

Our Reference: **APPBCA-2024-20**

Audit and Inspection Group

2 December 2024

See **Distribution List**

Dear Sir/Madam

REMINDER 2024 - REQUIRED SITE CONDITIONS AND COMPLETION OF CONQUAS AND QUALITY MARK ASSESSMENTS BEFORE TOP/CSC INSPECTION

Objective

1. This circular is to remind the industry on the required site conditions and requirements for TOP/CSC inspection.

Background

2. BCA had issued circulars previously (reference APPBCA-2023-03, issued on 17 February 2023) to remind the industry on the required site conditions for TOP/CSC inspections. Despite the reminders, we are still seeing Developers and Qualified Persons (“QPs”) calling for TOP/CSC inspections prematurely. We have also been seeing more residential sites with liveability issues although they are supposed to be ready for occupation. These sites eventually required re-inspections, creating abortive work for project teams and government agencies and depriving other sites of an earlier inspection.

3. As a recap, examples of unacceptable site conditions include:

- (a) No safe and proper access to or within the project site;
- (b) Incomplete building works relating to safety that will be subject to TOP/CSC inspection such as safety barriers, treads and risers, headroom, ventilation, etc.;
- (c) Non-compliance with accessibility requirements due to incomplete works in areas such as doors, accessible washrooms, ramps, floor surfaces and signages, etc.;
- (d) Liveability issues in building works that would be detrimental to the well-being of occupants such as water seepage, incomplete unit works and functional defects.

Please refer to Annex A for examples of unacceptable site conditions.

Completion of CONQUAS and QUALITY MARK Assessments before TOP/CSC Inspections

4. Under the Terms and Conditions for Construction Quality Assessment System (CONQUAS) and Quality Mark for Good Workmanship Certification Scheme (QUALITY MARK), project parties who have subscribed to CONQUAS/Quality Mark are required to **complete all relevant assessments** before applying for TOP/CSC inspections. This is to ensure that BCA assessors have access to the project site and residential units for purposes of carrying out CONQUAS/QUALITY MARK assessments.

5. While BCA has been exercising discretion to proceed with the inspection for sites where project parties had not completed their relevant assessments, we have observed many instances when such incomplete assessment led to issues, e.g. delaying downstream TOP/CSC approvals.

6. To allow time for industry to adjust to this requirement, **with effect from 1st June 2025**, BCA would not proceed with TOP/CSC inspections for projects that have not completed their assessments for CONQUAS/QUALITY MARK, where applicable¹. Please schedule and request for CONQUAS/QUALITY MARK assessments accordingly. Appeals to waive this requirement will only be considered for exceptional cases.

Reminder On Required Site Conditions and Requirements before calling for TOP/CSC Inspections

7. We would like to remind the industry, in particular the Developers and supervising Qualified Persons (QPs) to ensure the following requirements are met before applying for TOP/CSC inspections:

- (a) ensure all building works at site are completed and in a liveable state (i.e. will not be in a state that is detrimental to occupants' well-being), and
- (b) ensure all CONQUAS/QUALITY MARK assessments (if applicable) are completed.

Actions by CBC for Unacceptable Site Conditions at TOP/CSC Inspection

8. We wish to reiterate that the declarations of completion of building works and compliance with the regulatory requirements, submitted to the Commissioner of Building Control ("CBC") in respect of a TOP/CSC application, when the works on site are incomplete may amount to **an offence of false declaration under Section 43A of the Building Control ("BC") Act**.

9. In addition, under Section 9(4) of the BC Act, supervising QPs, must take all reasonable steps and exercise due diligence in supervising and inspecting the building works to ensure that the works are carried out in accordance with the BC Act, Regulations, and the approved plans. Thus, we would like to remind the QPs to **declare completion of works only when this is factually true and correct**.

¹ For project parties that wish to proceed with TOP/CSC inspections when the projects CONQUAS/QUALITY MARK assessments are not completed, the CONQUAS/QUALITY MARK assessments for the project will be terminated immediately.

10. Additionally, CBC will also take actions against the project team (i.e. Developer, QP and Builder) if sites are found to be in unacceptable conditions including:

- (a) immediate termination of the TOP/CSC inspection and requiring a re-inspection;
- (b) restricting express TOP/CSC inspections and express TOP/CSC applications for current and future projects;
- (c) requiring the submission of 360 Capture² of the project (site conditions and completed works) prior to the re-inspection of current project and before the inspection of future projects.

For Clarification

11. We would appreciate if you could convey the contents of this circular to members of your organisation. For clarifications, please contact us through BCA's Online Feedback Form at <https://www.bca.gov.sg/feedbackform/>.

Yours sincerely,

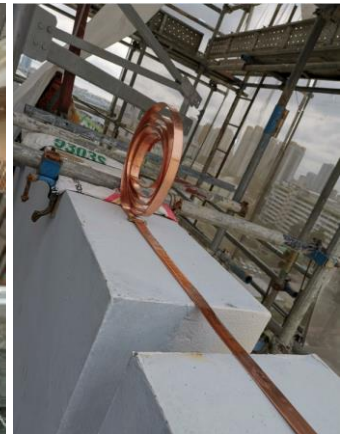
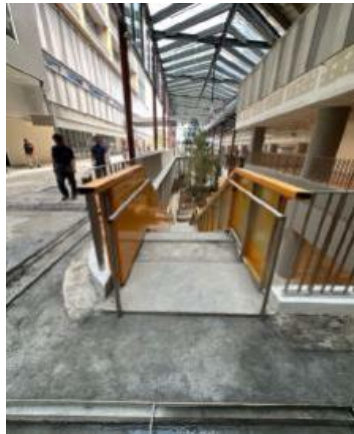
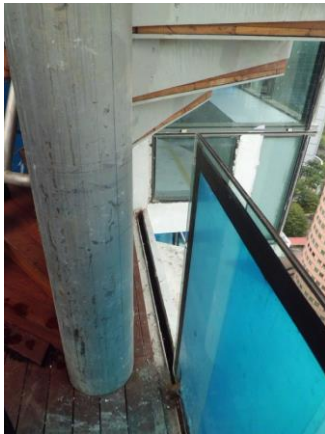
JUSTIN TAI
DIRECTOR
AUDIT & INSPECTION GROUP
BUILDING AND CONSTRUCTION AUTHORITY
FOR AND ON BEHALF OF THE COMMISSIONER OF BUILDING CONTROL

² 360 capture is the use of 360 camera to record 360 photo/video of the project site such that the site could be viewed from every direction. More details of 360 capture can be found in <https://www.bcaa.edu.sg/industry-implementation-of-smart-inspection-technologies>

Annex A:

Building works at TOP Inspection	Unacceptable Site Conditions
1. Safety and Approved Document Provision	
a. No safe and proper access to or within the development	• Presence of construction equipment (i.e., gondola, crane, truck) • Presence of construction material/debris (i.e., cement debris on the floor/ track) • No proper access to building (i.e., pavement finishes, driveway, BFA route) • Incomplete façade (i.e., window/curtain wall/screen wall/plaster/paint)
b. Incomplete building works related to safety and affecting TOP/CSC inspection	• Incomplete structural works (i.e., safety barrier & stairs flight) • Incomplete finishing works which affects the measurements of width of corridors and staircases, safety barriers, ceiling height, headroom among others
2. Accessibility Provision	
a. Incomplete accessibility requirements	• Incomplete communal facilities (i.e., e-deck: swimming pool/playground/BBQ pit/gym) • Incomplete fitting-out works within unit (i.e., sanitary fitting in retrofit toilet, carpentry & joinery near entrance, wall finishes) • Incomplete doors, accessible washrooms, ramps and floor surfaces, handrails and signages among others
3. Liveability Issues	
a. Issues that create inconvenience and disruption to occupants such as water damage, incomplete unit works and functional defects	• Water damage (i.e., units, common areas) • Incomplete works (i.e., flooring, windows, ceiling, wall) and functional issues (i.e., blocked drainage, cracked glass panels, damaged window frames, loose/incomplete electrical fittings)

Examples of Incomplete Building Works (Affecting Safety and Accessibility)



Examples of Liveability Issues

Water damage in units and common areas.



Why is it important?

- Water seepages in residential units can cause damage and loss of use to property.
- Typically, extensive investigations are required to identify the source of the water ingress (especially if it is embedded within walls and floors) and occupants will experience significant inconvenience and disruption upon occupancy of their units.

Incomplete works (i.e., floor, window, wall, mechanical/ electrical services) and functional Issues (i.e. cracked glass, damaged window frame, loose/ incomplete electrical fittings)



- Incomplete flooring, windows, ceiling or wall would result would affect the liveability of the unit.
- Damaged materials such as window frame and cracked glass panels, and loose/incomplete electrical fittings could cause inconvenience and pose danger to the occupants.
- Blocked pipe/drainage can cause water to build up and overflow/pond which may result in damage to property and inconvenience to occupants

DISTRIBUTION (via e-mail):

President
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79 Neil Road
Singapore 088904

President
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18 Sin Ming Lane
#06-01 Midview City
Singapore 573960

President
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Singapore 579700

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Singapore 329975

President
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110 Middle Road
#09-00, Chiat Hong Building
Singapore 188968

President
Association of Property & Facility Managers (APFM)
110 Middle Road
#09-00, Chiat Hong Building
Singapore 188968

President
International Facility Management Association, Singapore Chapter (IFMA)
Killiney Road Post Office
P.O. Box 2104
Singapore 912352

President
Society of Project Managers (SPM)
Macpherson Road P.O. Box 1083
Singapore 913412

Registrar
Board of Architects (BOA)
5 Maxwell Road 1st Storey
Tower Block, MND Complex
Singapore 069110

Registrar
Professional Engineers Board, Singapore (PEB)
52 Jurong Gateway Road #07-03
Singapore 608550

Director
Building and Infrastructure
Defence Science & Technology Agency (DSTA)
1 Depot Road
Defence Technology Tower A
Singapore 109679

Deputy Chief Executive Officer
Building
Housing & Development Board (HDB)
480 Lorong 6 Toa Payoh
HDB Hub
Singapore 310480

Deputy Chief Executive
Infrastructure & Development
Land Transport Authority (LTA)
1 Hampshire Road
Block 8 Level 1
Singapore 219428

Director
Land Planning Division
JTC Corporation (JTC)
8 Jurong Town Hall Road
The JTC Summit
Singapore 609434

Director of Infrastructure
School Campus Department
Ministry of Education (MOE)
1 North Buona Vista Drive
Office Tower Level 9
Singapore 138675

Chief
Healthcare Infrastructure Project
MOH Holdings Pte Ltd (MOHH)
1 Maritime Square
#11-25, Harbourfront Centre
Singapore 099253

Chief Engineer
Development Control Department
National Environment Agency (NEA)
40 Scotts Road
Environment Building
Singapore 228231

Group Director
Policy & Planning Division
National Parks Board (NPARKS)
Singapore Botanic Gardens
1 Cluny Road
Singapore 259569

Director (Building & Estates Management)
People's Association
(PA) 9 King George's
Avenue
Singapore 208581

Deputy Director
Centralised Service Department, Building Plan
Public Utilities Board (PUB)
40 Scotts Road
Environment Building
Singapore 228231

Senior Director
Fire Safety Department
Singapore Civil Defence Force (SCDF)
HQ Singapore Civil Defence Force
91 Ubi Avenue 4
Singapore 408827

Director
Volunteer & Community Partnership Department
Singapore Civil Defence Force (SCDF)
HQ Singapore Civil Defence Force
91 Ubi Avenue 4
Singapore 408827

Assistant Chief Executive
Sentosa Development Corporation (SDC)
33 Allanbrooke Road, Sentosa
Singapore 099981

Chief
Sport Infrastructure Group
Sport Singapore (SportSG)
3 Stadium Drive
Singapore 397630

Assistant Chief Executive
Policy & Planning Group
Singapore Tourism Board (STB)
1 Orchard Spring Lane
Tourism Court
Singapore 247729

Chief Executive Officer
Urban Redevelopment Authority (URA)
45 Maxwell Road
The URA Centre
Singapore 069118

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