



The Association of  
Hydraulic Services Consultants Australia

## Submission 63

The Association of Hydraulic  
Services Consultants Australia

QUEENSLAND CHAPTER

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### Submission

#### The Operation & Performance of the Qld Building Services Authority

1. The QBSA Board does not consist of any representatives from fire / hydraulic design, building design or building certification professions. In 2010, the Queensland Chapter of The Association of Hydraulic Services Consultants Australia (AHSCA) received a request from the QBSA to nominate representatives from the hydraulic services consultants profession for the QBSA Board positions. Three AHSCA Full Members submitted applications for QBSA Board positions. Hydraulic Services Consultants are professionals who are licensed by the QBSA to provide certified designs of fire and hydraulic systems and certify the final installation of these systems. The QBSA also licenses building certifiers, building designers, all professionals who design, inspect and certify critical aspects of buildings. In 2012, the QBSA informed the AHSCA of the 2011 QBSA Board appointments. No building professional disciplines are represented on the QBSA Board and, as such, the QBSA fails to adequately administer the licensing of professional building disciplines.
2. The QBSA fails to provide an appropriate process for the application and continued licensing of hydraulic services consultants. New license applications and annual renewals are required to complete forms that relate to builders, builders sub-contractors and building industry trades. Fire and hydraulic services consultants design and document plumbing and fire services for buildings. The product that hydraulic services consultants deliver is intellectual property. The AHSCA request that, if the QBSA are to continue licensing fire and hydraulic services consultants, that the QBSA provide a program for the implementation of a specific licensing regime that aligns with a building services design profession.
3. The QBSA licensing system fails to encompass fire and hydraulic services designed by individuals or companies practicing under the Registered Professional Engineers Act of Queensland. If a complaint is received by a QBSA licensed fire and hydraulic services consultant, the QBSA investigate and treat that complaint as if it were defective building work. The QBSA is able to issue directives to QBSA licensed fire and hydraulic services consultants. If the same complaint is lodged to QBSA relating to a Registered Professional Engineer the QBSA cannot take any action. Furthermore, the QBSA do not lodge or follow up complaints pertaining to Registered Professional Engineers with the Board of Professional Engineers of Queensland. This anomaly is bias and unfair to fire and hydraulic services consultants licensed by the QBSA. The bias also fails to protect consumers and the general public that the QBSA are supposed to represent and protect.

4. Fire and hydraulic services consultancy practices licensed with the QBSA with an annual turnover exceeding \$400,000 are required to provide an annual financial report to the QBSA. The cost of this report, which must be prepared by a chartered accountant, is approximately \$2,500. A small fire and hydraulic services consultancy consisting of two qualified fire and hydraulic services consultants, or even one consultant and two support staff, must exceed the \$400,000 turnover to remain viable. Again, we must reiterate fire and hydraulic services consultants do not install or maintain fire and hydraulic services, our product delivered is intellectual information, not materials or workmanship.

Registered Professional Engineering practices are not subject to this onerous QBSA reporting requirement by the QBSA or the Board of Professional Engineers of Queensland, despite providing the same services as a fire and hydraulic services consultancy.

The QBSA financial reporting requirement is expensive, onerous red tape and bias towards Registered Professional Engineering practices.

5. The QBSA do not pursue or lodge complaints pertaining to fire and hydraulic services design or documentation when the complaints relate to Registered Professional Engineering practices. During the last decade, there have been numerous cases where consumers have to lodge complaints against building contractors for the defective hydraulic building services. If the Commercial and Consumer Tribunal deem the complaint is against a Registered Professional Engineering practice and not the building contractors the QBSA absolve their responsibility of the complaint. The consumer then has to pursue the complaint through the Board of Professional Engineers and again to the Commercial and Consumer Tribunal. If the Registered Professional Engineering practice is found to be negligent civil court action is required. History proves that, in the majority of cases, the consumers cannot fund civil court costs. Again the QBSA policies are unfair to QBSA licensees and consumers.
6. The QBSA does not enforce local government authorities to reject fire and hydraulic services design documentation lodged by unlicensed hydraulic services designers. Unless a consumer or a licensee lodges a complaint to the QBSA there is no enforcement of QBSA policies by the QBSA. The failure of the QBSA to administer or police their own policies is unfair to licensees and the consumer.



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on behalf of the Management Committee  
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