

# COMMENTS ON SACAP'S

**1. Recognition of Prior Learning (RPL)**

**2. Continuing Professional Development (CPD)**

**3. Identification of Work (IDoW)**



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A SACAP RECOGNISED  
VOLUNTARY ASSOCIATION

VAT Reg N°: 4120228061

**Building Professionals to Build the Future!**

## **PURPOSE**

The South African Institute of Architectural Technologists (SAIAT) was requested by the South African Council for the Architectural Profession (SACAP) to submit *comments* on the proposed drafts of the documents listed below as SACAP Council has already *approved* the draft documents and need the comments from the Voluntary Associations before publishing the said documents in the Government Gazette<sup>1</sup>.

The documents referred to are:

1. Recognition of Prior Learning (RPL)
2. Continuing Professional Development (CPD)
3. Identification of Work (IDoW)

## **BACKGROUND**

SAIAT requested permission from SACAP to disclose these documents to their members on 05 June 2015<sup>2</sup>.

The following answer was received from SACAP via Pappie Maja on 05 June 2015:

*“Please note that this is the first stage of the proposed draft documents. We expect only VAs to comment and thereafter we will be sending this for public comments. This is the stage where we will expect public members and professionals to comment. We therefore cannot distribute this to any member until such time comes”*

However, notifications were received from SAIAT members that these documents were also published for comment on the SACAP website ([www.sacapsa.com](http://www.sacapsa.com)) – which then is in contradiction to the above. An enquiry regarding this on the same day to Pappie Maja from SACAP still remains unanswered.

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<sup>1</sup> Letter attached as Annexure A

<sup>2</sup> E-mail attached as Annexure B

## **SAIAT**

SAIAT is a voluntary association recognised in terms of The Architectural Profession Act (Act 44 of 2000) by SACAP.

Current active membership is 975 with only 15 not registered with SACAP.

## **THE COUNCIL FOR THE BUILT ENVIRONMENT ACT (ACT 43 OF 2000)**

The Council for the Built Environment Act (Act 43 of 2000) as per Section 3 state the following as some of the objects of the council:

### *3. Objects of council*

*The objects of the council are to -*

- (a) promote and protect the interests of the public in the built environment;*
- (b) promote and maintain a sustainable built environment and natural environment;*
- (c) promote ongoing human resource development in the built environment;*
- (d) facilitate participation by the built environment professions in integrated development in the context of national goals;*
- (e) promote appropriate standards of health, safety and environmental protection within the built environment;*
- (f) promote sound governance of the built environment professions;*
- (g) promote liaison in the built environment in the field of training, both in the Republic and elsewhere, and to promote the standards of such training in the Republic;*
- (h) serve as a forum where the representatives of the built environment professions may discuss the relevant -*
  - (i) required qualifications;*
  - (ii) standards of education;*
  - (iii) training and competence;*
  - (iv) promotion of professional status; and*
  - (v) legislation impacting on the built environment; and*
- (i) ensure the uniform application of norms and guidelines set by the councils for the professions throughout the built environment.*

Of specific note here are clauses 3(b) and 3(i).

Section 4 of the Act deals with the functions, powers and duties of Council and relevant to this document is Clause 4(k):

- (k) *ensure the consistent application of policy by the councils for the professions with regard to -*
- (i) accreditation;*
  - (ii) the registration of different categories of registered persons;*
  - (iii) key elements of competence testing of registered persons;*
  - (iv) codes of conduct to be prescribed by the councils for the professions;*
  - (v) the principles upon which the councils for the professions must base the determination of fees which registered persons are entitled to charge in terms of any of the professions' Acts, and in accordance with any legislation relating to the promotion of competition;*
  - (vi) standards of health, safety and environmental protection within the built environment;*
  - (vii) the recognition of voluntary associations for the built environment professions, by approving the framework for that recognition submitted by the councils for the professions, taking due cognisance of the characteristics of each built environment profession.*

Section 20 is also relevant:

#### *20. Identification of work*

- (1) *The council must, after receipt of the recommendations of the councils for the professions submitted to it in terms of the professions' Acts, and before liaising with the Competition Commission in terms of section 4 (q) -*
- (a) determine policy with regard to the identification of work for the different categories of registered persons;*
  - (b) consult with any person, body or industry that may be affected by the identification of work in terms of this section.*
- (2) *The council must, after consultation with the Competition Commission, and in consultation with the councils for the professions, identify the scope of work for every category of registered persons.*

**THE SOUTH AFRICAN ARCHITECTURAL PROFESSIONS ACT (ACT 44 OF 2000)**

The following Clauses have relevance to this document:

*22. Renewal of registration*

- (1) A registered person must, at least three months prior to the prescribed expiry date of his or her registration, apply in the prescribed manner to the council for the renewal of his or her registration.*
- (2) The council may determine conditions for the renewal of registration.*
- (3) Subject to section 19, the council must, on application, register a person who was previously registered and whose registration was cancelled in terms of section 20 (1)(a)(iii), if he or she has paid -*
  - (a) the prescribed fee;*
  - (b) any arrear annual fee or portion thereof;*
  - (c) any expenses incurred by the council in connection with the recovery of any arrear fees; and*
  - (d) any penalties imposed on him or her by the council.*

*26. Identification of work*

- (1) The council must consult with -*
  - (a) all voluntary associations;*
  - (b) any person;*
  - (c) any body; or*
  - (d) any industry,*

*that may be affected by any laws regulating the built environment professions regarding the identification of the type of architectural work which may be performed by persons registered in any of the categories referred to in section 18, including work which may fall within the scope*

*of any other profession regulated by the professions' Acts referred to in the Council for the Built Environment Act, 2000.*

- (2) *After the process of consultation the council must submit recommendations to the CBE regarding the work identified in terms of subsection (1), for its consideration and identification in terms of section 20 of the Council for the Built Environment Act, 2000.*

### 36. Rules

- (1) *The council may, by notice in the Gazette, make rules with regard to any matter that is required or permitted to be prescribed in terms of this Act and any other matter for the better execution of this Act or in relation to any power granted or duty imposed by this Act.*
- (2) (a) *Before the council makes any rule under this section, it must publish a draft of the proposed rule in the Gazette together with a notice calling on interested persons to comment in writing within a period stated in the notice, but the period may not be less than 30 days from the date of publication of the notice.*
- (b) *If the council alters the draft rules as a result of any comment it need not publish those alterations before making the rule.*
- (3) *The council may, if circumstances necessitate the immediate publication of a rule, publish that rule without consultation as contemplated in subsection (2), provided that the CBE, any of the councils for the professions or any person who is aggrieved by the said rule may -*
- (a) *comment after such publication; or*
- (b) *appeal to the CBE or the appropriate High Court, as the case may be, against such a rule.*

## **THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA (ACT 108 OF 1996)**

The following Clauses have relevance to this document:

### *8 Application*

- (1) *The Bill of Rights applies to all law, and binds the legislature, the executive, the judiciary and all organs of state.*

### *9 Equality*

- (1) *Everyone is equal before the law and has the right to equal protection and benefit of the law.*
- (2) *Equality includes the full and equal enjoyment of all rights and freedoms. To promote the achievement of equality, legislative and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination may be taken.*

### *22 Freedom of trade, occupation and profession*

- Every citizen has the right to choose their trade, occupation or profession freely. The practice of a trade, occupation or profession may be regulated by law.*

### *33 Just administrative action*

- (1) *Everyone has the right to administrative action that is lawful, reasonable and procedurally fair.*
- (2) *Everyone whose rights have been adversely affected by administrative action has the right to be given written reasons.*
- (3) *National legislation must be enacted to give effect to these rights, and must-*
- (a) provide for the review of administrative action by a court or, where appropriate, an independent and impartial tribunal;*
  - (b) impose a duty on the state to give effect to the rights in subsections (1) and (2); and*
  - (c) promote an efficient administration.*

## COMMENTS

### 1. SACAP is required by law to Consult with Voluntary Associations

It is with regret that SAIAT has to inform SACAP that in terms of the quoted sections of the relevant acts that the VAs were not consulted as required by law.

SAIAT had two meetings with the registrar of SACAP in 2014 where this concern was raised:

10 July 2014:

Present at this meeting was the SACAP Registrar, ms Marella O'Reilly, SACAP President Councillor Yashaen Luckan and SAIAT President Frans Dekker.

SAIAT raised their concern of the lack of VA representation on the various committees and sub-committees of SACAP where previously the required consultation with the VAs occurred.

SAIAT was assured that in future VAs will be consulted in a forum such as a "bosberaad" and the first one was scheduled for September 2014. According to the Registrar then VAs will be informed of this very soon.

Councillor Luckan also elaborated that he as President of SACAP will establish a forum between himself and the presidents of the VAs.

15 December 2014:

Present at this meeting was the SACAP Registrar, ms Marella O'Reilly, SAIAT President Frans Dekker and SAIAT Vice President Peter Brown.



SAIAT has requested this meeting to again voice their concern about the lack of consultation with the VAs as well as the lack of continuity that are evident in the constitution of the new committees and sub-committees.

At this meeting Peter Brown emphasize the fact that SACAP has to in terms of Act 44 of 2000 consult with VAs – this remark was made due to the fact that rumours were going around regarding drastic changes to some of the rules as previously published by SACAP.

SAIAT was again assured that proper consultation will take place. Frans Dekker then enquire if it was possible for a VA to request to present to a committee or sub-committee, especially the CPD Committee, and ms O'Reilly said that all it needs is to put a formal request to her office.

#### Request to address the CPD Committee

SAIAT as per above then submitted a formal request to address the CPD Committee on 05 May 2015. The email was acknowledged but to date no further confirmation received.

## 2. Policies vs Rules

### Identification of Work:

In terms of the CBE Act the CBE is task to determine policies and in terms of the Architectural Profession Act SACAP may publish rules.

When SACAP publish their first Interim Policy on IDoW, SAIAT is aware of the fact that SACAP was requested by the CBE to withdraw the Policy and to replace it with an Interim Rule. This issue created much debate and obvious delays.

In the preamble to the proposed Board Notice on IDoW SACAP again uses the word “policy” instead of “rule”.

Further, the same wording is used as per the previous Board Notice – and hereby contribute to the illusion that VAs et al were indeed consulted which in this case is not true.

It is also stated that the publication will be in accordance with Section 36(3) of the Act. With the previous publication of the Interim Rule the use of this section was appropriate as there was indeed a legal difference of interpretation regarding the old Architect's Act 500m<sup>2</sup> rule. In this case there is a rule in place and in SAIAT's opinion the rule is accepted by the majority of RPs and the public. To publish a new rule (or policy as per SACAP) under this section is therefore not justified, so far more so if the lack of consultation is taken into consideration.

It is also unclear what the intend of this publication will be: is it to replace the IDoW Policy forwarded by the CBE to the Competitions Commissioner as is it merely an interim rule?

In both cases SAIAT believe that the due process of the law was not followed.

### 3. Consultation vs Comment

The process of consultation is defined in most dictionaries as an act of consulting, through a meeting for deliberation, discussion, or decision. This is evident in most of the consultation processes by government where stakeholders are invited to a meeting where the deliberations then happen.

The process of comment is defined in most dictionaries as an act of explanatory or critical matter added to a text or document.

The process by SACAP to publish then documents on their website or forward such documents to stakeholders are therefore not recognised by this VA as a consultation process as required by law.

#### 4. Publication on Website vs Publication in Government Gazette

In reading the documents is not clear if SACAP has published these documents for input before publication as a draft in the Government Gazette and then invite for comments again, or if this process is seen as the comment process.

The Architectural Act does require SACAP to publish all rules first as a Draft Board Notice for public comment and then after all comments were considered to publish the final Board Notice. Clause 36(3) does allow SACAP to publish a rule under certain conditions without a draft.

The Architectural Profession Act does not mandate SACAP in any way to publish for comment on their website and then thereafter the final Board Notice in the Government Gazette.

#### 5. Notice given to RPs and Stakeholders

Although there is no legal requirement that SACAP must give notice of such publications of draft documents in the Government Gazette, it is not clear what the situation is if published on the website. In dealings with several RPs it became evident that the majority were unaware of such publications.

As a VA SAIAT has received on 29 June 2015 a Word Copy of the SACAP E-newsletter in which it was apparently printed. An email such on several RPs email only showed the latest edition received by email was edition 3 in March 2015. If it is now only printed on the website no RP or VA to our knowledge have received such notification.

## 6. Memorandum of Understanding

A Memorandum of Understanding was signed between SACAP and all the VAs in 2010<sup>3</sup>.

Some of the Objectives listed in this MOU are as follow:

- Fostering collaborative relationships and mutual co-operation
- Regular combined meetings (“bosberade”)
- Ongoing communication between parties is to be maintained
- Establishing lines of communication between the respective parties to facilitate co-operation in respect of administrative and strategic issues

Some of SACAPs obligation as listed are:

- To interact with VAs
- To incentivise the membership of VAs

No review of this MOU was done to SAIATs knowledge – SACAP in in email to VAs in requesting information from the VAs on 24 October 2014 actually acknowledged that this MOU was still valid.<sup>4</sup>

Regrettably it appears to SAIAT that in producing these documents published for comments SACAP has disregarded the importance of co-operation with the VAs.

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<sup>3</sup> Attached as Annexure C

<sup>4</sup> Attached as Annexure D

## **CONCLUSION**

SAIAT, as a Voluntary Association recognised by SACAP in terms of Section 25 of The Architectural Profession Act, ***do hereby not recognise the validity of the following documents and their associated sections:***

- Recognition of Prior Learning (RPL)
- Identification of Work
- Conditions Relating to Continuing Professional Development and Renewal of Registration

as official draft documents to be published by SACAP due to the following reasons:

- No proper consultation as required by The CBE Act, The Architectural Profession Act and The Memorandum of Understanding between SACAP and the VAs.

**As a result SAIAT has to refrain from officially provide comments on the said documents as they have no legal status and request SACAP to engage in a proper consultation process as required.**

**SACAP is hereby also requested to comply with the terms of the said Act and MOU and therefore withdraw these documents in lieu of the above.**

However, SAIAT will attached some comments as annexures to this document, however these comments in the annexures may not be construed by any party that SAIAT is actually recognising the said documents in their current stage.

For and on behalf of the National Executive  
of the South African Institute of Architectural Technologists

**FRANS J A DEKKER**  
President

## **COMMENTS ON THE IDoW**

The proposed IDoW creates a greater exclusion of work than the current IDoW (and when considered against the original 500m<sup>2</sup> restriction) with the associated impact on professionals and the building industry<sup>5</sup>

- There has been a lack of industry and professional consultation in the development of the IDoW;
- There has been a lack of direct notification to professionals affected by the proposal;
- The development of the proposed IDoW appears to be an academic exercise without due regard of the current IDoW and permitted work undertaken by various registration categories;
- The development of the proposed IDoW fails to take account of how a large segment of the profession, owners and developers operate within the building industry;
- The proposed IDoW will have undue financial implications for owners due to the exclusionary nature of work permitted;
- The exclusionary nature of the proposal will create a business environment conducive to questionable practices (greater than currently exist where professionals undertake work outside of their categories of registration) to ensure that the livelihood of professionals is not lost or negatively impacted on;

Implementation and monitoring of the IDoW is also not clearly identified. As with the current system of forms an over reliance on local authorities to monitor and restrict appointments is problematic due to such being outside of their direct competence and means to carry out such function.

Members of SAIAT have indicated that if this IDoW is published they will have no choice of leaving the industry as their current means of making a living will be compromised – an action that is in contradiction with the RSA Constitution.

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<sup>5</sup> See Annexure E

## **COMMENTS ON THE CPD CONDITIONS**

- There has been a lack of industry and professional consultation in the development of the CPD policy;
- There has been a lack of direct notification of professionals affected by the proposal;
- The policy proposal has the implications of additional costs for "one-man" businesses compared with current system;
- No provision has been made for turnaround times for SACAP to validate Category 1 CPD providers or CPD courses which will have a negative impact on the creation of ad hoc CPD material for presenters.
- No provision has been made in the CPD policy for ALL current CPD exempted registered professionals to re-apply for such exemptions (this to avoid instances of professionals continuing to practice while being exempted from CPD requirements).

The current conditions allow VAs to validate their own as well as third party provider CPD events. No valid reason is given why this function is not kept with the VAs.

It should be noted that VAs engaged into contracts with third party providers for the provision of CPD workshops. Since 2007 there exist a sort of MOU between SAIA and SAIAT that third party validations will be valid for a period of three years. This is well known to SACAP as SACAP has copies of Constitutions Regulations and Byelaws of the respective VAs. This action can be seen as an administrative action in terms of the Constitution of the RSA by a statutory body that now will restrict or take away previous rights of entities and therefore be not constitutional.

There is no clear indication on how the different CPD credits can be obtained – just the minimum per year. Further, some careful attention should be taken regarding some of these proposals as they in itself are unconstitutional – 4 credits needs to be obtained by working which equates to 1 600 / 1 880 available hours per year. No provision for sick leave or any other type of absence from work is provided for. Further, how to make a living is a constitutional right and no statutory body can force a private individual to work a certain minimum hours.



The current conditions allow a maximum of two credits but it is not mandatory. SAIAT believe that the objective of CPD will not be obtained by increasing the number of credits in this case as to be merely fulfilling ones daily task do not necessarily contribute to any further learning.

With the proper consultation process SAIAT is of the opinion that CPD validation can remain with the VAs with a more focussed monitoring thereof by SACAP. The proposal is also against the MOU conditions – SACAP is supposed to assist the VAs and to incentivise VA membership.

The fact that CPD credits cannot any more obtained by VA membership is also against the provisions of the MOU.





SOUTH AFRICAN COUNCIL  
for the  
ARCHITECTURAL PROFESSION

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**04 June 2015**

**The President  
South African Institute of Architectural Technologists  
PO Box 807  
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2008**

Dear Mr Frans Dekker

**Comments: Recognition of Prior Learning (RPL)  
Continuing Professional Development (CPD)  
Identification of Work (IDoW)**

Please note that SACAP Council resolved to approve the draft documents of the Recognition of Prior Learning (RPL), Continuing Professional Development (CPD) and Identification of Work (IDoW). We hereby invite voluntary associations to submit comments on the following proposed drafts before they could be gazetted:

- **Continuing Professional Development (CPD)**
- **Identification of Works (IDoW)**
- **IDoW Risks involved in work done by other categories**
- **Alignment of SANS Occupancies and Complexity Ratings**
- **RPL Assessment: Guidelines for Applicants**
- **RPL Assessment: Guidelines for Assessment Panels**

Please forward your submissions as recognised voluntary association to the attention of the Registrar on: [comments@sacapsa.com](mailto:comments@sacapsa.com). The submissions should reach us on or before Monday, 6 July 2015. Kindly note that late submissions will not be accepted.

Kind regards,

.....  
**Ms Barbara van Stade  
Chief Operations Officer**



**From:** [Pappie Maja](#)  
**To:** [SAIAT ADFIN](#)  
**Cc:** [sandi@saiat.org.za](mailto:sandi@saiat.org.za); [vicepresident@saiat.org.za](mailto:vicepresident@saiat.org.za); [Marella O'Reilly](#); [Barbara van Stade](#)  
**Subject:** RE: DRAFT DOCUMENTS  
**Date:** 05 June 2015 09:14:23 AM  
**Attachments:** [image003.png](#)

Dear Frans Dekker,

Thank you for the query. Please note that this is the first stage of the proposed draft documents. We expect only VAs to comment and thereafter we will be sending this for public comments. This is the stage where we will expect public members and professionals to comment. We therefore cannot distribute this to any member until such time comes.

Kind regards,

Pappie Maja  
 Senior Manager: Corporate Communications and Stakeholder Relations (CSR)  
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**From:** SAIAT ADFIN [mailto:adfin@saiat.org.za]  
**Sent:** 05 June 2015 07:02 AM  
**To:** Pappie Maja  
**Cc:** sandi@saiat.org.za; vicepresident@saiat.org.za  
**Subject:** DRAFT DOCUMENTS



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The South African Institute of Architectural Technologists  
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A SACAP RECOGNISED  
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**Building Professionals to Build the Future!**

We thank you for forwarding these documents to us. To enable us to provide comprehensive comments on these documents we have to consult our membership.

Can you please indicate before end of today if you can distribute these documents via email to

our members for their comment?

Regards

**FRANS DEKKER**

*President*

*Finance & Administration*

*CPD*

**MEMORANDUM OF UNDERSTANDING**

(Herein referred to as the MOU)

Entered into between:

**1. Parties**

**South African Council for the Architectural Profession**

(Herein referred to as SACAP)

And

**Recognised Voluntary Associations**

(Herein referred to as VAs)

The following are VAs recognised by SACAP:

- (i) Border Kei Institute of Architects(BKIA);
- (ii) Cape Institute for Architecture (CIA);
- (iii) Eastern Cape Institute of Architects (ECIA);
- (iv) Free State Institute of Architects (FSIA);
- (v) Gauteng Institute for Architecture (GIfA);
- (vi) South African Institute of the Interior Design Professions (IID);
- (vii) KwaZulu Natal Institute for Architecture(KZNIA);
- (viii) Pretoria Institute for Architecture (PIA);
- (ix) South African Institute of Architects (SAIA);
- (x) South African Institute of Architectural Technologists(SAIAT);
- (xi) South African Institute for Building Design (SAIBD);
- (xii) South African Institute of Draughting (SAID);

**2. Objectives**

- 2.1 Administering the requirements of the Act, following both the letter and spirit thereof;
- 2.2 Promoting the development of the Architectural Profession in line with the spirit of the South African Constitution;
- 2.3 Clarifying and defining the roles of the respective parties in the realisation of the following vision:

“Highly competent architectural professionals compliant with international Best practice and serving the special needs of developing economies”.

- 2.4 Partnering to achieve a competent and informed profession;
- 2.5 Operationally ensuring excellence in performance and service delivery;
- 2.6 Fostering collaborative relationships and mutual co-operation;
- 2.7 Maintaining a sustainable skills base of high quality for the profession;
- 2.8 Promoting transformation and unity in diversity within the built environment (as per Schedule “8”);
- 2.9 Growing the information and knowledge hub and embracing indigenous knowledge systems;
- 2.10 Establishing lines of communication between the respective parties to facilitate co-operation in respect of administrative and strategic issues , including the maintenance of reliable, integrated registration and membership information, in the interest of promoting the architectural profession; and
- 2.11 Promoting co-operation, transparency, accountability, best business practices and sound corporate governance;

### **3. Implementation of Objectives**

The following are guidelines to implement the objectives:

- 3.1 Regular combined meetings (as per schedule “2”);
- 3.2 Workshops to be attended by appropriate designated representatives of SACAP and VAs;
- 3.3 Regular reports to be submitted including assessment, review and ongoing monitoring and evaluation (as per schedule “3”);
- 3.4 Ongoing communication between the parties is to be maintained, (as per Schedule “3”) to ensure transparency, respect, accountability, courtesy, professionalism and integrity;

- 3.5 Registered professionals to be provided with sufficient support and access to CPD category one (1) so as activities to comply with registration renewal requirements of the Act. (as per Schedule “5”);

#### **4. Duties and Obligations of SACAP**

- 4.1 To determine and administer the task of registering professionals in terms of the requirements of the Act, including the maintenance of records in respect of all categories of registration;
- 4.2 To determine and collect registration fees, including acknowledgement and recording thereof;
- 4.3 To maintain regulatory authority in terms of the Code of Professional Conduct (CPC);
- 4.4 To liaise with the VAs to align the CPC of SACAP with those of the VAs and vice versa;
- 4.5 To publicise generally, including to government departments and local authorities, both the existence of the Act as well as the basic legal requirements thereof;
- 4.6 To promote the provisions implicit in the Identification of Work Framework and to publicise the legal requirements thereof to all relevant parties, as and when such comes into force;
- 4.7 To interact with VAs and provide support to the architectural profession in terms of Marketing CPD activities among other things related to the Profession;  
(as per Schedule “5”);
- 4.8 To ensure that SACAP will endeavour to support capacity building of VAs to ensure robust participation in policy processes and SACAP structures;
- 4.9 To incentivise the membership drives of VAs;
- 4.10 To set and promote standards for education requirement.

## **5. Duties and Obligations of VAs**

- 5.1 To promote professional excellence of architectural practitioners amongst their membership;
- 5.2 To assist their members and registered professionals in obtaining the required CPD category one (1) credits by providing, promoting, organising and validating CPD activities and the maintaining of records thereof (as per Schedule "5");
- 5.3 To liaise with SACAP on all CPD issues including regular submission of reports and records; (as per Schedule "5");
- 5.4 To inform SACAP of any person, including any member, who may be undertaking architectural work without being appropriately registered;
- 5.5 To maintain a sound Constitution, including a Ethics/Code of Professional Conduct (CPC) and to liaise with SACAP to ensure alignment with the SACAP's CPC;
- 5.6 To inform SACAP regularly ( at least annually ) of structures of the VA with respect to membership, office bearers and contact details;
- 5.7 To assist SACAP in the implementation of rebates for members of the VAs by ensuring that the VA is a recognised VA of SACAP and maintaining its compliance with recognition criteria, (as per Schedule "2"); and
- 5.8 To ensure that their members understand SACAP's role as a statutory regulatory body, as distinct from the role of the VA's.

## **6. Confidentiality**

See Schedule "7".

## **7. Cession , Assignment and Delegation**

- 7.1) the parties shall not cede delegate or assign any of its rights and/or obligations in terms of this MOU to any third party, at any time of its duration.
- 7.2) Members of VAs may not act on behalf of SACAP in any capacity unless specifically or authorised and delegated to do so by the Registrar of SACAP in writing.

## 8. Variation

No alteration, variation or cancellation of this MOU shall be of any force or effect unless recorded in writing in a formal addendum hereto and signed (at the time) by duly authorised representatives of the parties in compliance with any delegation of authority policies existent and applicable to and within the parties.

## 9. Non Compliance

Should the VA not be able to comply with Section 25 of the Architectural Profession Act? 44, 2000, then this MOU between the SACAP and the offending party shall terminate.

## 11. Settlement of Disputes

Should a dispute arise between the parties as a result of this MOU, the dispute shall be Resolved through negotiation and mediation.

## 12. Review/Duration of the Agreement

The duration of this MOU shall be reviewed from time to time as may be necessary at least every three (3) years.

## 13. Signatories

Any person who signs would be presumed to be duly authorised representatives of the VA in compliance with any delegation of authority.

Dorothy Brislin

(Registrar) SACAP

Lakeside Place

cnr Ernest Oppenheimer

Queen Street

Bruma Lake

2026

Date: \_\_\_\_\_

Name : \_\_\_\_\_

SAIAT

5<sup>th</sup> Floor Sovereign House

cnr Sovereign House /

Mullins Street

Bedfordview

2008

Date: \_\_\_\_\_



Name: \_\_\_\_\_

BKIA  
10 Beacon Park  
cnr Beaconsfield Drive /  
Bonza Bay Road  
Beacon Bay  
5241

Date: \_\_\_\_\_

Name: \_\_\_\_\_

CIA  
71 Hout Street  
Ground Floor  
Cape Town  
8001

Date: \_\_\_\_\_

Name: \_\_\_\_\_

IID  
Suite 124  
First Floor, Design Quarter  
Leslie Avenue  
Fourways  
2055

Date: \_\_\_\_\_

Name: \_\_\_\_\_

PIA  
341 Brooklyn Road  
Cnr Brooklyn Road and  
Charles Street  
Brooklyn  
0001

Date: \_\_\_\_\_

Name: \_\_\_\_\_

SAIA  
Bouhof  
31 Robin hood Road  
Robindale  
Randburg  
2125

Date: \_\_\_\_\_

Name: \_\_\_\_\_

SAID  
Unit C24  
Pinelands Business Park  
New Mill Road  
Pinelands  
7405

Date: \_\_\_\_\_

Name: \_\_\_\_\_

SAIBD  
113 Musgrave Park  
18 Musgrave Road  
Durban  
4001

Date: \_\_\_\_\_

Name: \_\_\_\_\_

ECIA  
21 Alfred Terrace  
Central  
Port Elizabeth  
6001

Date: \_\_\_\_\_

Name: \_\_\_\_\_

FSIA

Fichardt House  
40 Elizabeth Street

Bloemfontein  
9301

Date: \_\_\_\_\_

Name: \_\_\_\_\_

KZNIA

160 Bulwer Road  
Glenwood

Durban  
4001

Date: \_\_\_\_\_

Name: \_\_\_\_\_

GfA, Holy Family Convent

40 Oxford Road (cnr 3rd Avenue),  
Parktown

2193

Date: \_\_\_\_\_

## **Index of Schedules:**

- Schedule 1: Definitions
- Schedule 2: Meeting
- Schedule 3: Accountability Reports
- Schedule 4: Marketing and Communications
- Schedule 5: Category One CPD Activities
- Schedule 6: SACAP Committee Services
- Schedule 7: Confidentiality and Information Sharing
- Schedule 8: Transformation.

## **Schedule “1”**

### **Definitions**

ACT	-	Architectural Profession Act No. 44, 2000;
BKIA	-	Border Kei Institute of Architects;
CBE	-	Council for the Built Environment;
CIA	-	Cape Institute for Architecture;
CPD	-	Continuing Professional Development;
CPC	-	Code of Professional Conduct;
DPW	-	Department of Public Works;
ECIA	-	Eastern Cape Institute of Architects;
FSIA	-	Free State Institute of Architects;
GIfA	-	Gauteng Institute for Architecture;
KZNIA	-	KwaZulu Natal Institute for Architecture.
IDoW	-	Identification of Work;
IID	-	South African Institute of the Interior Design Professions;
MOU	-	Memorandum of Understanding;
SACAP	-	South Africa Council for the Architectural Profession;
PIA	-	Pretoria Institute for Architecture;
SAIA	-	South African Institute of Architects;
SAIAT	-	South African Institute of Architectural Technologists;
SAIBD	-	South African Institute for Building Design;
SAID	-	South African Institute of Draughting;
RPL	-	Recognition of Prior Learning;
VA	-	Voluntary Association;

## Schedule “2”

### MEETINGS

- a) Biennial Convention of stakeholders in the Architectural Profession to promote robust debate, ensure community of purpose and give leadership, to be held every two years.
- b) Biennial SACAP and VAs Bosberaad to discuss strategic issues and to set common goals, to be held every alternative year.
- c) Quarterly Forum meetings between SACAP and VAs to address ongoing operational and strategic issues of common interest.
- d) Annual CPD Stakeholder Forum in the support of the delivery of category one (1) CPD credit opportunities to the entire profession as well as to ensure monitoring and evaluation of the implementation of CPD policy.

## Schedule “3”

### Accountability/Reports

- a) To supply Council with annual reports reflecting compliance with the statutory provisions.
- b) Annual submission of paid up membership list by a date no later than the 28<sup>th</sup>/29<sup>th</sup> of February of each year.
- c) Paid up, active membership of no less than fifty(50) members with full voting rights, to be verified in annual reporting.
- d) To comply with the CBE legal framework in order to be recognised as a VA and to further comply with conditions associated therewith.
- e) The VAs shall further comply with the Act in terms of Section 25 of the Architectural Profession Act No. 44, 2000 as amended.
- f) All architectural practitioners that are members of VAs are obliged to be registered with SACAP as a condition of membership.
- g) Yearly reviews, monitoring and evaluation of reporting, accountability, in terms of meeting the objectives of the MOU.
- h) All elected office bearers of the VAs are to be registered with SACAP or any other statutory body of the CBE, built environment professional body where applicable.

## Schedule “4”

### MARKETING AND COMMUNICATIONS

- a) SACAP has the capacity to provide communications support to the VAs through its website, newsletter and news flashes which are sent to registered professionals.
- b) VAs to have a page and/or link on SACAP website for publicity and information feeds.
- c) VAs to have links to SACAP website from their own websites to SACAP’s website.
- d) SACAP Newsletter:
  - 1) Newsflash offered to VAs free of charge,
  - 2) CPD Category one(1) activities to be publicised on SACAP website and , CPD calendar,
  - 3) Quick link to the SACAP website,
  - 4) Publication for interested persons.
- e) Events calendars to be shared between SACAP and VAs, with events to be posted on the respective websites.

## Schedule “5”

### CPD ACTIVITIES

To ensure that all registered persons have reasonable access to CPD category one (1) activities.

Ensure adequate and accurate information in respect of implementation of SACAP CPD registration renewal mandate.

### Obligations of VAs

- 1) To provide, promote, organise and validate CPD activities for their members and all registered professionals;
- 2) To ensure CPD validation provides for administrative compliance and accountability which is to be supplied to SACAP;
- 3) To submit all validated category one (1) activities by 30<sup>th</sup> November for the past year, which should include:
  - 3.1 Presenters (and/or) facilitators,
  - 3.2 Credit values for each activity;
- 4) To submit to SACAP Marketing and Communications Unit a calendar of all category one (1) activities preferably three months in advance of an activity for uploading on SACAP website, which should include:
  - 4.1 Date and time,
  - 4.2 Venue,
  - 4.3 Costs,
  - 4.4 CPD credit value,
  - 4.5 Theme/Title of activity,
  - 4.6 Name of facilitator and
  - 4.7 Template to be filled in with all necessary information;
- 5) To ensure that the credit value given to each activity is in line with SACAP prescribed credit rating;
- 6) Ensure that activities cover a reasonable spread of themes and knowledge areas and are in line with SACAP CPD curriculum;
- 7) To submit or ensure submission of attendance registers ( electronically ) to SACAP timeously of an activity and such attendance register to have complete and accurate details of attendances, including SACAP registration numbers;
- 8) To submit details of validated third party providers;
- 9) To ensure that the validated third parties adhere to the minimum code of conduct and who must conform to the principles of non sexism and non racism; and

- 10) To submit to SACAP quarterly reports on all CPD activities that occurred in the previous quarter by the second week of the succeeding quarter with demographic statistics.
- 11) CPD calendar to promote activities.
- 12) CPD category one (1) activities to be distributed monthly.

### **Obligations of SACAP**

- 1) To ensure implementation of the CPD mandate in terms of the Act;
- 2) To regulate CPD requirements and performance of registered persons;
- 3) To review policy from time to time;
- 4) To maintain records with a view to continued registration;
- 5) Report to, DPW, CBE and SACAP on statistical data on CPD category one (1) activities with regard to:
  - 6.1 Validation procedures,
  - 6.2 Validations category one (1) activities,
  - 6.3 Certification,
  - 6.4 Record attendance by registered professionals,
  - 6.5 Annual Compliance and
  - 6.6 Renewal Compliance;
- 6) To provide the VAs with updated CPD Conditions documentation;
- 7) To recognise VAs through the website;
- 8) To advertise on SACAP website CPD category one (1) activities;
- 9) To provide reporting templates;
- 10) To provide curriculum guideline to VAs.



## Schedule “6”

### SACAP COMMITTEE SERVICE

- a) To nominate members to serve on SACAP committees where called for by Council and once elected, such nominated members shall:
1. serve on SACAP committee/s in their personal capacity or shall be mandated VA representative of their respective VA depending on the structure and terms of reference of the particular committee as determined by Council and set out below:
    - a) Council - Minister appointment;
    - b) Exco - Council election;
    - c) Code of Conduct Committee- Council appointment and VA/ category representation;
    - d) Investigating Committee - Council appointment and VA/ category representation;
    - e) Audit and Risk Committee – Council appointment;
    - f) Marketing and Communications Committee – Council appointment;
    - g) CPD Committee - Council appointment and VA mandated representation;
    - h) Education Fund Committee – Council appointment;
    - i) IDoW Committee - Council appointment and VA mandated representation;
    - j) Heads of Schools Committee – Heads of Schools;
    - k) Professional Fees Committee- Council appointment and VA/ category representation;
    - l) Registrations Committee - Council appointment and VA/ category representation;
    - m) Research Committee – Council appointment;
    - n) Validations Committee – Council appointment;
    - o) RPL Committee - Council appointment and VA/ category representation;
    - p) VA Forum - Registrar led forum with VA mandated representatives.
  - 2) adhere to the Code of Conduct for Council and committee members,
  - 3) be paid an honorarium on submission of verifiable claims for attending Committee meetings, and

## Schedule “7”

### Confidentiality and Information Sharing

- 1) Parties expressly undertake to keep confidential and not to disclose to any person without the prior written consent of SACAP, the information on the database, or matters discussed in SACAP committee structures.
- 2) Parties may only disclose confidential information to those officers, directors, employees, consultants and professional advisors in its employ who:
  - i. have a need to know (and then only to the extent that each such person has a need to know);
  - ii. are aware that the confidential information should be kept confidential;
  - iii. are aware of the disclosing party’s undertaking in relation to such information in terms of this MOU; and
  - iv. members who are privy to confidential information shall be held personally liable in circumstances where such information is disclosed by themselves to third parties.
- 3) SACAP shall make certain registration information from its database available to VAs from time to time for the specific purpose of furthering any of the objectives of this MOU.
- 4) Such information will be provided on the basis that in each case the VA provides SACAP with a written request and undertaking of the specific use thereof.
- 5) Private information of registered persons will at all times be privileged.

## Schedule “8”

### TRANSFORMATION

- a) Clear identification what is meant by transformation in all its ramifications?
- b) Setting realistic targets and plans.
- c) Incentivising transformation.
- d) Identification of bottle necks.
- e) VAs and Schools programmes.
- f) Succession planning.
- g) Embracing the BBBEE codes of the Construction Charter.
- h) Alignment with national imperatives.

**Sandi Morton**

---

**From:** SAIAT President <president@saiat.org.za>  
**Sent:** 24 October 2014 09:59  
**To:** sandi@saiat.org.za  
**Subject:** [SPAM] FW: Architectural Practices  
**Attachments:** MOU SACAP-SAIAT.pdf

---

**From:** Geneviev Abdul-Rahim [mailto:Geneviev.Abdul-Rahim@sacapsa.com]  
**Sent:** 24 October 2014 09:42 AM  
**To:** president@saiat.org.za  
**Subject:** Architectural Practices

Dear Mr Frans Dekker

Please find attached herewith the Memorandum of Understanding ("MOU") between the South African Council for the Architectural Profession ("SACAP") and the South African Institutes for Architectural Technologist ("SAIAT").

Please cc any responses Mr. Pappie Maja [Pappie.Maja@sacapsa.com](mailto:Pappie.Maja@sacapsa.com) and Mr. Toto Fiduli [Toto.Fiduli@sacapsa.com](mailto:Toto.Fiduli@sacapsa.com)

Kind regards

*Geneviev Abdulrahim*

Secretariat/PA to **REGISTRAR/CEO**

**SA COUNCIL FOR THE ARCHITECTURAL PROFESSION (SACAP)**

1<sup>st</sup> Floor, Lakeside Place, Cnr Ernest Oppenheimer and Queen Street, Bruma

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SOUTH AFRICAN COUNCIL  
for the  
ARCHITECTURAL PROFESSION



architecture  
OTHERWHERE  
durban  
2014

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South African Institute for Architectural Technologist  
Suite 9A, Ground Storey  
Sovereign House  
Cnr. Sovereign- and Mullins Streets  
BEDFORDVIEW  
2008

23 October 2014

Dear Mr Frans Dekker

Per email: [president@saiat.org.za](mailto:president@saiat.org.za)

**RE: Architectural Practices**

We refer to the Memorandum of Understanding ("MOU") between the South African Council for the Architectural Profession ("SACAP") and the South African Institutes for Architectural Technologist ("SAIAT"). In terms of clause 3 of the MOU, the parties are enjoined to share information.

Consequently, we request SAIAT to provide us with a list of all architectural practices in its data base, including a list of all architectural professional who undertake or carry out professional work in the practice.

Kind regards

Marella O'Reilly  
Registrar/CEO



architecture  
OTHERWHERE  
durban  
2014











E2	Hospital / Medical Facility	E2.1	Private Doctors Consulting Rooms	B	PD	PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PSAT	PA				
		E2.2	Medical Consulting Rooms	M			PSAT	PA		PSAT	PA			PA							PSAT	PA			
		E2.3	Medical Centre	H				PA			PA			PA										PA	
		E2.4	Satellite Clinic	M			PSAT	PA		PSAT	PA			PA										PA	
		E2.5	Community Health Centre	H				PA			PA			PA										PA	
		E2.6	Frail Care / Hospice	H				PA			PA			PA										PA	
		E2.7	Hospital / Trauma Unit	H				PA			PA			PA										PA	
			Nursing Homes																				PA		
			Teaching Hospitals																				PA		
E3	Residential Institution	E3.1	Home for the Elderly / Children	M			PSAT	PA		PSAT	PA		PA										PA		
		E3.2	School Hostel max 3 Storeys	M			PSAT	PA		PSAT	PA		PA										PSAT	PA	
		E3.3	School Hostel over 3 Storeys	H				PA			PA			PA									PSAT	PA	
		E3.4	Student & Youth Hostel max 3 Storeys	M			PSAT	PA		PSAT	PA		PA										PSAT	PA	
		E3.5	Student & Youth Hostel over 3 Storeys	H				PA			PA			PA									PSAT	PA	
		E3.6	Workers Hostel max 3 Storeys	M			PSAT	PA		PSAT	PA		PA									PAT	PSAT	PA	
		E3.7	Workers Hostel over 3 Storeys	H				PA			PA			PA								PAT	PSAT	PA	
		E3.8	Community Care Centre	M			PSAT	PA		PSAT	PA		PA											PA	
		E3.9	Sanatorium / Health Spa	H				PA			PA			PA										PA	
E4	Research Facility	E4.1	School Laboratory	M			PSAT	PA		PSAT	PA		PA										PA		
		E4.2	Privately Owned / Corporate Laboratory	H				PA			PA			PA									PA		
		E4.3	Regional / National / University Research Institute	H				PA			PA			PA									PA		
EXEMPTIONS																									
	Scientific		Observatories																				PA		
			Meteorological Station																				PA		
			Geophysical Station																				PA		
			Seismographic Station																				PA		
<b>F</b>	<b>SHOPPING CENTRES</b>																								
F1	Large Shop	F1.1	Shop Interior	L	PD	PAT	PSAT	PA	PAT	PSAT	PA		PA										PAT	PSAT	PA
		F1.2	Department Store max 2 Storeys	M			PSAT	PA		PSAT	PA		PA										PSAT	PA	
		F1.3	Department Store > 2 Storeys	H				PA			PA			PA									PSAT	PA	
		F1.4	Local Convenience / Neighbourhood Retail Centre max 1 000 sq m	M			PSAT	PA		PSAT	PA		PA											PA	
		F1.5	Suburban Shopping Centre	H				PA			PA			PA										PA	
		F1.6	Regional Shopping Centre	H				PA			PA			PA										PA	
F2	Small Shop	F2.1	Corner Store / Home (Spaza) Shop max 500 sq m	B	PD	PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA									PAT	PSAT	PA	
F3	Wholesaler's Store	F3.1	Max 2 000 sq m / max 3 Storeys	M			PSAT	PA		PSAT	PA		PA									PAT	PSAT	PA	
		F3.2	Unlimited Size	H				PA			PA			PA								PAT	PSAT	PA	
<b>G</b>	<b>OFFICES</b>																								
G1	Offices	G1.1	Individual Studio / Offices max 500 sq m / max 1 Storey	B	PD	PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA										PSAT	PA	
		G1.2	Individual Studio / Offices max 500 sq m / max 2 Storey	L		PAT	PSAT	PA		PSAT	PA			PA									PSAT	PA	

		G1.3	Office Building / Park max 3 Storeys	M			PSAT	PA		PSAT	PA								PSAT	PA		
		G1.4	Multi-Storey Office Building / Office Park	H				PA			PA								PSAT	PA		
		G1.5	Office Building > 30 m, Service Towers & Skyscrapers	H				PA			PA								PSAT	PA		
<b>H</b>	<b>RESIDENTIAL</b>																					
H1	Hotel / Hospitality	H1.1	Guest House max 12 Bedrooms	L	PD	PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA						PSAT	PA		
		H1.2	Game Lodge	M			PSAT	PA		PSAT	PA		PA						PSAT	PA		
		H1.3	Holiday Apartments max 3 Storeys	M			PSAT	PA		PSAT	PA		PA							PA		
		H1.4	Motel / Hotel / max 30 Bed / max 3 Storeys	M			PSAT	PA		PSAT	PA		PA							PA		
		H1.5	Multi-Storey Hotel / Holiday Apartments	H				PA			PA		PA							PA		
H2	Multi-Unit Residential	H2.1	Multi-Storey Apartment Building	H				PA			PA		PA							PA		
		H2.2	Block of Apartments max 3 Storeys	M			PSAT	PA		PSAT	PA		PA							PA		
		H2.3	Block of Apartments max 2 Storeys max No Units 10	L		PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PA		
		H2.4	Townhouse Development max 2 Storeys max No Units 10	L		PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PA		
		H2.5	Townhouse Development max 3 Storeys max No Units 40	M			PSAT	PA		PSAT	PA		PA							PA		
		H2.6	Townhouse / Residential Village Development Unlimited Size	H				PA			PA		PA							PA		
		H2.7	Recreational Estate ( Marina Golf etc )	H				PA			PA		PA							PA		
			Barracks																PSAT	PA		
			Special Needs Housing																	PA		
			Housing for Frail & Elderly																	PA		
H3	Dwelling House	H3.1	Single / Double Dwelling 2 Storeys / max 500 sq m	B	PD	PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA						PAT	PSAT	PA	
		H3.2	Single / Double Dwelling max 2 Storeys / max 750 sq m	L		PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PSAT	PA	
		H3.3	Single / Double Dwelling Unlimited Size	M			PSAT	PA		PSAT	PA		PA							PSAT	PA	
			Single Dwelling Unit 1 storey																PD	PAT	PSAT	PA
			State-Aided Housing																		PA	
<b>EXEMPTIONS</b>																						
			Swimming Pools																	PAT	PSAT	PA
<b>J</b>	<b>STORAGE</b>																					
J1	High Risk Storage	J1.1	Petrochemical / Toxic Waste / Flammables etc.	H				PA			PA		PA								PA	
J2	Moderate Risk Storage	J2.1	Max 500 sq m / max 2 Storey	L		PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PSAT	PA	
		J2.2	Max 1 000 sq m / max 3 Storeys	M			PSAT	PA		PSAT	PA		PA							PSAT	PA	
		J2.3	Unlimited Size	H				PA			PA		PA							PSAT	PA	
J3	Low Risk Storage	J3.1	Max 1 000 sq m / max 2 Storey	L		PAT	PSAT	PA	PAT	PSAT	PA	PSAT	PA							PSAT	PA	



