

Submission to the

BMF EXPERT ASSESSMENT

Assessment of the Effectiveness of Compliance and Enforcement Systems for the Building and Construction Industry across Australia

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December 2017

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BPIC Members: Australian Glass and Glazing Association | Australian Institute of Quantity Surveyors | Australian Steel Institute | Australian Window Association | Cement, Concrete & Aggregates Australia | Concrete Masonry Association of Australia | Engineered Wood Products Association of Australasia | Gypsum Board Manufacturers of Australasia | Housing Industry Association | Insulation Council of Australia and New Zealand | Insulated Panel Council Australasia | National Manufacturers Council | Roofing Tile Association of Australia | Steel Reinforcement Institute of Australia | Think Brick

BPIC General Response to the BMF Expert Assessment

This submission supports the Building Ministers Forum for its efforts in examining the broader compliance and enforcement problems within the building and construction systems (for example: education, licensing, design, quality assurance, competencies of practitioners, importation) affecting the implementation of the NCC, by commissioning independent experts to conduct this assessment.

The Building Products Innovation Council (BPIC) notes that Australia's building regulatory framework supports approximately 10 per cent of Australia's gross domestic product and nearly 10 per cent of Australia's workforce.

As the Australian Constitution does not mention matters regarding the safety, health and amenity of people in buildings, or land use planning and development, responsibility for these matters rests with the State and Territory Governments. As a result, we have a situation where states and territories have implemented eight individual building regulatory regimes.

A major step forward was taken in 1994 when the Council of Australian Governments (COAG) signed an intergovernment agreement that established the Australian Building Codes Board (ABCB) and tasked it with maintaining and improving the Building Code of Australia now known as the National Construction Coded (NCC). This same agreement also committed the Commonwealth, states, territories and local government to deliver a national administrative framework for building.

But 23 years later, the world has moved on and major disruptive influences have changed the manner in which building work is designed and delivered, how risk is allocated and how regulators seek to manage today's laws. Even if consistency had been achieved, it is reasonable to believe that these changes would still be a cause to ask whether the administration of building is effective and relevant. Whether or not the building regulatory framework is meeting community expectations is another question that needs to asked. The historic focus on the structural and fire performance of buildings as well as waterproofing is no longer seen by the industry or the public as comprehensive enough. Given that the majority of Australians spend the majority of their lives indoors, aspects such as thermal comfort, indoor air quality, daylight requirements and energy efficiency have become mainstream concerns.

In an age where building materials are no longer predominantly Australian made and the range of professionals involved in the design and construction of buildings has become more diverse, where a performance based building code underpins the administrative processes and where the way that buildings are constructed is changing rapidly, building compliance and control has become the subject of much scrutiny in recent years. Also the insurance industry is now factoring in resilience (a building's ability to cope with bushfire, flood, hail, wind, cyclone, earthquake and other foreseeable disasters) and building durability, while at the same time creating policy exclusions for non-conforming product and non-compliant building practices.

Observers have noted that our current system is nationally fragmented, needlessly complex and based on an old regulatory model which is increasingly incapable of dealing with modern industry issues and rapid change. It often fails to facilitate identification of defective work, fails to hold to account those responsible for building defects where these are detected, and fails to support innocent victims who inherit responsibility for resolving defective work.

A review of our state-based building control law is long overdue in the wake of recent building failures and has become a matter of some urgency. The following submission makes recommendations that seriously question the assumptions that underpin the current building regulatory framework in Australia. They are aimed at reducing complexity, improving the efficiency and effectiveness of the system, as well as future-proofing the system to meet the changing processes and products that will continue to emerge over the next decades.

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Recommendation 1 – Improve the Transparency of the BMF

Feedback from a recent BPIC survey indicated a high level of ignorance within industry regarding the very existence of the Building Minister's Forum (BMF). Survey respondents noted that the BMF seems to provide very little information on the issues it is working to address. Where the BMF has provided information, there appears to be no process for updating interested industry parties or the public. Where public statements of actions to be taken have been made, mechanisms for feedback also seem to be lacking. The same observations were made by respondents with regard to the ABCB Board and the Building Codes Committee.

Recommendation 2 – Improve Independence, Diversity and Inter-Communication of Regulatory Decision-Makers

Currently the BMF, ABCB, BMF-Senior Officers Group (BMF-SOG) and the national Building Regulators' Forum (BRF) all have representatives from similar organisations/jurisdictions. This not a good model for diversity of views and expertise because there a risk of potential group-think, or situations where if a group or jurisdiction doesn't get their way in one forum they can bring it to the next one. There should also be more interaction between these groups and others in related sectors such as planning, infrastructure, health and so forth.

The intention to create formal reporting lines to BMF with crossed lines of communication between the various bodies with different secretariats from different jurisdictions does not bode well for cohesive decision making. It involves duplication, inefficiency and a diminution of the long-established role of the ABCB Board.

Furthermore, nowhere in the current or intended arrangements is there the opportunity for ongoing public and industry input/consultation, nor are there any feedback mechanisms to gauge policy efficacy.

Recommendation 3 – Prioritise 'As-Built' Compliance

There appears to be little (if any) supporting information as to why our building regulatory framework focuses on 'as-design' compliance and not also 'as-built' compliance. Yet it is clear from industry and from recent building tragedies, that such an approach is misplaced at best and a danger to public safety at worst. Whilst industry accepts that the NCC is a code and that 'compliance with the code' is a jurisdictional matter, it has mystified many as to why the ABCB has not attempted to establish model compliance guidelines for jurisdictions to follow and why jurisdictions have not required 'as-built' compliance. Even within the NCC, opportunities abound for the inclusion of 'as-built' verification processes, but these have not been pursued. In the absence of hard quantifiable research that argues the benefits of 'as-design' compliance over 'as-built' compliance, BPIC recommends that measures be made to prioritise 'as-built' compliance mechanisms in both the NCC and in related jurisdictional regulations.

Recommendation 4 – Create Building Performance Trajectories

Whilst there is heated debate within industry and government about energy efficiency trajectories for the NCC, these discussions overshadow any discussion about code trajectories in general. There has never been a greater emphasis on building science and technology than there is today. Advances in building materials occur every year. Appliances are just beginning to be designed to communicate with buildings, with each other and with building users. Buildings can achieve new levels of quality, safety and energy efficiency, while the costs associated with implementing innovations are decreasing.

Unfortunately we are not seeing a corresponding effort on the part of the BMF to set code trajectories in the areas of structural, waterproofing, fire safety and so forth. In fact, none of the key building elements of the NCC has a clear trajectory or even the hint of considering that there might be a need for such things. This rudderless approach means that industry has no clear pathway beyond the regular 3-year update cycle of the NCC.

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a brake on innovation, stifles economies of scale and deters investment in product development and manufacture.

A further consequence of the lack of code trajectories is that it hobbles the ability of ABCB staff to be able to develop effective and well supported code changes that meet long-term regulatory objectives. In the absence of this strategic leadership, mid-level bureaucrats find themselves having to make significant building regulatory changes in response to short-term crises or current political issues.

Recommendation 5 – Encourage Regulation Enforcement by Jurisdictions

One of BPIC's major criticisms of the current building control regime in Australia is the ever-decreasing appetite for the enforcement of building codes and regulations. As has been pointed out by many experts, good legislation and strong regulation is useless without adequate enforcement. This is a multi-jurisdictional problem where no-one seems willing to take responsibility for building conformity and compliance. As pointed out by recent high-level government investigations in Queensland (Wallace Report), New South Wales (Lambert Report) and Victoria, building regulators have not been auditing approval authorities and design professionals, nor have they been conducting a host of other compliance and enforcement processes that their own legislation says should be done.

Recommendation 6 – Spread Conformity Responsibility Across the Construction Process

A cursory check of the various building acts in each jurisdiction will show that most of them absolve everyone in the building supply chain - except for the building certifier - of specific responsibility for the compliance of buildings. The absence of a 'duty of care' from everyone in the building supply chain creates the lack of a legally enforceable regime of responsibility for compliance. This is inappropriate, as it leaves the checking of projects until the very final stage of construction. The result is significant risk because by that time, non-conforming building products and non-compliant practices are often hidden away inside the structure. In addition to the difficulty in locating non-compliance, the cost of rectification is highest at the final construction stage.

Recommendation 7 – Consolidate Jurisdictional Legislation Related to Buildings.

BPIC notes that in each jurisdiction, building control measures are scattered amongst a range of legislative vehicles (e.g. Building Act, Planning Act, Strata Act, Conveyancing, and so forth). In many cases there are clear inconsistencies and sometimes conflicts in relation to duties and the parties expected to carry out those duties. Any review of the building control mechanisms must also incorporate all the related and interlocking legislative requirements that are in force.

Recommendation 8 – Commission an International Best Practice Review of the NCC

There has not been a detailed study undertaken to benchmark Australia's NCC against other building codes internationally. However there are criteria we might use to ascertain for ourselves, how effective the NCC is in practice. Consider some of the following criteria the Global Building Performance Network uses to compare international building codes:

Levels Beyond Minimum

• Does the code and complementing policies encourage buildings to go beyond minimum requirements?

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- Is this well documented for instance by certification schemes introducing well defined classes 'above standard level'?
- Can the code 'stretch' or 'reach' beyond minimum requirements and reward buildings that achieve significant savings, improved performance or lower insurable risk than standard design?

Enforcement Standards and Guides

- Does the code set out suggested post occupancy verification processes, standards and guides?
- Are surveys independently conducted on compliance rates and do they demonstrate a high rate of compliance?

Certification Standards and Guides

- Does the code set out suggested post occupancy certification processes, standards and guides?
- Is the certification system robust and well integrated in the process?

Policy Integration

- Is there a system of rating or labeling for building components?
- Are there any special incentives or requirements for public buildings to pave the way for the rest of the market?
- Are there supporting measures, which increase building performance and or allow minimum requirement levels to be exceeded (e.g. reduced property tax, lower insurance higher incentive, better loan conditions, grants etc.)?
- Are there education systems to ensure capacity in all parts of the construction sector?

Recommendation 9 – Reassess the Performance-Based Construction Code Compliance Regime

The performance-based NCC was developed around a hierarchy of requirements for buildings, drawing heavily on the hierarchy that was published by the Nordic Committee on Building Regulation in the late 1970s. The ideology behind a performance-based code is that it focuses on the following attributes (IRCC, 2010):

- Minimum requirements, not aspirational goals.
- Objective outcomes, not subjective methods.
- Final product delivery, not process of delivery.

The theory is that performance-based regulations have been considered useful in reducing ambiguity in product requirements across interstate and international market borders. Where prescriptive, process oriented regulations may generate confusion, performance requirements are thought to provide clearer means of assessing suitability and eligibility of traded goods in different markets. The expected results were a greater use of internationally developed products within domestic markets.

But it is also well known that performance based codes have some serious down-sides that have been documented in the Centre for International Economics' report – Benefits of Building Regulatory Reform (2012):

- Increased costs of building surveying, engineering and design associated with performance-based solutions.
- Increased difficulties in assessing compliance with performance-based regulation.
- Increased lifecycle costs, including:
 - A tendency for performance-based design solutions to shift the financial burden from the construction phase to the owner in the maintenance phase, from passive systems to active systems.
 - When builders/developers use the performance approach to reduce cost to the exclusion of other considerations or where the final performance based approach results in lower building performance than the DTS approach.

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- Performance-based design solutions may increase the level of energy and water consumption by building occupants.
- Decisions made at the design phase to meet performance requirements may specify or restrict how space in the building can be used.

The problems don't stop there, performance based building solutions are intrinsically more complex and:

- Significantly increase insurance costs while reducing underwriting options due to higher risk profiles presented by performance-based solutions.
- Result in an increase of imported products (much of it poorly regulated) into the building market.
- Introduce a need for increased competence of practitioners involved in design through to implementation of designs is necessary in order to achieve compliance.
- Increase the risk of non-compliance as contractors need to deliver "one off" bespoke or custom variants for which they have insufficient training most building industry training is aimed at mastering standardised construction techniques and installation approaches.
- Result in owners being unlikely to have awareness of the impact of performance-based designs and may be oblivious to requirements that could impact their legal obligations.

Much of this down-side risk associated with a performance based code and building solutions would disappear if the correct supporting policies, administrative processes, regulatory environment and industry skills training were in place through the application of state and territory building legislation. Unfortunately our building regulatory regime has rushed headlong into embracing a performance based paradigm, whilst at the same time propping up and promoting a prescriptive based building administration eco-system. Whilst performance and prescriptive regimes are not mutually exclusive, they have enough differences for serious and systemic code compliance issues to manifest.

As an example, most tradespeople learn their trade by doing things repetitively and hone their skill through greater and greater familiarity with existing materials and common construction practices (prescriptive Deemed-to-Satisfy compliance). To solve a particular construction problem or challenge on a building the designers might create a performance based solution for part of the structure. But when it comes time to construct the building, the DTS tradespeople will find the performance based component challenging and unfamiliar with no experts to guide them in how best to construct/install the performance solution. In this all-too-frequent scenario, there is a high chance of error, poor workmanship, wrong installation and/or non-compliance with the NCC.

Perhaps it is time for licensed tradespeople in each jurisdiction to have their skills assessed against DTS or performance-based requirements and to be certified accordingly, so that DTS competent licencees are not able to undertake performance-based work and vice versa.

Recommendation 10 – Improve the NCC Drafting, Review and Change Process

The primary means of revision of the NCC is via the Proposal for Change (PFC) process, whereby individuals and/or the industry can propose changes to the NCC for consideration. The process is supposed to be democratic, effective and efficient, but is it? PFCs appear not to be judged on their inherent merits, but on the volume of quantitative supporting data and the number (and significance) of organisations that support the change. There appears to be evidence that the PFC process can allow critical code problems to endure for years before rectification.

A case in point is widespread misuse/abuse of the residential Reference Building compliance method. In January 2013, a PFC was lodged with the ABCB calling attention to the fact that the Reference Building Verification provisions of the NCC Volume Two were being used as a first choice assessment method instead of the more appropriate Deemed-to-Satisfy (DTS) process on standard residential designs, and also to achieve poor design compliance (less than 6 Star energy efficiency) rather than innovative design compliance. The PFC was not

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progressed because the proponents only had anecdotal evidence and were only able to secure the support of four other organisations. As of the release of this Issues Paper, the problem has grown exponentially worse in a number of jurisdictions (primarily WA, SA, VIC and NT) and a working group within the ABCB has been formed to review and tighten up the Reference Building Verification provisions for the 2019 release of the NCC. This six and a half year lag between code problem identification and code problem resolution is not uncommon, but nor is it acceptable for a 21st century regulatory regime.

The PFC process also has another less obvious but equally troubling aspect. Even if a PFC is speedily reviewed and adopted, it often only fixes one aspect of the NCC and can ignore interrelations with other parts of the code. Hence there is widespread industry criticism that the NCC contains many instances of rules laid down in one section that contradict or weaken other parts of the code.

Other areas of concern regarding the NCC development and review process include:

- The PFC process seems to operate as a pseudo feedback mechanism, in the place of a proper feedback mechanism from each jurisdiction. By divorcing code development from code compliance, the NCC often ignores the practicalities of compliance because it is seen as a jurisdictional issue and not the ABCB's problem.
- In light of the fact that the NCC is referenced in the majority of building litigations and disputes, it seems incongruous that the document is not reviewed either through legal peer or Law Society to check the wording of the code. The benefits of having legally unambiguous code definitions and clauses would be substantial.
- The trend within the NCC over the last few years has been to push people to look up referenced standards and not articulate requirements within the NCC. This factor appears to be a contributing factor in the growing problem of building non-compliance. In effect, standards are being used as blanket proxy compliance mechanisms instead of clearly articulating the compliance requirements in the NCC.
- The substantially disjointed nature between the development of the NCC (by the ABCB) and its implementation and administration (by jurisdictions) appears to be leading to a lack of willingness on the part of ABCB staff, to provide industry advice. This situation is compounded by the fact that even if ABCB staff might be willing to help practitioners, they do not have the regulatory authority to provide advice and determinations regarding the NCC.
- The NCC is perceived to be a document that repeatedly leaps from high level principles to minute details (e.g. the size of CPR signs around pools), with the assumption is that users will seek advice if they don't understand anything, but this is often not the case. Furthermore the means of determining compliance or pursuing non-compliance is inadequate and there is inadequate assignment of responsibility/processes to parties in the building supply chain other than builders (e.g. specifiers, suppliers, installers, etc).
- The NCC is written primarily from the point of view of how buildings should be used and makes no accommodation how people actually use buildings.
- The NCC is written from the standpoint that materials and products will be installed in a structure in a setand-forget manner, ignoring repair and maintenance issues (e.g. post-construction access and inspection).
- The NCC is full of definitions and terminology that is not commonly used (nor understood in some cases) by the industry. This reduces the readability and comprehensibility of the document and contributes to non-compliance.
- Much of the evidence supporting the NCC and its directives, is based on Australian circumstances. However, Australia has too small a population to determine statistical significance of some issues in key areas. The NCC should be more embracing of overseas statistics and data.
- Certificates of Conformity (with the Building Code of Australia performance requirements) where available, are not always explicit in respect of the range of use or circumstances in which a product may be relied upon to be fit for purpose.

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Recommendation 11 – Incorporate Building Design Policies into Jurisdictional Legislation

Whilst the current building regulatory regime in Australia focuses primarily on the materials and construction methods used to create buildings, the management of the design aspects of buildings (especially residential) should be an essential part of any effective and community-focused building control system. This has been recognised in New South Wales by virtue of their State Environmental Plan Policy No. 65 (SEPP 65). The SEPP 65 policy aims to improve the design quality of residential apartment development in recognition of the economic, environmental, cultural and social benefits of high quality design. The policy also serves to protect NSW from the unscrupulous development of 16-20 sqm 'prison-cell' style apartment complexes that might otherwise occur in that state and other jurisdictions. At the same time, the policy is derived from extensive community and industry input thereby reflecting community expectations in regard to access, amenity, sustainability and affordability. It seeks to strike a realistic balance between the need for commercial return on investment by developers, and the desire for good design and amenity for owners and occupiers at an affordable price-point, while at the same time providing clear guidance for development approval authorities.

BPIC suggests that this policy model should be incorporated into other jurisdictional legislation to allow the public in each State and Territory to have a say in the type and style of building stock they are provided with in the future.

Recommendation 12 – Australian Standards to be Free

Standards are a vital component of the Australia's building regulatory framework with over 130 referenced in the NCC alone. Standards Australia's intention, once its contract with SAI Global terminates, is to establish a multichannel distribution network. The theory is that completion among channel distributors will drive the purchase cost of standards down and provide for better servicing of stakeholder needs.

But this approach can lead to unintended and potentially negative consequences. One such example is channel distributors carving up the standards distribution market into niche and defensible specialist areas where they can demand a premium for the supply of standards. As we have seen in other industries, the electricity supply industry for example, the multi-channel distribution model has actually driven prices inexorably higher over time not down.

BPIC does not believe this is a healthy or effective business model for industry and the Australian economy. Instead BPIC recommends that Standards Australia explores alternative business models that will offset the cost of generating standards in the first place, and make access to standards fair and equitable (preferably free or very low cost).

Recommendation 13 – Consider Compliance Requirements for Strata and Other Multi-Owner Buildings

Australia's building regulatory regime works from the assumption that buildings will be owned and controlled by single individuals or by homogenous, responsive and effective corporate decision-making bodies. Even the various strata acts around the country fail to accommodate the extreme difficulty of establishing simple majority (let alone consensus) decision-making by owners corporations and other forms of multi-party building ownership.

The situation is further complicated by the fact that most apartment buildings are constructed by individuals or organisations that have not only a short temporal interest in the building, but are not the final owners. Because the NCC and current jurisdictional building legislation creates only a 'first owner' duty of care situation, subsequent building owners are left without effective recourse for design and construction decisions (as well as mistakes) made before they became owners.

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This is inconsistent with other types of consumer law and common law related to property ownership. In the majority of instances a duty of care exists between a manufacturer/supplier of a product and all subsequent owners of that product.

Perhaps it is time for Australia's building regulatory compliance requirements be reviewed to extend a construction compliance duty of care to all subsequent building owners and to identify and remediate regulatory requirements that are being thwarted by the realities of complex and often ineffective multi-party building ownership decision-making.

Recommendation 14 – Introduce a 'Cab-Rank' System for Assigning Building Certifiers

BPIC supports the concept of a new 'cab rank' type model for assigning building certifiers to overcome conflict of interest issues associated with builders able to self-select certifiers. This would involve consumers or builders approaching their relevant agency responsible for regulating and licensing building certifiers, to be assigned a building certifier. Furthermore, the new system would require certifiers to physically attend mandatory inspections. As part of the design of such a scheme the wording needs to be such that "physically" means at the actual point and specific time where the work is to be inspected (i.e. mere physical presence on the site, drive-by, or drone over-flight will not suffice). The wording should also ensure that if the inspections are delegated by the certifier that an appropriately qualified/licenced person undertakes the delegated work. Of course, when checking materials compliance on site, a realistic minimum sampling size should be set and adhered to by certifiers in order to avoid instances of 'type testing' or 'golden sampling'. Wording should also encourage certifiers to adopt digital technologies such as barcode/RFID scanning of products/packaging/delivery documents on-site to ensure products are as specified in the bill of quantities. Thought also should be given to developing a national and standardised 'as-built' inspection checklist that all certifiers must use, such as the one developed and successfully piloted across twenty LGAs by NEEBP (National Energy Efficient Building Project).

Recommendation 15 – Licensing Processes Should Include Audits

The trade licencing requirements in each jurisdiction should be nationally standardised and also include QA audits of licencees along with associated remedial and punitive processes in place for those found to be sub-standard professionally. These processes need to accommodate the fact that it is very difficult to hold tradespeople accountable because a number of simple tactics can be used to frustrate any punitive or remedial measures. These range from claiming ignorance of the full legal implications of their role, to lodging counterclaims against auditing bodies for lost business revenue while proceedings are underway, to dragging out the appeal process, to producing biased witnesses on their behalf and so forth. There is also the difficulty of obtaining unambiguous, objective evidence of wrong-doing especially in any scheme where 'professional judgement' is exercised (what one tradesperson thinks is a substandard work, might be perfectly fine to another tradesperson). Licencing processes should also include auditing of financial accounts when licences are renewed, in order for the regulatory body to assess the financial wellbeing of licensees.

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The Role of BPIC

The Building Products Innovation Council (BPIC) is a national peak body representing Australia's leading building products industries and related services (listed in the footer of this document) in:

Steel	Gypsum Board	Concrete	Quantity Surveyors
Insulation	Timber Products	Roof Tiles	Glass
Windows	Clay Bricks	Concrete Masonry	
Cement	Housing Industry	Insulated Sandwich Panels	

BPIC's members and associated companies directly employ over 200,000 Australians with more than 470,000 employed indirectly. Their collective industries are worth over \$54B in annual production to the Australian economy. BPIC is a not for profit organisation governed by a Board of Directors comprised of representatives from its member organisations.

BPIC's primary objective is to provide coordinated representation of the building products industry to interested parties including Government, the construction industry, and the general public to help improve building and construction standards. We also provide a forum for discussion, information sharing and policy formulation among major product categories in the building industry. BPIC's mission is to:

- Promote the efficient production and use of building products within a nationally consistent regulatory environment.
- Develop policy and make submissions or representations to governments, industry and the community on agreed technical standards, codes and regulatory issues of mutual concern to Members.
- Promote the innovative use of building products.

BPIC works to fulfill these aims by gathering and supplying practical and current industry information on behalf of BPIC member organisations and other organisations and companies that are not members but follow BPIC through various means. This industry-wide approach to responding to regulatory issues, helps to ensure that Governments are informed of possible problems in the building industry and are provided with appropriate industry-considered responses. BPIC also encourages investment in skills formation, product development and industry research by helping to identify and remove regulatory impediments to innovation.

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