



MASTER BUILDERS
A U S T R A L I A

26 September 2025

Rod Balding
Chief Executive Officer
Standards Australia
Level 9, 20 Bridge Street Sydney NSW 2000

Via email: rod.balding@standards.org.au

cc:
Pam.Sae-Loy@standards.org.au
gdando@exigant.com.au

Consultation Paper – Standards Development End-to-End Review

Master Builders Australia (Master Builders) takes this opportunity to respond to the Consultation Paper – Standards Development End-to-End Review (Consultation Paper).

As you would be aware, Master Builders actively participates in a range of Standards Committees across technical areas, work, health and safety and contracts, uniquely placing us to provide feedback.

Overall, the work of Standards Australia (SA) is supported by industry. The development of Standards is complex and multi-faceted, requiring a unique mix of skill and perseverance to ensure the best outcome for industry broadly and industry participants specifically.

When the pursuit of these outcomes becomes derailed the Standards development process becomes fraught, frustrating and unnecessarily time consuming. Master Builders sees that narrowing and prioritising the work of SA will return it to a 'robust, transparent and fit-for purpose process' in support of better outcome for the building and construction industry.

To that end, the relationship between the ABCB, NCC and Standards Australia creates workflow, prioritisation and governance challenges. The interconnectedness between these key pieces of the regulatory landscape that impacts the building and construction industry should also be considered as a factor affecting the development of Standards.



Prioritisation and Assessment of Needs

Proposals for change must be subject a clear assessment process that includes specific criteria, Master Builders proposes the following approach:

1. Establishment of core areas of focus

To ensure the development of Standards and proposals for change reflect baseline or minimum requirements SA, in consultation with appropriate industries, should establish core areas of focus.

As a starting point, Master Builders suggests that all of the work of SA have a clear linkage to current key areas such as resilience (fire and wind), water and weatherproofing, accessibility and modern methods of construction.

This approach provides further guardrails to ensure the work of SA is not driven in an ad hoc way or targeted at progressing vested interests.

This could be reviewed every 2 years to ensure the core areas continue to reflect industry needs and relevant government policy.

2. All proposals for change/standards development 'tested' via preliminary industry consultation

In support of the first step, asking for a 'sense check' from industry on proposals etc establishes an appropriate mechanism to ensure the work of SA is in the best interests of industry and reflects their needs.

This industry policy forum would discuss proposals, support their development and assist with priorities for the ABCB. For significant proposals, this should include a comprehensive assessment of net community benefit.

3. Endorsed work to be scoped appropriately

Master Builders acknowledges progress to date regarding the clearer scoping of work to be undertaken. However, further emphasis on this phase of project development is needed to clarify work scope to ensure successful and timely outcomes.

4. Review of work against items 1-3 above

While Master Builders understands that SA has existing mechanisms to review work underway, a review of these internal processes may be warranted to ensure issues or challenges, such as scope creep, are identified and responded to early.

Efficiently and Effectiveness of the Development Process

A clear and agreed scope of work is fundamental to ensuring an efficient and effective development process. Project managers and Committee Chairs must hold committees to their scope. Equally, committee members should have a direct responsibility to not stray beyond this.

We see a growing trend of a desire by some committee members to include items in standards beyond the minimum. Master Builders sees that 'better' and 'best' standards can be used as case studies (for instance, in an appendix section) or as a separate document.

Guidance on identifying the differences between the 'minimum' and 'best' or 'better' approaches must be understood by project managers and committee chairs and maintained by the work of the committee. We understand that some groups are already doing this by developing minimum standards and working on core-plus best practice examples.



Governance, Integrity and Committee Composition

Master Builders has experienced a shift in the composition of technical committees.

While industry remains represented, other technical experts often outweigh industry representation. This often leads to a 'mismatch' between the practical needs of industry and the often largely 'academic' approach of technical experts.

There should also be a reconsideration of the number of members of technical committees, including regular reviews based on contribution and attendance, to ensure the committee is workable and productive.

On these two matters, collecting feedback via survey might provide SA useful insights on a semi-regular basis.

Conflicts of interest must be disclosed both prior to and during relevant discussions.

Equally problematic are personal/business vested interests that are often much more subtle than any conflict of interest an industry association must manage and disclose. Further thought should be given to how to manage these, for example, in more extreme cases, excluding an individual from consideration of certain matters may be the most appropriate approach. For example, during the deliberation of dispute resolution clauses within AS4000, members of a certain dispute reference bodies contributed to the discussion, putting forward a strong view regarding certain approaches that reflected this interest.

In time, more detailed guidance for committee members on disclosure is recommended.

Master Builders also sees a need for greater alignment between the NCC and SA to ensure that moves to implement government policy or ideological positioning does not override the necessary process of technical expertise to inform the standard. To that end, SA should play a greater role in informing ABCB decisions.

We apologise for the delay in responding and look forward to discussing this further in the coming weeks.

Yours sincerely

Denita Wawn
Chief Executive Officer
Master Builders Australia