Government Representative who is appropriately qualified and licensed to understand the contents of our response and PPW can be co-ordinated ?

**QPC Response:** Monday, 23 June 2025 at 12:15 pm in part reads:

We have received a large number of submissions and due to the quantity of issues raised by stakeholders, the Commission will not be able to liaise with Government on all technical matters raised. Also please note that the Commission is not authorised to respond on behalf of Government to the specifics of the issues raised in your submission.

### Brief overview of Part A Response Index Section 5

**Our Interaction Reference:** PPW – TOR – Otipotcs – 005 sent Monday, 23 June 2025 at 11:11 pm in part reads:

It is unclear if a “face to face” meeting with a QPC Inquiry Team Representative can be co-ordinated.

You have **Written** –

**W1** We have received a large number of submissions and due to the quantity of issues raised by stakeholders, the Commission will not be able to liaise with Government on all technical matters raised.

**W2** Also please note that the Commission is not authorised to respond on behalf of Government to the specifics of the issues raised in your submission.

**W3** If you would still like to speak to a member of the Inquiry team, please let me know and confirm the best number.

### Response to W1

We would value the opportunity to meet “face to face” with a QPC Inquiry Team Representative to discuss **W1**.

### Response to W2

We would value the opportunity to meet “face to face” with a QPC Inquiry Team Representative to discuss **W2**.

### Response to W3

We would value the opportunity to meet “face to face” with a member of the inquiry team.

This can be co-ordinated by interacting via this email address.

**Rf11-Q2)** Could we please ask the QPC Inquiry Team to clarify if we could meet “face to face” with a member of the Inquiry Team.

## Part B (3)

### Brief overview of Part A Response

#### Brief overview of Part A Response Index Section 5 (CONINUED)

**QPC Response:** Wednesday, 25 June 2025 at 11:47 am reads:

I am happy to organise a time with one of our Inquiry team. Is an online face-to-face forum such as Teams amenable?  
If not, we can organise an alternative.

Please let me know some time windows during business hours that could work for you.

#### Brief overview of Part A Response Index Section 6

**Our Interaction Reference:** PPW – TOR – Otipotcs – 006 sent Wednesday, 25 June 2025 at 4:31 pm in part reads:

You have **Written** –

**W1** I am happy to organise a time with one of our Inquiry team.

**W2** Is an online face-to-face forum such as Teams amenable?

**W3** If not, we can organise an alternative.

**W4** Please let me know some time windows during business hours that could work for you.

#### Response to W1

Thank you.

#### Response to W2

I am a “face to face” in person type person.

A “face to face” in person meeting is preferred.

#### Response to W3

An alternative is preferred as per my **Response to W2**.

#### Response to W4

This opportunity to improve productivity of the Construction Sector is timely for The PPW Group (PPW).

PPW have made significant investments in the Construction Sector since National Legislative Regulation of the Australian Construction Sector was introduced during the late 1990's.

Our significant investments were elevated to serious investments when the Building Ministers' Forum commissioned the Shergold – Weir Report 22 February 2018 which **highlighted shortcomings in the implementation of the National Construction Code**. Refer to Section 1-E on Page 9 of our Response.

I am available to attend a “face to face” in person meeting at whatever time/date/location\*1 is convenient to your Queensland Productivity Commission Inquiry Team Representative.

\*1 Our Head Office is in Gympie, Queensland, so it is prudent that I qualify that my above offer to attend is based on the meeting place location being no more than four (4) hour's drive from Gympie.

**QPC Response:** Thursday, 26 June 2025 at 11:10 am reads:

Confirming that you would be happy to meet in Brisbane city please. That would be approximately a four hour round trip. If so, would you prefer beginning / middle / end of the day to accommodate that?

## Part B (3)

### Brief overview of Part A Response

#### Brief overview of Part A Response Index Section 7

Our Interaction Reference: PPW – TOR – Otipotcs – 007 sent Thursday, 26 June 2025 at 7:35 pm in part reads:

I confirm my attendance in Brisbane city.

Given the three (3) options, I would prefer the “middle” of the day option.

QPC Response: Friday, 27 June 2025 at 8:16 am reads:

Are you available for 11 am Monday 7 July at [REDACTED] please?

#### Brief overview of Part A Response Index Section 8

Our Interaction Reference: PPW – TOR – Otipotcs – 008 sent Friday, 27 June 2025 at 11:39 am in part reads:

I confirm my availability for 11am, Monday 7 July at [REDACTED]

QPC Response: Friday, 27 June 2025 at 2:30 pm reads:

I will register your details with the building and a staff member will collect you from the ground floor.

#### Brief overview of Part A Response Index Section 9

Sine Group Pty Ltd: Thursday, 3 July 2025 11:29 am reads:

Our Interaction Reference: PPW – TOR – Otipotcs – 009 sent Friday, 4 July 2025 at 8:31 am in part reads:

Below is our PPW Meeting Agenda which is provided in an endeavour to maximise the Meeting outcomes.

#### PPW Meeting Agenda

- 1 Table a copy of our Part A Submission titled “SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT AND FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS”.
- 2 Provide a brief overview of the “SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT” aspect of our Part A Submission.
- 3 Provide a brief overview of the “FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS” aspect of our Part A Submission.
- 4 Seek QPC assistance to clarify the content of the “key dates 4 Interim Report release July 2025”.
- 5 Seek QPC assistance to clarify the meaning of the “key dates 5 Further stakeholder consultation July 2025”.
- 6 Seek QPC assistance to clarify the meaning of the “key dates 6 Due date for submission August 2025”.
- 7 Seek QPC assistance to clarify the content of the “key dates 7 Final Report 24<sup>th</sup> October 2025”.
- 8 Subject to the outcomes of 4 to 7 seek QPC assistance to clarify who QPC will engage to understand the content of PPW Submissions. ie Australian Building Codes Board (ABCB) have the Building Codes Committee (BCC) which is the ABCB Technical Advisory Group. However, the ABCB – BCC does **NOT** include a National Construction Code – Volume 1 (NCC – V1) **Appropriate Authority** recognised NCC – V1 AS(/NZS)1668 Mechanical Ventilation Other **Appropriately Qualified Person** Design Certifier member that was required to understand the PPW Submission.

QPC Response: Monday, 7 July 2025 at 8:06 am reads:

Confirmation of receipt.

## Part B (3)

# Brief overview of Part A Response

### Brief overview of Part A Response Index 10

Sine Group Pty Ltd: Monday, 7 July 2025 10:41 am reads:

Welcome to [REDACTED] Here's a copy of your pass.

Sine Group Pty Ltd: Monday, 7 July 2025 10:45 am reads:

A friendly reminder that [REDACTED] has invited you to [REDACTED]

**Start time:** Monday 7 July 2025 at 11:00 am

**End time:** Monday, 7 July 2025 at 12:00 pm

A PUBLIC ACCESS hard copy of our fifteen (15) SECTION Part A Response document was tabled at the QPC 11:00AM - 12:00 Noon Monday 07.07.25 [REDACTED] Brisbane City, Meeting.

**Contact Queensland Productivity Commission [REDACTED] for a PUBLIC ACCESS copy of our fifteen (15) SECTION Part A Response document.**

**Refer to Pages 10 to 15 for a copy of an extract of the *CONTENTS* of our fifteen (15) SECTION Part A Response document that provides a brief overview of the contents of the Part A Response document.**

**SECTION fifteen (15) contains a copy of the Author's CN941 Diploma.**

**THE NON-NATIONAL RECOGNITION OF THE NATIONALLY RECOGNISED CN941 DIPLOMA IS CONSIDERED TO BE A NATIONAL FIRE SAFETY CONCERN WHICH IS AN UNCONCLUDED MATTER (UM) THE FORMS PART OF Part B (4).**

**Our Interaction Reference:** PPW – TOR – Otipotcs – 010 sent Monday, 7 July 2025 at 9:02 pm in part reads:

I will firstly address the PPW Agenda Topic Outcome (PPW ATO) and then address other matters not listed on the PPW Agenda as part of a separate Email Transmission after **MU1** to **MU8** are QPC accepted or corrected, if applicable.

### My Understanding of the PPW ATO

**MU1 of PPW ATO1** I tabled our Part A Submission and it was accepted by QPC.

**MU2 of PPW ATO2** I did not provide a brief overview of the "SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT" because the Inquiry Assessment Team does NOT include a NCC – V1 **Appropriate Authority** recognised **Appropriately Qualified Person** who is required in order to understand our Primary Response. Refer to Pages 13, 14 and 15 of our Primary Response for the legislative meaning of **Appropriate Authority** recognised **Appropriately Qualified Person**.

**MU3 of PPW ATO3** I did not provide a brief overview of the "FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS" also because the Inquiry Assessment Team does NOT include a NCC – V1 **Appropriate Authority** recognised **Appropriately Qualified Person** who is required in order to understand our Primary Response. Refer to Pages 13, 14 and 15 of our Primary Response for the legislative meaning of **Appropriate Authority** recognised **Appropriately Qualified Person**.

**MU4 of PPW ATO4** QPC advised that the "Interim Report released July 2025" is intended to be released this week.

**MU5 of PPW ATO5** QPC clarified that today's meeting was PPW's "Further stakeholder consultation July 2025".

**MU6 of PPW ATO6** I understand that the "Due date for submissions August 2025" does NOT refer to post "Further stakeholder consultation July 2025" stakeholder submissions. ie NO stakeholder can make a further submission after the "Further stakeholder consultation July 2025".

**MU7 of PPW ATO7** I understand that the "Final Report 24<sup>th</sup> October 2025" is the target date for the QPC "Final Report".

**MU8 of PPW ATO8** I endeavoured to highlight that a NCC – V1 **Appropriate Authority** recognised **Appropriately Qualified Person** as explained against **MU2** and **MU3** is to be engaged as a member of the QPC Inquiry Assessment Team, in order for the QPC to understand that a COMPLIANT APPROVED DESIGN of building work in the CONSTRUCTION SECTOR is the starting point for "IMPROVED PRODUCTIVITY OF THE CONSTRUCTION SECTOR".

I await QPC acceptance or correction, if applicable, of **MU1** to **MU8**.

**Refer to Page 15 for continuation of Brief overview of Part A Response Index 10**

## Part B (3)

# Brief overview of Part A Response



Our File Reference: PPW – TOR – Otipotcs.

File Opened: Friday, 30 May 2025 9:00 PM.

File Closed:

## Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

### Part A

**SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT  
AND  
FIVE (5) PPW PUBLIC LIBRARY EXTRACTS  
OF  
SUBMISSIONS  
REGARDING  
NATIONAL NON-COMPLIANCE CONCERNS**



Queensland Productivity Commission

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Primary Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

[Redacted]



# **CONTENTS**

## **Queensland Productivity Commission**

### **OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR**

## **Part A**

### **SECTION 1**

**Australian Government – Australian Building Codes Board (ABCB) 22.09.24**

**RfI1** (Request for Information 1) Could we please ask ABCB to clarify if the ABCB consider this **NATIONAL FIRE SAFETY CONCERN** No 1 should be considered to be a **SERIOUS NATIONAL FIRE CONCERN** by the people of Australia.

### **SECTION 2**

**Federal Government – The Honourable Minister Ed Husic Building Ministers’ Meeting Chair + Twenty One (21) Stakeholders 24.10.23**

**RfAdv 004** (Request for Advice 1) PPW seeks advice from the BMM (Chair – Commonwealth Government, State Government Attendees and Territory Government Attendees) to clarify if they have access to National Construction Code 2019 – Volume 1 – PART A5 – AS1668 Air Handling Systems – Appropriately Qualified Person\*1 who understands that a Professional Prescriptive Engineer\*4 who has been issued a CN941 Diploma of Engineering (Refrigeration and Air Conditioning) and ESSENTIAL Award Elements M00 EB141 Air Conditioning – (AS1668 Air Handling Systems) codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) design is person reasonably available who holds an accreditation to perform the following regulated work under the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation):

b. *the endorsement of plans and specifications for relevant fire safety systems, being a ducted smoke control system only, under clauses 136AA and 146B,...*

### **SECTION 3**

**Queensland Government – QFaES Chief Superintendent Mark Kahler 27.10.24**

**RfM1** (Request for Meeting 1) Could we please ask if you are receptive to co-ordinating a meeting to discuss obtaining copies of the QFaES **decision notices** as per Section **M5 C** (b) on Page iv of the attached.

### **SECTION 4**

**Queensland Government – The Honourable Minister Samuel O’Connor Queensland Attendee Building Ministers’ Meeting 27.11.24**

**RfA1** (Request for Assistance 1) Would the Honourable Minister please assist us by providing us with the email contact details of the person in your department who works with the QFD to jointly administer the Queensland Regulatory Fire Safety Framework of Legislation.

## SECTION 5

**Queensland Government – Gympie Local LNP Member Tony Perrett 02.07.24**

**Technical Matter Reference:** QLNP – **FSC** – **C5** – PartC001: **NATIONAL FIRE SAFETY CONCERN** that is associated with non **NATIONAL** recognition of the CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions M00 EB141 Air Conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) designs, that are recognised within the Australian Qualifications Framework.

## SECTION 6

**Queensland Government – The Honourable Premier Steven Miles; the Honourable Minister de Brinni Queensland Attendee Building Ministers’ Meeting; LNP Leader of Opposition David Crisafulli and Gympie Local LNP Member Tony Perrett 23.01.24**

**Q1)** (Question 1) Could we please ask that you confirm that you have been made aware of the above Technical Matter: **NATIONAL FIRE SAFETY CONCERN** ?

Reproduction of the above Technical Matter mentioned in **Q1)** –

Technical Matter: **NATIONAL FIRE SAFETY CONCERN** that is associated with **NON – NATIONAL** recognition of the Queensland Logan TAFE CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions and M00 EB141 Air Conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) designs, that are recognised within the Australian Qualifications Framework.

## SECTION 7

**Queensland Local Government – Townsville City Council – Technical Officer Alfio Romeo 24.04.25**

**Rf11** (Request for Information 1) Could we please ask that you clarify if you are the appropriate TCC **QldFSCS – 35** Contact and if not, then could we please ask that you email us the email contact details of the appropriate TCC **QldFSCS – 35** Contact.

## SECTION 8

**Queensland Local Government – Rockhampton Regional Council – Senior Building Certifier Representative 28.10.24**

**Rf12** (Request for Information 2) Would RCC please clarify RCC’s usual lead time for an appropriate person to read incoming correspondence.

## SECTION 9

**Queensland Local Government – Gympie Regional Council – Mayor Hartwig 26.10.24**

**Rf11** (Request for Information 1) Would you please provide us with assistance to clarify the current process for gaining access to the Gympie Regional Council – Competent Persons Register.

## SECTION 10

**Standards Australia – The PPW Group – PPW – AS1668 Air Handling Systems Designs – DR AS 1668.2:2023 – Public Comments Submission – Complaint – Head of Standards Development Richard Lambert 29.06.25**

**Rf13 (Request for Information 3)** Would you please confirm that Standards Australia does NOT object to PPW including a copy of "The PPW Group - PPW - AS1668 Air Handling Systems Designs - DR AS 1668.2:2023 - Public Comment Submission" in our bound publication submission to the abovementioned Queensland Productivity Commission Meeting.

## SECTION 11

**Australian Building Codes Board – BCR Implementation Team – Discussion Paper on BCR recommendation 19 – August 2021 – PPW Response 671562782 26.09.21**

**Question on Page 30 of 33** We would ask that BCR Implementation Team engage with is, in writing (email), to clarify their position regarding the above recommendation.

Above recommendation referred to in **Question on Page 30 of 33** is reproduced below.

It is recommended that independent commissioning/testing be undertaken in accordance with the Standards Australia Commissioning Standard.

With regard to NCC – V1 AS1668 Air Handling Systems that are **Fire Safety Systems** we recommend that an independent NCC – V1 AS1668 Air Handling Systems – **Fire Safety Systems** – Appropriately Qualified Person be engaged for testing and Declaration of Installation Compliance, given that the CN941 Diploma and M00 EB141 and M00 EB142 academic competency recognitions are recognised in all States and Territories.

## SECTION 12

**New South Wales Government – Regulatory Impact Statement – Design and Building Practitioners Regulation 2020 – November 2020 – PPW Response 11.01.21 Minister for Better Regulation and Innovation Kevin Anderson MP**

**Q1) (Question 1)** PPW asks the Honourable Minister Kevin Anderson MP if he would provide PPW with the contact details of the NSW Representative who is **responsible for recognising the qualifications of their class of NCC – V1 – Clause A 2.2 – AS1668 Air Handling Systems – Appropriately Qualified Persons** ?

**Q2) (Question 2)** PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree with the above **4B-C** PPW understanding ?

Refer to Page 5 of our Response for our **4B-C** PPW understanding.

This **Q2)** refers to clarifying if the NSW Government recognise the Queensland Logan TAFE CN941 Diploma.

**Q3) (Question 3)** PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government is proposing **4C-A** (ii) and (iii) ?

Refer to Page 6 of our Response for **4C-A** (ii) and (iii) information.

Refer also to **4F** on Page 11.

This **Q3)**, in part, refers to clarifying if the NSW Government has access to a NCC – V1 **Appropriately Qualified Person** who understands NCC – V1 AS(/NZS) 1668 Mechanical Ventilation Design Certification.

## SECTION 12 (CONTINUED)

**Q4)** (Question 4) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government is aware of **4D-B** above.

Refer to Page 7 of our Response for **4D-B** information.

This **Q4)** refers to clarifying if the NSW Government recognise the Queensland Logan TAFE CN941 Diploma.

**Q5)** (Question 5) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree that all registered certifiers and principal certifiers should be notified of the **4E-B** above class of appropriate person ?

Refer to Page 10 of our Response for **4E-B** information. Page 10 **4E-D** refers to “a copy of the Authors CN941 Diploma” which is filed in Section 15.

This **Q5)**, in part, refers to clarifying if the NSW Government understand a principal certifier is required to be a NCC – V1 **Appropriate Authority** who has NO statutory responsibility under the NSW NCC – V1 legislation.

**Q6)** (Question 6) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government agree **4F-D** above constitutes a **NATIONAL FIRE SAFETY CONCERN** ?

Refer to Page 13 of our Response for **4F-D** information.

**Q7)** (Question 7) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assistance Team to clarify in writing if the NSW Government agree this **4G-C** clarification constitutes a **NATIONAL FIRE SAFETY CONCERN** ?

Refer to Page 1 Section **1A** of our Response for the **Q7) 4G-C** information.

**Q8)** (Question 8) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Building and Development Certifiers Act 2018 No 63 to recognise or register a NSW NCC – V1 Clause A 2.2 AS1668 Air Handling Systems – Fire Safety Systems – Appropriately Qualified Person ?

**Q9)** (Question 9) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Environmental Planning and Assessment Act 1979 No 203 to recognise or register a NSW NCC – V1 Clause A 2.2 AS1668 Air Handling Systems – Fire Safety Systems – Appropriately Qualified Person ?

**Q10)** (Question 10) PPW seek the assistance of the RIS D&BPR 2020 – November 2020 Response Assessment Team to clarify in writing if the NSW Government has a provision under the Design and Building Practitioners Act 2020 No 7 to recognise or register a NSW Clause A 2.2 AS1668 Air Handling System – Fire Safety Systems – Appropriately Qualified Person ?

## SECTION 13

Refer to Page 9 of our Stakeholder Feedback for a “Brief Overview of my experience in the field of AS1668 Air Handling Systems”.

We have worked through the weekend, and it is now late Sunday 06.07.25 and we are out of time to provide further information to this QPC process prior to our [REDACTED] Meeting.

## SECTION 14

This "Response to Artibus Public Comment and Online Survey" contains information that highlights that it could be concluded that the non-national recognition of the Queensland Logan TAFE CN941 Diploma and ESSENTIAL Award Elements is a **NATIONAL FIRE SAFETY CONCERN**.

We have worked through the weekend, and it is now late Sunday 06.07.25 and we are out of time to provide further information to this QPC process prior to our [REDACTED]

### Part B (3)

## Brief overview of Part A Response

### Brief overview of Part A Response Index 10 (CONTINUED)

**QPC Response:** Wednesday, 9 July 2025 at 9:54 am reads:

Acknowledging receipt of email. Due to workload, [REDACTED] will come back with confirmation later this week or early next week

**QPC Response:** Friday, 11 July 2025 at 4:17 pm in part reads:

As noted during the discussion, it will not be possible to have an appropriately qualified person (as outlined in your email) to assess your submission.

In terms of timing, the interim report will be released before the end of July (we will notify anyone who has registered their interest on our website). We will be consulting on matters raised in the interim report during August and September and will be seeking further submissions from stakeholders on these matters.

**Our Interaction Reference:** PPW – TOR – Otipotcs – 010 Part A – 001 sent Monday, 14 July 2025 at 7:01 am in part reads:

It is unclear if QPC agree with **MU1** to **MU8**.

We will put this aspect of our interactions on HOLD.

Our Interaction Reference: PPW – TOR – Otipotcs – 012, to follow, will address an aspect of Our Interaction Reference: PPW – TOR – Otipotcs – 010, below, that reads –

*...and then address other matters not listed on the PPW Agenda as part of a separate Email Transmission...*

### Brief overview of Part A Response Index 11

**QPC Email:** Thursday, 10 July 2025 at 9:34 am in part reads:

I am following up on your submission to the Construction Productivity inquiry to confirm your publication preferences for our website please.

Can you please confirm if you consent to:

1. have your organisation name and submission published on our website with personal information, signatures and potentially defamatory information redacted?

or

2. have your organisation name only published on our website

**Our Interaction Reference:** PPW – TOR – Otipotcs – 011 sent Thursday, 10 July 2025 10:20 PM in part reads:

Please use this Email Transmission as confirmation to have our organisation name and submission published on (y)our website with personal information, signatures and potentially defamatory information redacted?

**QPC Response:** Friday, 11 July 2025 at 11:06 am reads:

Noted, thank you Wayne.



## Part B (3)

### Brief overview of Part A Response

Brief overview of Part A Response Index 12

Our Interaction Reference: PPW – TOR – Otipotcs – 012 and attachment sent Monday, 14 July 2025 4:55 pm is reproduced below.



Our File Reference: PPW – TOR – Otipotcs.

Our Interaction Reference: PPW – TOR – Otipotcs – 012.

Your Reference: Email sent Friday, 11 July 2025 at 4:17 pm.

[REDACTED]  
 The Inquiry Team,  
 Queensland Productivity Commission (QPC),  
 Email: [enquiry@qpc.qld.gov.au](mailto:enquiry@qpc.qld.gov.au) .  
 [REDACTED]

Dear [REDACTED]

Further to our Email Transmission of earlier today, Our Interaction Reference: PPW – TOR – Otipotcs – 010 – Part A – 001, I will address **Matter 1 (M1)** that was raised by QPC during our (PPW/QPC) 07.07.03 Meeting (The Meeting).

#### Preamble to addressing M1 that was raised by QPC during The Meeting

**M1** is that I recall that after clarifying that the Inquiry Assessment Team (IAT) did not include an **Appropriate Authority** recognised **Appropriately Qualified Person** which is explained on Pages 13 to 15 of our Response Amendment 1 (RA1) and highlighted by the **"SPECIAL NOTE"** at the bottom of Page 15, QDC sought my assistance to summarise my twenty-two (22) page response into a couple of sentences.

I further recall that [REDACTED] recorded my couple of sentences summary in their notes.

It would be helpful if QPC would email me a copy of these sections of [REDACTED] notes.

At the opening of The Meeting, I tabled our publication titled "Part A – SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT AND FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS" (Part A).

Upon reflection of The Meeting, QPC seeking my assistance to summarise my twenty-two (22) page RA1 into a couple of sentences and in the interest of using this opportunity to SIMPLIFY a message to PEOPLE AT ALL LEVELS IN AUSTRALIA, it should be productive for this Inquiry, to reduce my couple of sentences provided during The Meeting to a SINGLE NATIONAL FIRE SAFETY CONCERN that is referred to in Section 2 of our Part A publication that was tabled at The Meeting and reproduced below for convenience –

Technical File Reference: BMM – **FSC** – C5 – PartC001: **NATIONAL FIRE SAFETY CONCERN** that is associated with non NATIONAL recognition of the CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions M00 EB141 Air Conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) – designs, that are recognised within the Australian Qualifications Framework.



**SPECIAL NOTE !**

PLEASE REFER TO SECTION 15 OF OUR Part A PUBLICATION FOR A COPY OF MY CN941 QUALIFICATION.

I have attached one (1) of six (6) attachments to Section 2 of our Part A publication which confirms that this **NATIONAL FIRE SAFETY CONCERN** has been ignored by the then Honourable Minister Karen Andrews – Chair of the then Building Ministers’ Forum (27.11.2020), the then Honourable Minister Ed Husic – Chair of the now Building Ministers’ Meeting (06.11.2022) and subject to the outcome of this QPC Inquiry the Current Chair of the Building Ministers’ Meeting Judith Blake MAY take this **NATIONAL FIRE SAFETY CONCERN** more seriously.

Further, the QPC has been directed to investigate and report on:

- 4 factors shaping Queensland’s productivity performance including commonwealth, state and local government legislation and regulation, industry 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
- 6 priority areas for reform for the Queensland Government to effectively 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 subcontractors 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

Refer to Page 4 of our RA1 for reference to dot points 4, 5, 6 and 11.

Our above revised **M1 NATIONAL FIRE SAFETY CONCERN** relates to ALL the above underlined sections of dot points 4, 5, 6 and 11 regarding correcting the existing NON-COMPLIANT National Construction Code – Volume 1 AS(/NZS)1668 Mechanical Ventilation **Approved Designs**.

**The purpose of this Email Transmission**

The Purpose (P) of this Email Transmission is –

**P1** To clarify if QPC can email me a copy of [REDACTED] notes that record my abovementioned couple of sentences summary.

**P2** To clarify if my couple of sentences summary can be replaced with the above revised **M1 NATIONAL FIRE SAFETY CONCERN** which is the PRIMARY IMPROVEMENT required to address the above RA1 Page 4 underlined sections of dot points 4, 5, 6 and 11 regarding correcting the existing NON-COMPLIANT National Construction Code – Volume 1 AS(/NZS)1668 Mechanical Ventilation **Approved Designs**.

**P3** To clarify if QPC will confirm that my RA1 will be amended to include a PPW/QPC agreement to include a summary statement, yet to be PPW developed and QPC approved to be included in our RA2 to be publicly available to PEOPLE AT ALL LEVELS IN AUSTRALIA and included in this month’s QPC Interim Report.

Please email me if any aspect of this Email Transmission requires clarification.

I wait QPC thoughts regarding **P1** to **P3**.

Kind Regards,

Mr. L. W. (Wayne) Palmer

Engineering Manager (Dip.Eng.407919)

Phone: 0411 075 156

Email: [engineering@ppwgroup.com.au](mailto:engineering@ppwgroup.com.au)

• PPW AS1668 Air Handling Systems Designs

• PPW Dustech Engineering

• PPW Fan Engineering

• PPW Palm Sheet Metal Works

• PPW Natural Draft Ventilation

The attachment to this **Our Interaction Reference: PPW – TOR – Otipotcs – 012** is **File F2**.

**Refer to attached for a copy of File F2.**

**Our Interaction Reference: PPW – TOR – Otipotcs – 012 - 001** sent Tuesday, 15 July 2025 4:23 am in part reads; Further to Our Interaction Reference: PPW – TOR – Otipotcs – 012 sent 4:55 pm yesterday please correct the typo at the bottom of Page 1 that reads; *...the then Honourable Minister Ed Husic – Chair of the now Building Ministers’ Meeting (06.11.2020)...* to read **(06.11.2022)**.

## Part B (3)

### Brief overview of Part A Response

#### Brief overview of Part A Response Index 12 (CONTINUED)

**QPC Response:** Wednesday, 16 July 2025 at 7:56 am reads:

An email to acknowledge confirmation of receipt; please be patient with our response time. Thank you.

#### Brief overview of Part A Response Index 13

Reproduced below is a copy of **Our Interaction Reference:** PPW – TOR – Otipotcs – 013 sent Sunday, 20 July 2025 2:28 PM and **QPC Response:** Tuesday, 22 July 2025 at 12:31 pm.

**From:** QPC <enquiry@qpc.qld.gov.au>

**Date:** Tuesday, 22 July 2025 at 12:31 pm

**To:** LloydWayne Palmer [REDACTED] QPC <enquiry@qpc.qld.gov.au>

**Subject:** Re: [EXTERNAL] PPW Understanding of Complexities (UoC) that are associated with the Terms of Reference (ToR) that QPC have been directed to investigate and Matter 2 (M2).

OFFICIAL

Dear Wayne,

Thank you for your emails of 14 and 20 July 2025.

In our in-person meeting of [REDACTED] we noted that the terms of reference of the inquiry is broad, and that the QPC will be unable to look into individual and specific (including technical) matters raised by stakeholders.

It is unlikely we will be able to further consider the issue you have raised, in any great detail, as part of this Inquiry and we suggest you further direct your queries to the Department of Housing and Public Works as the administering authority of licensing and building codes in Queensland.

Kind regards,

[REDACTED]



#### Queensland Productivity Commission

**P:** 07 3522 8469

**E:** enquiry@qpc.qld.gov.au

[qpc.qld.gov.au](http://qpc.qld.gov.au)



From: LloydWayne Palmer [REDACTED]

Sent: Sunday, 20 July 2025 2:28 PM

To: QPC <enquiry@qpc.qld.gov.au>

Subject: [EXTERNAL] PPW Understanding of Complexities (UoC) that are associated with the Terms of Reference (ToR) that QPC have been directed to investigate and Matter 2 (M2).

**CAUTION: This email originated from outside Queensland Treasury. Do not click links or open attachments unless you recognise the sender and know the content is safe.**



Our File Reference: PPW – TOR – Otipotcs.

Our Interaction Reference: PPW – TOR – Otipotcs – 013.

Your Reference: Not Applicable/New Interaction.

Host of [REDACTED] Meeting,  
The Inquiry Team,  
Queensland Productivity Commission (QPC),  
Email: [enquiry@qpc.qld.gov.au](mailto:enquiry@qpc.qld.gov.au) .  
[REDACTED]

Dear [REDACTED]

This Section 13 of Our File Reference: PPW – TOR – Otipotcs is intended to provide some PPW Understanding of Complexities (UoC) that are associated with the Terms of Reference (ToR) that QPC have been directed to investigate.

This PPW UoC relates to some of the National/Commonwealth/State/Local Government Legislative Regulatory Framework for regulating AS(/NZS)1668 Mechanical Ventilation Codes and Regulations.

We will firstly summarise some relevant aspects of the ToR that QPC have been directed to investigate, then provide an Example of Complexity (EoC) in the form of a Question (Q) for each aspect of the ToR that QPC have been directed to investigate and then address Matter 2 (M2).

**SPECIAL NOTE !**

**WE ITERATE THAT IT WILL BE NECESSARY FOR THE QPC INQUIRY ASSESSMENT TEAM TO ENGAGE THE SERVICES OF A NATIONAL CONSTRUCTION CODE – VOLUME 1 APPROPRIATE AUTHORITY RECOGNISED AS(/NZS)1668 MECHANICAL VENTILATION OTHER APPROPRIATELY QUALIFIED PERSON DESIGN CERTIFIER IN ORDER TO INVESTIGATE THESE ASPECTS OF THE ToR.**

**Some aspect(s) of the ToR that QPC have been directed to investigate**

Below is a summary of ToR dot points 4 to 6 and 11 Aspect(s) (A) –

- |                      |  |
|----------------------|--|
| ToR dot point 4-A(a) | Commonwealth government legislation and regulation                               |
| ToR dot point 4-A(b) | State government legislation and regulation                                      |
| ToR dot point 4-A(c) | Local government legislation and regulation                                      |
| ToR dot point 4-A(d) | Procurement policies   |
| ToR dot point 4-A(e) | Opportunities for improvement  |
| ToR dot point 5-A(a) | Opportunities for improvement in productivity in Queensland including regulatory |
| ToR dot point 6-A(a) | Queensland Government to effectively address short term skills availability      |
| ToR dot point 6-A(b) | Queensland Government to effectively address medium term skills availability     |
| ToR dot point 6-A(c) | Queensland Government to effectively address long term skills availability       |
| ToR dot point 6-A(d) | Queensland Government to effectively address short term market competition       |
| ToR dot point 6-A(e) | Queensland Government to effectively address medium term market competition      |

ToR dot point 6-A(f)	Queensland Government to effectively address long term market competition
ToR dot point 6-A(g)	Queensland Government to effectively address short term availability of suitably qualified subcontractors
ToR dot point 6-A(h)	Queensland Government to effectively address medium term availability of suitably qualified subcontractors
ToR dot point 6-A(i)	Queensland Government to effectively address long term availability of suitably qualified subcontractors
ToR dot point 11-A(a)	How Government procurement and contracting arrangements can be improved
ToR dot point 11-A(b)	How Government Best Practice Industry Conditions can be improved
ToR dot point 11-A(c)	How Government affect productivity in the construction sector can be improved
ToR dot point 11-A(d)	How practices and policy settings can be improved

#### **Example of Complexity (EoC) of each aspect of the ToR that QPC have been directed to investigate**

**ToR dot point 4-A(a) EoC1 –**

**Q1)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to clarify if Commonwealth government legislation and regulation means the Prime Minister and the Senior Ministers who make up the Cabinet legislation and regulation ?

**ToR dot point 4-A(b) EoC2 –**

**Q2)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to clarify if Australian Capital Territory legislation and regulation and Northern Territory legislation and regulation are excluded from this ToR aspect ?

**ToR dot point 4-A(c) EoC3 –**

**Q3)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the **Fire Safety System Concerns** aspects that are associated with STANDARD 3.2.3 FOOD PREMISES AND EQUIPMENT – February 2023 – Section 7 Ventilation ?

Refer attached file RFSTD and LFSI CN941 Diploma.

**ToR dot point 4-A(d) EoC4 –**

**Q4)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A – SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT AND FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS”.

**ToR dot point 4-A(e) EoC5 –**

**Q5)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand contents of the PPW publication titled “Part A – SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT AND FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS”. The contents of the “Part A” publication is a SNAP SHOT of questions that MUST be addressed in order to address “Opportunities for improvement”.

**ToR dot point 5-A(a) EoC6 –**

**Q6)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand contents of the PPW publication titled “Part A – SOME UNCONCLUDED EMAIL TRANSMISSIONS WITH THREE (3) LEVELS OF GOVERNMENT AND FIVE (5) PPW PUBLIC LIBRARY EXTRACTS OF SUBMISSIONS REGARDING NATIONAL NON-COMPLIANCE CONCERNS” (“Part A”). The contents of the “Part A” publication is a SNAP SHOT of questions that MUST be addressed by this QPC Inquiry in order to address “Opportunities for improvement in productivity in Queensland including regulatory”.

**ToR dot point 6-A(a) EoC7 –**

**Q7)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of this “short term skills availability”.

**ToR dot point 6-A(b) EoC8 –**

**Q8)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of this “medium term skills availability”.



**ToR dot point 6-A(c) EoC9 –**

**Q9)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of this “long term skills availability”.

**ToR dot point 6-A(d) EoC10 –**

**Q10)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A” that addresses a fix for part of this “short term market competition”.

**ToR dot point 6-A(e) EoC11 –**

**Q11)** Does the QPC Inquiry Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A” that addresses a fix for part of this “medium term market competition”.

**ToR dot point 6-A(f) EoC12 –**

**Q12)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A” that addresses a fix for part of this “long term market competition”.

**ToR dot point 6-A(g) EoC13 –**

**Q13)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of effectively addressing “short term availability of suitably qualified subcontractors”.

**ToR dot point 6-A(h) EoC14 –**

**Q14)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of effectively addressing “medium term availability of suitably qualified subcontractors”.

**ToR dot point 6-A(i) EoC15 –**

**Q15)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of Section 14 of the PPW publication “Part A”, which relates to “Technical File Reference: BMM – **FSC** – C5 – PartC001:” contained in Our Interaction Reference: PPW – TOR – Otipotcs – 12 sent Monday, 14 July 2025 at 4:55 pm that addresses a fix for part of effectively addressing “long term availability of suitably qualified subcontractors”.

**ToR dot point 11-A(a) EoC16 –**

**Q16)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A” that addresses a fix for part of this “How Government procurement and contracting arrangements can be improved”.

**ToR dot point 11-A(b) EoC17 –**

**Q17)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTION 3 of the PPW publication titled “Part A” that addresses a fix for part of this “How Government Best Practice Industry Conditions can be improved”.

**ToR dot point 11-A(c) EoC18 –**

**Q18)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand SECTIONS 3, 4, 5 and 6 of the PPW publication titled “Part A” that addresses a fix for part of this “How Government affect productivity in the construction sector can be improved”.

**ToR dot point 11-A(d) EoC19 –**

**Q19)** Does the QPC Inquiry Assessment Team include a Team Member who is appropriately qualified to understand the contents of the PPW publication “Part A” that addresses a fix for part of this “How practices and policy settings can be improved”.

#### **Summary Conclusion to EoC1-Q1) to EoC19-Q19) Questions**

Subject to the QPC Inquiry Assessment Team answers to **EoC1-Q1) to EoC19-Q19)** it is understood that a National Technical Advisory Group (NTAG) to consist of a National Construction Code – Volume 1 (NCC-V1) **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier from each State and Territory be established to address **ToR dot point 4-A(a) to ToR dot point 11-A(d)**.

## Preamble to M2

Where to from here ?

PPW have engaged with Peak Industry Bodies like the Building Minister's Meeting (previously Building Ministers' Forum), Australian Building Codes Board (ABCB), ABCB-Building Codes Committee (BCC) members, ABCB-Building Confidence Report Implementation Team, Standards Australia, Fire Protection Association Australia, etc, and the resultant outcome appears to be that they are NOT aware that a NCC-V1 AS(/NZS)1668 Air Handling System Installation – Fire Safety System Installation is a NCC-V1 AS(/NZS)1668 Mechanical Ventilation Installation – Fire Safety System Installation (Refer PPW publication "Part A" Section 1) and they are NOT aware of the Queensland Logan TAFE CN941 Diploma and ESSENTIAL Award Elements M00 EB141 and M00 EB142 (Refer PPW publication "Part A" Section 2).

It is understood that Judith Blake has been recently appointed the interim CEO of the ABCB Office and Chair of the Building Minister's Meeting (BMM). Refer to Stakeholder **S6** of both PPW publication "Part A" Section 2 Email to BMM Chair Honourable Ed Husic and attachment.

**M2** Subject to the QPC Inquiry Assessment Team answers to **EoC1-Q1** to **EoC19-Q19**), PPW suggest that Judith Blake in her positions of interim CEO of the ABCB Office and Chair of the BMM be approached to co-ordinate the establishment of the abovementioned NTAG to consist of a National Construction Code – Volume 1 (NCC-V1) **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier from each State and Territory to address the abovementioned ToR.

## Preamble to M2 – Request for Information 1 (Rf11)

Subject to the QPC Inquiry Assessment Team answers to **EoC1-Q1** to **EoC19-Q19**), PPW offer to approach Judith Blake in her positions of interim CEO of the ABCB Office and Chair of the BMM to co-ordinate the establishment of the abovementioned NTAG to consist of a NCC-V1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier from each State and Territory to address the abovementioned ToR.

**M2 – Rf11** Would the QPC Inquiry Assessment Team consider the abovementioned PPW offer that PPW approach Judith Blake in her positions of interim CEO of the ABCB Office and Chair of the BMM to co-ordinate the establishment of the abovementioned NTAG to consist of a NCC-V1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier from each State and Territory to address the abovementioned ToR.

Please email the undersigned if any aspect of this Email Transmission requires clarification.

We await QPC response to **EoC1-Q1** to **EoC19-Q19**) and **M2 – Rf11**.

Kind Regards,

Mr. L. W. (Wayne) Palmer

Engineering Manager (Dip.Eng.407919)

Phone: 0411 075 156

Email: [engineering@ppwgroup.com.au](mailto:engineering@ppwgroup.com.au)

• PPW AS1668 Air Handling Systems Designs

• PPW Dustech Engineering

• PPW Fan Engineering

• PPW Palm Sheet Metal Works

• PPW Natural Draft Ventilation



## Part B (4)

# CONCLUDING SUMMARY RESPONSE

### Explanation of our Part B CONCLUDING SUMMARY RESPONSE

This Part B (4) CONCLUDING SUMMARY RESPONSE brings together four (4) Parts of our responses to date. Refer to *CONTENTS* Page I for an explanation of the four (4) Parts.

### Summary of Un-concluded Matters (UM) with some Part A Response Stakeholders

#### SECTION 1

Our Interaction Reference: PPW – TOR – Otipotcs – Part A – Section 1 – **UM4**\*1 – PPW – ABCB – National Fire Safety Concern 1 – 001 – 001 sent Thursday, 7 August 2025 at 11:11 am.

\*1 **UM4** means **Un-concluded Matter No.4**.

To: Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)]

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)]

[REDACTED]

Cc:

Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]

Standards Australia Program Manager Sarah Merson [Stakeholder (**S40**)]

[REDACTED]

Honourable Premier David Crisafulli [Stakeholder (**S18**)]

[REDACTED]

Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)]

[REDACTED]

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)]

[REDACTED]

Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)]

[REDACTED]

Queensland Productivity Commission (QPC) [REDACTED] {Stakeholder (**s38**)}

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**UM4-RfI1**\*2 Would you please clarify if you would be receptive to engaging with the ABCB BCC to clarify if they have access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who can assist you to clarify APPENDIX 1 **RfA1** and in turn aspects of the QPC Terms of Reference.

\*2 **UM4-RfI1** means **Un-concluded Matter No.4-Request for Information No.1**.

## Part B (4)

# CONCLUDING SUMMARY RESPONSE

### SECTION 2

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 2 - **UM1** - BMM-**FSC** - **C5** - PartC001 RfAdv 004 - 002 – 001 sent Sunday, 3 August 2025 at 2:41 pm.

To: Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

Cc:

Honourable Premier David Crisafulli [Stakeholder (**S18**)].

Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

Queensland Productivity Commission (QPC) [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**Rfl1** PPW request clarification from BMM Attendees that they understand that NON-NATIONAL recognition of the CN941 Diploma of Engineering – AS1668 Air Handling Systems – **Fire Safety Systems** academic competency recognitions M00 EB141 Air conditioning (AS1668 Air Handling Systems) – Codes and regulations and M00 EB142 Exhaust Systems (AS1668 Air Handling Systems) designs, that are recognised within the Australian Qualifications Framework is a **NATIONAL FIRE SAFETY CONCERN** for people in Australia.

### SECTION 3

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 3 – **UM6** – Qld-012-File-Albany Creek SHS-QED39322024 – 001 sent Sunday, 17 August 2025 at 2:00 pm.

To: Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

And

Chair of BMM Judith Blake [Stakeholder (**S37**)].

Cc:

Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

Honourable Premier David Crisafulli [Stakeholder (**S18**)].

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

Queensland Productivity Commission (QPC) [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**UM6-Rf11** Would you both please clarify if you would be receptive to engaging with the ABCB BCC to clarify if they have access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who can assist Chief Superintendent Mark Kahler to clarify the APPENDIX 1 QFD position that reads; *QDF recognises and complies with the obligatory provisions applying to Registered Professional Engineers Queensland (RPEQ) under the Professional Engineers Act 2002 (PEA)* and in turn aspects of the QPC Terms of Reference.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 3 – **UM7** – Qld-012-File-Albany Creek SHS-QED39322024 – 001 sent Thursday, 21 August 2025 at 12:24 pm.

To: Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
And

Chief Superintendent Mark Kahler [Stakeholder (**S22**)]  
[REDACTED]

Cc:

Honourable Premier David Crisafulli [Stakeholder (**S18**)].  
[REDACTED]

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].  
[REDACTED]

Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].  
[REDACTED]

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].  
[REDACTED]

Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]  
[REDACTED]

**UM7-Rf11** Would yourself, Chief Superintendent Mark Kahler and a Queensland Government Queensland National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier representative be receptive to meeting with me to clarify if the Queensland Government have access to a **Competent Person** decided and registered (recorded) Queensland National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier representative who can assist us with addressing (non-compliant/non-existing) **decision notices** associated with Gympie Kitchen Hood Exhaust Ventilation Installations and in turn aspects of the QPCI Terms of Reference mentioned in APPENDIX 2.

#### **SECTION 4**

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 4 - **UM2** - LWP - HMSO - (S31) - Old Fire Safety Concerns - QFSC1 - 001 - 001 sent Monday, 4 August 2025 at 7:23 am plus – 002 sent Monday, 4 August 2025 at 9:28 (**Amdt**).

To: Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].  
[REDACTED]

Cc:

Honourable Premier David Crisafulli [Stakeholder (**S18**)].  
[REDACTED]

Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].  
[REDACTED]

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (S32)].

[REDACTED]  
Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (S38)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**UM2-Rf11** Would you please clarify if you would be receptive to PPW engaging with a National Construction Code - Volume 1 **Appropriate Authority** recognised AS(/NZS)AS1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier from each State and Territory to address the QPC Terms of Reference.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 4 – **UM3** - LWP - HMSO - (S31) - Old Fire Safety Concerns - QFSC1 - 001 - 001 sent Tuesday, 5 August 2025 at 3:52 pm.

To: Interim CEO of the ABCB Office Judith Blake [Stakeholder (S36)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (S37)].

[REDACTED]  
Cc:

Honourable Premier David Crisafulli [Stakeholder (S18)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (S31)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (S13)].

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (S32)].

[REDACTED]  
Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (S38)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**UM3-Rf11** Would you please clarify if you would be receptive to engaging with the ABCB Building Codes Committee to clarify if they have access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who can assist PPW/QFD address **NATIONAL FIRE SAFETY CONCERNS** that are associated with National Construction Code – Volume 1 AS(/NZS)1668 Mechanical Ventilation – **Fire Safety Systems** in Queensland and in turn aspects of the QPC Terms of Reference.

## SECTION 5

To: Local State Government Member: Mr. Tony Perrett (Stakeholder S13),

For: Gympie Q4570,

Queensland Liberal National Party (QLNP).

[REDACTED]  
Cc:

Mayor Hartwig (S32),

[REDACTED]  
Honourable Premier David Crisafulli (S18),

[REDACTED]  
**RfM** PPW seek the assistance of our Local Member to co-ordinate a meeting to be attended by yourself, Mayor Hartwig, a Gympie Regional Council NCC-V1 Appropriate Authority recognised AS(/NZS)1668 Mechanical Ventilation other Appropriately Qualified Person Design Certifier representative and the undersigned to input to this QPCI.

Chris Inglis – Office of Tony Perrett MP Response Wednesday, 30 July 2025 at 11:24 am in part reads:

For specific concerns regarding the Gympie Hospital or Victory College developments as highlighted in your correspondence, please contact:

The Hon. Tim Nicholls, Minister for Health – [REDACTED]

The Hon. John-Paul Langbroek, Minister for Education – [REDACTED]

Foot Notes !

FN1 The specific concerns that we are seeking Local Member assistance are Gympie Regional Council concerns.

FN2 The Queensland Productivity Commission has directed us to the Honourable Samuel O'Connor for these types of **Un-concluded Matters\*1** with our Local Member.

#### SECTION 6

Our Interaction Reference: PPW – TOR – Otipotcs – Part A – Section 6 – PPW – FSCawQGB – D1 – 001 – 001 sent Sunday, 27 July 2025 at 6:51 am.

To: Honourable Premier David Crisafulli (**S18**),

[REDACTED]

Cc:

Honourable Minister Samuel O'Connor (**S31**),

[REDACTED]

Our Local Gympie Member Anthony Perrett (**S13**),

[REDACTED]

**RfM** Would you please confirm that your office will co-ordinate an “in person” meeting to be attended by yourself, your Honourable Minister Samuel O'Connor, our Local Gympie Member Tony Perrett, a Queensland Government National Construction Code – Volume 1 (NCC-V1) Appropriate Authority recognised AS(/NZS)1668 Mechanical Ventilation other Appropriately Qualified Person Design Certifier representative and the undersigned to address **FIRE SAFETY CONCERNS** that are associated with Gympie Hospital Development [Development (D1)].

D1 is the non-compliant refurbishment of the Gympie Hospital Kitchen.

#### SECTION 7

Unable to engage prior to the end of August response closing time.

#### SECTION 8

Unable to engage prior to the end of August response closing time.

#### SECTION 9

Unable to engage prior to the end of August response closing time.

#### SECTION 10

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 10 – **UM5** – PPW – SA – R/A – AS1668 parts 2&4 – Section 28 – Complaint 3 – 005 – 001.

To: Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]

Cc:

Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]

Standards Australia Program Manager Sarah Nerson [Stakeholder (**S40**)]

[REDACTED]

Air Conditioning and Mechanical Contractors Association Ben Hawkins [Stakeholder (**S41**)]

[REDACTED]

Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]

Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]

Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]

Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

**UM5-Rfi1** Would you please clarify if you would be receptive to engaging with the ABCB BCC to clarify if they have access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Ventilation other **Appropriately Qualified Person** Design Certifier who can assist you to clarify APPENDIX 1 **Rfi2** and in turn aspects of the QPC Terms of Reference.

#### SECTION 11

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 11 – **UM8** – PPW Response 671562782 to ABCB Discussion Paper on BCR recommendation 19 – 001 sent Sunday, 24 August 2025 at 6:04 pm.

To: Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]  
Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]  
Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]  
Cc:

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

**UM8-Rfi1** Would ALL Senior Stakeholders please clarify if you can obtain access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who is an ABCB identified Registered Fire Systems Technical Designer who is appropriately qualified to understand the content of attached files **F3** and **F4**.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 11 – **UM9** – PPW Response 671562782 to ABCB Discussion Paper on BCR recommendation 19 – 001 sent Monday, 25 August 2025 at 12:43 am.

To: Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]  
Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]  
Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]  
Cc:

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .



**UM9-Rf11** Would ALL Senior Stakeholders please clarify if you can obtain access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who is an ABCB identified Registered Fire Systems Technical Designer who is appropriately qualified to understand the content of attached files **F3**.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 11 – **UM10** – PPW Response 671562782 to ABCB Discussion Paper on BCR recommendation 19 – 001 sent Tuesday, 26 August 2025 at 6:02 am.

To: Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]  
Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]  
Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]  
Cc:

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

**UM10-Rf11** Would ALL Senior Stakeholders please clarify if you can obtain access to a National Construction Code – Volume 1 **Appropriate Authority** recognised AS(/NZS)1668 Mechanical Ventilation other **Appropriately Qualified Person** Design Certifier who is an ABCB identified Registered Fire Systems Technical Designer who is appropriately qualified to understand the content of attached files **F3**.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 11 – **UM11** – PPW Response 671562782 to ABCB Discussion Paper on BCR recommendation 19 – 001 sent Tuesday, 26 August 2025 at 11:05 am.

To: Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]  
Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]  
Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]  
Cc:

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

**UM11-Rf11** Would ALL Senior Stakeholders please clarify if you can obtain access to a National Construction Code – Volume 1 *Appropriate Authority* recognised AS(/NZS)1668 Mechanical Ventilation other *Appropriately Qualified Person* Design Certifier who is an ABCB identified Registered Fire Systems Technical Designer who is appropriately qualified to understand the content of attached files **F3**.

Our Interaction Reference: PPW - TOR - Otipotcs - Part A - Section 11 – **UM12** – PPW Response 671562782 to ABCB Discussion Paper on BCR recommendation 19 – 001 sent Tuesday, 26 August 2025 at 12:12 pm.

To: Honourable Premier David Crisafulli [Stakeholder (**S18**)].

[REDACTED]  
Honourable Minister Samuel O'Connor Qld BMM Attendee [Stakeholder (**S31**)].

[REDACTED]  
Gympie State Government Member Anthony Perrett [Stakeholder (**S13**)].

[REDACTED]  
Chief Superintendent Mark Kahler [Stakeholder (**S22**)]

[REDACTED]  
Gympie Regional Council Mayor Glen Hartwig [Stakeholder (**S32**)].

[REDACTED]  
Interim CEO of the ABCB Office Judith Blake [Stakeholder (**S36**)],

And

Chair of Building Ministers Meeting (BMM) Judith Blake [Stakeholder (**S37**)].

[REDACTED]  
Standards Australia Head of Standards Development Richard Lambert [Stakeholder (**S39**)]

[REDACTED]  
Cc:

Queensland Productivity Commission (QPC) [REDACTED] [Stakeholder (**S38**)].

Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov).

**UM12-Rf11** Would ALL Senior Stakeholders please clarify if you can obtain access to a National Construction Code – Volume 1 *Appropriate Authority* recognised AS(/NZS)1668 Mechanical Ventilation other *Appropriately Qualified Person* Design Certifier who is an ABCB identified Registered Fire Systems Technical Designer who is appropriately qualified to understand the content of attached files **F3**.

## **SECTION 12**

Unable to engage prior to the end of August response closing time.

## **SECTION 13**

Unable to engage prior to the end of August response closing time.

## **SECTION 14**

Unable to engage prior to the end of August response closing time.

## **CONCLUSION**

Stakeholders will note from reading Page 2 of this Response to this Queensland Productivity Commission Inquiry:

**1-B v)** The legislation of the Building Code of Australia put my professional career on hold until I became an ***Appropriately Qualified Person***.

**1-B vi)** My professional career was on hold until 2006.

**1-B vii)** My Father (*Heavenly*) taught me to *firstly establish what the rules are and then ensure that I played by the rules*.

The PPW Group wish to offer a sincere and PUBLIC THANK YOU to the Honourable Minister David Janetzki MP for initiating this Queensland Productivity Commission Inquiry.

Lloyd Wayne (Known as Wayne) Palmer,  
Senior Member,  
The PPW Group.

## SECTION 4



**Our File Reference:** PPW – TOR – Otipotcs – Part B CONCLUDING SUMMARY RESPONSE APPENDIX 1 to QUEENSLAND PRODUCTIVITY COMMISSION INQUIRY.

**File Opened:** Sunday 31 August 2025.

**File Closed:**

# Queensland Productivity Commission

OPPORTUNITIES TO IMPROVE PRODUCTIVITY OF THE CONSTRUCTION SECTOR

## Part B

**CONCLUDING SUMMARY RESPONSE**

**APPENDIX 1**

**to**

**QUEENSLAND PRODUCTIVITY COMMISSION**

**INQUIRY**

*(Submitted Sunday 31 August 2025)*



Queensland Productivity Commission

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Primary Email: [enquiry@qpc.qld.gov](mailto:enquiry@qpc.qld.gov) .

[Redacted]

# Part B

## CONCLUDING SUMMARY RESPONSE

### APPENDIX 1

#### EXPLANATION BEHIND OUR FURTHER INVEST IN THIS FINAL RESPONSE APPENDIX 1

During today's (31.08.25) review of our Response to this Queensland Productivity Commission Inquiry PPW the below Aspects of our Response have impacted us.

- A1** Page 1 of our Initial Response titled "A Publication authored by The PPW Group in Response to the Queensland Productivity Commission" Amendment 1, email submitted 10 June (July is an error) in part reads:  
*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.*
- A2** PPW has been working six (6) days a week on our Response which commenced during our business week ending Friday 30 May 2025 and concludes today Sunday 31.08.25.
- A3** Page 8 of our Initial Response titled "A Publication authored by The PPW Group in Response to the Queensland Productivity Commission" Amendment 1, email submitted 10 June (July is an error) in part reads:  
**NOTHING IN THIS ACT MAKES THE STATE LIABLE TO BE PROSECUTED FOR AN OFFENCE.**  
This is typical of most of the CONSTRUCTION SECTOR Legislative Regulatory Framework.
- A4** Pages 11 to 15 of our Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025 record fourteen (14) SECTION(s) of Un-concluded Matters (UM) which are a SMALL SNAPSHOT of Stakeholder lack of interest/support regarding NON-COMPLIANCE CONCERNS and **FIRE SAFETY CONCERNS.**
- A5** Page 20 of our Initial Response titled "A Publication authored by The PPW Group in Response to the Queensland Productivity Commission" Amendment 1, email submitted 10 June (July is an error) in part reads:  
*PPW have contributed considerable pro bono\*1 input investment over my sixty (60) years in the Queensland Building Construction Industry.*  
*\*1 Pro bono means for the public good provided free of charge.*
- A6** **SECTION 2** Page 24 of our Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025 in part Reveals:
  - R1** Our Interaction Reference: PPW – TOR – Otipotcs - Part A - Section 2 - **UM1** - BMM-**FSC** - C5-PartC001 RfAdv 004 - 002 – 001 was sent Sunday, 3 August 2025 at 2:41 pm to Stakeholders **S36** and **S37** with Cc's to Stakeholders **S13, S18, S31, S32** and **S38**.
  - R2** It has been four (4) weeks and we have not received a confirmation of receipt from Stakeholder **S36/S37** regarding what we believe to be the PRIMARY **NATIONAL FIRE SAFETY CONCERN** for people in Australia.

## PREAMBLE TO OUR RESPONSE TO A1 TO A6

When time permits, we will be providing the Honourable Premier Crisafulli with our estimated commercial fees that would be associated with our Response to this QPCI for his awareness and comparison against Pro bono.

The Queensland Productivity Commission response email sent Tuesday, 22 July 2025 at 12:31 pm\*2 to Our Interaction Reference: PPW – TOR – Otipotcs – 013 sent Sunday, 20 July 2025 at 2:28 pm\*3 in part reads:

*It is unlikely we will be able to further consider the issue you have raised, in any great detail, as part of this inquiry and we suggest you further direct your queries to the Department of Housing and Public Works as the administering authority of licensing and building codes in Queensland.*

\*2 Refer to Page 18 of our Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025 for a copy of this email.

\*3 Refer to Page 19 of our Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025 for a copy of Our Interaction.

Given **A6-R2**, we have made the Decision(s) (**D**) to:

- D1** Focus on concluding the **SECTION 2 PRIMARY NATIONAL FIRE SAFETY CONCERN** for people in Australia on Page 24 of our Part B CONCLUDING SUMMARY RESPONSE Submitted Friday 29 August 2025.
- D2** Amend the primary address for further PPW Interactions with Stakeholders to **S36, S37, S39, S18, S31, S13** and **S32** with a Cc to the Queensland Productivity Commission Inquiry.

**FOR INFORMATION REGARDING SECTION 5 OF THIS PUBLICATION PLEASE REFER TO THE CONTENTS  
PAGE i INSIDE THE FRONT COVER OF THIS PUBLICATION**

Warm Regards,  
Lloyd Wayne (Known as Wayne) Palmer,  
Senior Member of The PPW Group.

