

Please note: this document is a preview of the survey only and is not for submitting feedback. To submit feedback, please complete the online survey on the ABCB [Consultation Hub](#) website.

Overview

About the consultation

The Australian Building Codes Board (ABCB) has received multiple Proposals for Change (PFCs) expressing concern about the adequacy of NCC provisions for female sanitary facilities. Consequently, the ABCB is proposing Deemed-to-Satisfy (DTS) Provisions for the next edition of the NCC, which will increase the number of closet pans for female patrons in Class 9b buildings – single auditorium theatres and cinemas.

An analysis of the impacts (both costs and benefits) of the proposed provisions is now open for comment.

This impact analysis has been developed by the ABCB Office in accordance with the [Regulatory Impact Analysis Guide for Ministers' Meetings and National Standard Setting Bodies](#). <<https://obpr.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national>> administered by the Commonwealth Office of Impact Analysis (OIA).

Why your views matter

The views of stakeholders are fundamental to ensuring the impact analysis is based on the best available information. Questions have been included to guide your responses on specific matters where more information would be particularly helpful in developing the final impact analysis report.

Providing comment

This consultation is open for responses until **11:59PM AEST Monday 1 July 2024**. In line with the ABCB's procedures for undertaking public consultation, comment will only be accepted through the ABCB's online Consultation Hub.

Privacy Collection Statement

1 Important: Please ensure that you have read and understood the below statements before proceeding

Privacy Collection Statement

The Australian Building Codes Board (ABCB) is bound by the Australian Privacy Principles (APPs) outlined in Schedule 1 of the *Privacy Act 1988* (Cth) (Privacy Act), which regulates how entities may collect, use, disclose and store personal information.

Your personal and sensitive information is being collected by the ABCB Office to assist the ABCB to carry out its functions, to inform the consultation process and for other purposes including to communicate with individuals or organisations about their submission.

The personal and sensitive information collected as part of the submission process may be disclosed to and used by the following individuals or organisations:

- the Department of Industry, Science and Resources or the ABCB Office, and the staff of the Department and the ABCB Office;
- the ABCB, its committees and any working groups established by the ABCB, and their staff and advisors;
- the Commonwealth Government, and State and Territory Ministers responsible for building regulation and policy, and their staff and advisors;
- other Commonwealth or State and Territory government departments and agencies;
- any consultant or contractor engaged by the ABCB for the purpose of undertaking work in respect of the subject matter of the submission process.
- any organisation for any authorised purpose with your express consent, for the purposes set out above.

Personal and sensitive information obtained will be stored and held in accordance with the ABCB's obligations under the *Archives Act 1983* (Cth). Further information about how the ABCB collects, uses and discloses personal information is set out in its [Privacy Policy](#) <<https://www.abcb.gov.au/privacy-policy>> .

If you have an enquiry or request relating to your personal information, please contact:

Privacy Contact Officer
Australian Building Codes Board
GPO Box 2013
Canberra ACT 2601



Confidential Information Statement

All submissions and comments will be published unless they are marked 'commercial-in-confidence'. However, any contact details you provide within your submission will be redacted prior to the submission being published.

In order to promote debate and transparency, the ABCB prefers that all submissions and comments be provided in a way that does not require confidentiality to be maintained. However, it recognises that in some circumstances you may want to provide information in confidence.

It is the responsibility of the person making the submission to ensure that any 'commercial-in-confidence' information is clearly identified. Please consider if you can structure your response to keep only some parts confidential. If only part of your submission is confidential, you can provide the confidential part as a separate submission so that the ABCB can publish the non-confidential part of the submission.

Where confidentiality is requested for an entire submission, it will not be published by the ABCB, nor will your name or organisation details; however, see the comments below regarding Impact Analysis.

Please note that we may still disclose the confidential part of your submission to any of the above identified users of the information as part of the consultation process and we will use reasonable efforts to ensure that the recipients keep the submission confidential.

Submissions for Impact Analysis will be made public in accordance with the Office of Impact Analysis' [Regulatory Impact Analysis Guide for Ministers' Meetings and National Standard Setting Bodies](https://oia.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national) <<https://oia.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national>> .

The ABCB or the ABCB Office may also disclose confidential information in circumstances where:

- we are required or authorised by law disclose it;
- you agree to the information being disclosed; or
- someone other than you has made the confidential information public.

Your submission, comments, opinions and responses will not be published if the ABCB or the ABCB Office considers that your submission, comments, opinions and responses may contain potentially defamatory statements or other offensive comments.

(Required)

Please select only one item

Yes, I have read and understood the privacy collection statement.

2 By making a submission on this consultation you agree to the collection of the information you provide in your submission; and the use and disclosure of the information you provide in your submission as outlined above.

(Required)

Please select only one item

- Publish response
- Publish response anonymously (this will remove personal identifiers including, name and organisation)
- Do not publish response

Personal Information

3 What is your name?

4 What is your email address?

Enter your email address to automatically receive an acknowledgement email when you submit your response.

(Required)

5 What is the name of your organisation?

If submitting comments as an individual please leave blank.

6 Please select your State or Territory

Please select only one item

- ACT
- NSW
- NT
- Qld
- SA
- Tas
- Vic
- WA



7 Which best describes your industry sector?

Please select all that apply

- Building commercial
- Building residential
- Building commercial and residential
- Building and plumbing products
- Building certification / surveying
- Architecture and design
- Engineering
- Plumbing
- Compliance, testing and accreditation
- Legal and finance
- Specialist - disability access
- Specialist - energy efficiency
- Specialist - fire safety
- Specialist - health
- Specialist - hydraulic / plumbing
- Students / apprentices
- Trades and other construction services
- Education
- Community and non-government organisations
- Government
- General public
- Other

If other, please specify

Understanding and quantifying the problem (pages 8 to 10)

8 Does the impact analysis adequately identify and define the problem in relation to the adequacy of female public sanitary facilities?

Please select only one item

- Yes
- No (please explain your answer below)
- Unsure

If no, please choose from the list below:

Please select all that apply

- Not enough evidence
- Problem is overstated
- Problem is understated
- There is other problem not considered in the report
- Other reason

Please provide additional information below to support your response.

9 Long queues are most prominent where there are large peak-use times, particularly in relation to intermission periods in theatres and cinemas. Do you agree with this statement?

Please select only one item

- Yes
- No (please explain your answer below)
- Unsure

If no, please provide the reasons / evidence to support your answer below:

10 Are there any other factors that contribute to the inadequacy of female public sanitary facilities in single auditorium theatres or cinemas?

Please select only one item

- Yes
- No
- Unsure

Objectives of intervention and Options (pages 11 to 13)

11 Are the objectives stated in this impact analysis report appropriate for the proposed provisions for sanitary facilities for female patrons?

Please select only one item

- Yes
- No (please explain your answer below)
- Unsure

If no, please explain your answer and provide additional evidence below:

Cost-Benefit Analysis (pages 13 to 18)

12 Do you agree with the approach to measuring the costs and benefits of each option (including the input assumptions/parameters used)?

Please select only one item

- Yes
- No (please explain your answer below)
- Unsure

Please indicate what alternative parameters you suggest be considered below.

13 Are there any (positive or negative) impacts that have not been adequately covered in the cost-benefit analysis?

Please select only one item

- Yes
- No
- Unsure

Please explain your answer and provide additional evidence below:

14 Apart from installation, construction, cleaning and maintenance costs, are there any additional costs likely to be required in order to provide more closet pans in accordance with the regulatory options (Options 2)?

Please select only one item

- Yes (please explain your answer below)
- No
- Unsure

If yes, please clearly provide information for your response.

15 The cost-benefit methodology uses a survey by the Royal Melbourne Institute of Technology (1994) to estimate the expected waiting times. Are you aware of more recent information/data?

Please select only one item

- Yes
- No (please explain your answer below)
- Unsure

If yes, please provide the relevant information:

16 Do you have any other evidence that would make the estimates in the analysis more robust?

Please select only one item

- Yes (please explain your answer below)
- No

If yes, please explain your answer and provide additional evidence below:

17 Do you have any feedback on the cost-benefit analysis results on the proposed options?

Please select only one item

- Yes (please explain your answer below)
- No

If yes, please explain your answer and provide additional evidence below:

18 Are there any other comments you would like to make in relation to this analysis?

Please select only one item

- Yes
- No

Additional comments

Please attach a copy of any documents you wish to include to this printout.

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