

12 July 2018

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Australian Institute of Architects

To whom it may concern

The Australian Institute of Architects (the Institute) welcomes the opportunity to make a submission to the Building Ministers Forum on the discussion paper relating to Permanent Labelling System for ACP Products.

The Institute is the peak body for the architectural profession in Australia, representing around 11,000 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

The increasing presence of non-conforming products and materials is a matter of great concern to members of the Institute. The use of non-conforming building products raises some very complicated issues, and dealing with it requires a multi-faceted approach, with public safety coming first and foremost, even if this comes with increased and more stringent regulation for the building industry.

There are short and medium terms solutions that can be implemented, with the labelling of ACP product being part of a long-term approach that includes Improved building documentation and education of all professionals involved in the sector as part of a holistic approach by all relevant authorities to deal with what is complex issue.

Options

The Institute believes permanent labelling should occur on the ACP panels themselves either through a permanently etched stamped or motif, or covert data marking technology. We recognise that etchings or motifs on the external façade will reduce the visual aesthetics of ACP and as such would prefer that these markings were made on the non-visible side of the panels. This would make identification available throughout the life of a building.

Ideally, we feel that covert data provides the best solution to permanent labelling. However, we recognize that this will be the costliest solution to industry - not only for the manufacturers, but also for installers, surveyors and regulators who will require the appropriate scanning equipment.

With regard to our preferred labelling options of permanent etching and covert data, in both scenarios there should be a clear link to a corresponding label on the packaging, as well as a link to building documentation that clearly identifies manufacturer, type of panel/composition and the relevant standards the product has been tested to, i.e AS1530.1 or AS1530.3.

The Institute supports moves to expand labelling to any cladding product that poses a risk to public safety, including expanded polystyrene cladding products.

The Institute does not consider that option 4: Maturation of Current Reviews and Reforms is an independent option, but rather, this should occur concurrently with any decisions to adopt a permanent labelling system for ACP. Resolving the issue on non-conforming building product and assuring public safety is a complex issue that will require a multifaceted approach. Regulatory reforms are only part of the solution. There is no doubt that increased education across all professions involved in the sector is also a crucial element in ensuring long term positive change. Ongoing reviews of the issue will be required to ensure that best practice across the sector is being achieved.

In summary the Institute feels that options 1: Permanently etched stamped or motif on the non-visible side of the panel, or Option 3: Use of Covert Data as the ideal labelling options to ensure the long term identification of ACP over the life of a building. We strongly feel that these options should be supported rather than replaced by option 4: Maturation of current reviews and reforms. The Institute recognises the important role that regulatory instruments and the ongoing reviews play in driving best practice, alongside education and engagement of sector stakeholders.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Jennifer Cunich". The signature is written in a cursive style with a large, stylized initial 'J' and 'C'.

Jennifer Cunich
Chief Executive Officer
Australian Institute of Architects