

5 September 2022

Mr Paul Baxter BBS, EFO, FIFireE, NZIM  
Commissioner  
Fire and Rescue NSW  
1 Amarina Avenue  
Greenacre NSW 2190

Via email: [info@fire.nsw.gov.au](mailto:info@fire.nsw.gov.au)

Dear Commissioner

**RE: Lack of resources within FRNSW to implement PBDB position statement**

I write regarding Fire and Rescue NSW's (FRNSW) [position statement](#) concerning relevant stakeholders to be consulted in the performance-based design brief (PBDB) and to follow up my previous correspondence on the matter.

The Association of Australian Certifiers (AAC) is the peak body for registered certifiers employed in private practice and local government in NSW.

We remain concerned that FRNSW does not have the necessary resources to be able to implement this position statement. This is having a detrimental impact on registered certifiers and their clients.

As registered certifiers, our members are focussed on assessing projects against the National Construction Code and their statutory obligations, but they cannot do this in relation to FRNSW's position statement because of a lack of resourcing that is out of their control.

I first raised this matter with you in correspondence on 28 September 2021 and our members are still reporting the same issues due to a lack of resources in FRNSW to implement the position statement.

This continues to not meet the public's expectations and we therefore respectfully request that more resources are applied, or an exemption is considered until resourcing can be increased.

I would greatly appreciate your consideration of this matter, and I look forward to hearing from you.

If you would like to discuss this matter further, please do not hesitate to contact me on 0431 082 259.

Yours sincerely



Jill Brookfield  
Chief Executive Officer