



11 October 2024

Mr Tom Dixon, Independent Chair of the Review
Ms Kylie Armstrong, Executive Officer of the Review
**2024 Statutory Review of the
Building and Construction Industry Training Fund and Levy Collection Act 1990 (WA)**

By email: statutoryreview@ctf.wa.gov.au

**SUBMISSION BY AUSTRALIAN INSTITUTE OF ARCHITECTS WESTERN AUSTRALIAN CHAPTER
AND ENGINEERS AUSTRALIA WESTERN AUSTRALIAN CHAPTER**

Members of the Australian Institute of Architects (the Institute) in Western Australia and Engineers Australia together employ thousands of people in WA's building and construction sector, working to deliver billions of dollars' worth of public and private sector projects each year.

The contribution of WA architects and engineers is incredibly diverse - from CBD high rises through to multi and single residential projects, community infrastructure, state of the art schools, transport infrastructure and much more spanning the breadth of our State.

As a critical part of the construction sector, the WA Chapter of the Institute is dedicated to improving our built environment and our diverse communities across the State by promoting quality, responsible, resilient design and advocating for the benefit of all Western Australians.

Engineers Australia is Australia's national body for engineering and the voice and champion for over 17,000 members in Western Australia. Engineers Australia serves our members through providing them with the resources, connections and growth they need to do ethical, competent and high-value work in our communities.

We are pleased to have the opportunity to provide our comment on the Review.

Our recommendations for the Review:

1. Amend the definition of "construction work" to remove the distinction between "on-site" and "off-site work", to enable architects, engineers and other design professionals to benefit from training support via BCITF, to improve the quality and resilience of WA's built environment and equipping our State for the future.
2. Alternatively, unfetter the power to allocate CTF funds from the definitional strictures that condition the collection of levies; making clear that the power to allocate funds should extend to supporting key activities relating to the building and construction - in particular training of architects and other design professionals (including engineers), to improve the quality and resilience of WA's built environment and equipping our State for the future.
3. Further, in relation to unfettering the power to allocate CTF funds, make clear that the power to allocate funds should extend to Research and Development (R&D), to improve the quality and resilience of WA's built environment and equipping our State for the future.



4. Include these initiatives in the State Government's "Building Better reform package" to enhance building design and construction.

Background:

At this time of significant challenge in the construction sector, a focus on skills and training for all participants is crucial.

We need to look at new ways to address the housing shortage; historic methodologies for design and construction are no longer delivering housing in a timely manner and at the scale required.

- We need to upskill all participants to move in new directions, including prefabrication and AI, to help address current construction challenges including delivery of housing.
- Recognition of the critical importance of creativity and digital skills for future workforces is growing globally. In WA the "FUTURE OF WORK INSTITUTE'S – SKILLS REPORT" ranked creativity and digital skills as two of the top 3 skills for the future.
- In addition to access to training, R&D is critical to enable the construction sector to move in new directions to address current challenges. At present there is no funding support for R&D in the design sector. A small contribution to research could make substantial improvements in safety, innovation, efficiency and effectiveness. The review of the BCITF also provides this opportunity.
- Not only do we need to be more creative and smarter about the way we deliver the housing we need for the future, we need better skilled labour. This was recognised by the State Government in the "Building Better reform package" released last year.
- Better buildings start on the drawing board with high quality documentation. This takes skills and training.
- As the old adage goes "You can use an eraser on the drafting table or a sledgehammer on the construction site." High quality documentation and contract administration protects all parties, resulting in fewer variations. Incomplete and substandard documentation ultimately leads to more variations and an increase in the overall project cost and delivery time. (Refer CSIRO Report by Paul Tilley and Stephen McFallan, DESIGN AND DOCUMENTATION QUALITY AND ITS IMPACT ON THE CONSTRUCTION PROCESS, 2000)
- Architects and engineers are a critical part of the construction sector.
- Architects and engineers together with other essential building consultants and subcontractors such as: building surveyors, fire services consultants and building fabricators (e.g. modular buildings built in factories) are currently excluded from the definition of "building and construction industry" under the Building and Construction Industry Training Fund and Levy Collection Act 1990 (which references the meaning of "construction industry" in the Construction Industry Portable Paid Long Service Leave Act 1985).
- The current definition focuses on works carried out "on site" only. This leaves a large gap in relation to innovation and prefabricated construction by "off-site" workers – the workers of the future.



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- We note that prior to 1997, funds collected by the BCITF were made available to the architects and other design professionals for training purposes. However, since that date, inadvertent amendments to the BCITF legislation in 1997/98 prevented had the unintended effect of effectively excluding architects and other design professionals from being defined as part of the building construction industry, and therefore from being able to access funds from the BCITF.

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