

To Whom It May Concern,

I am a Director of a business that works predominantly in plumbing and fire services (including fire hydrants and hose reels), which is a type of work that is covered by a QBSA licence.

Unfortunately, we have a number of concerns with our industry at the moment, including:

- the lack of adequate training available in the fire services industry;
- the ease by which licences can be obtained in the fire services industry;
- the resultant lack of knowledge of licensed contractors and the potentially life threatening results of work being carried out incorrectly in the fire services industry;
- defective works going unnoticed for years in the fire services industry because no one follows up on works that have been completed – there is no industry “watch dog”;
- the lack of knowledge of the QBSA about the fire services industry, an industry which they are supposed to regulate;
- the lack of action by the QBSA and other authorities when a complaint is made by a contractor about unlicensed or defective work; and
- the high fees that go along with maintaining a QBSA licence, particularly in circumstances where it is unclear how the QBSA assists our industry.

In our experience, the QBSA offers little to contractors other than issuing a licence (which, amazingly, particularly in the fire services industry, happens without any form of practical test or checks on industry experience) and the QBSA is currently failing to regulate and / or maintain proper standards within our industries. We are aware of several complaints made to the BSA in relation to unlicensed and / or defective work in the fire services industry over the last 4 years by various contractors for example, which have still not been addressed.

Together with some other contractors in our industry, we recently met with the QBSA, MPAQ and PIC in relation to these concerns (amongst others) in an effort to move our industry forward. Unfortunately, as part of that meeting, the BSA advised that they are not able to deal with complaints that they receive from contractors, only those from consumers / building owners – a recording of this meeting is available upon request. If this is correct, we submit that the QBSA’s jurisdiction should be broadened immediately to also allow them to adequately address complaints made by contractors.

We also make the following submissions in relation to the QBSA’s role in our industries:

1. The QBSA is currently failing to regulate the plumbing and / or fire services industries and is failing to maintain proper standards – as noted above, no one follows up on works completed (i.e. there is no auditing process) and complaints made by contractors are simply not being addressed.
2. The QBSA fails to achieve a balance between the interests of contractors and consumers, as it fails to represent the interests of contractors at all.

3. The QBSA fails to provide remedies for defective building work when reported by contractors, as noted above.
4. The QBSA fails to provide support, education or advice for contractors in our industry at all. No one at the QBSA has sufficient knowledge or expertise to be able to provide support or advice in our industry – in relation to the fire services industry in particular, it would be good to have an industry body like AFSPAB involved, as they would be able to provide the necessary support and advice to licensed contractors.
5. The current licensing requirements of the QBSA in relation to fire services are inadequate – as noted above, licences are being obtained too easily and are allowing contractors without the requisite knowledge and experience to undertake works. This leads to defective works being carried out, which can go unnoticed for years and which puts lives in our community at risk. At the very least, we submit that a board of experienced examiners be set up and that all persons seeking a contractor's licence in the fire industry undergo a series of questioning and a practical test in order to gain a licence. Further, we submit that there should be various levels of licence that one can obtain within the fire industry – for example, a licence to carry out an inspection of a simple fire service should be very different to the type of licence you need if you are to conduct a 5 yearly test on a fire system in a multi-level building with multiple pressure zones. Allowing someone with a basic licence to conduct the latter type of test (as is allowed under the current system) is outright dangerous.
6. The QBSA's current auditing processes to maintain proper standards are insufficient in relation to our industries – in fact, it would appear to us that there are no auditing processes currently in place in this regard at all. We submit that auditing should be conducted at random to ensure the safety of our community and that it should be mandatory for the QBSA to follow up on all complaints received by contractors (as well as building owners) as part of this auditing process.
7. Industry groups (such as AFSPAB) should take a greater role in helping the QBSA to develop better licensing standards and procedures within the fire industry, as licences are being obtained too easily, non-compliant work is being done as a result and there is currently nowhere to go for advice.
8. Reforms should be implemented so the QBSA is able to provide assistance for industry / contractors as well as for consumers.

We have substantial evidence to demonstrate each of the above concerns and would appreciate the opportunity to discuss these issues with you further.

Kind regards,

Sam Hannant
Open Plumbing Pty Ltd