



ENGINEERS
AUSTRALIA

Ms Chris Archer

Assistant Director – Regulation Policy, Planning and Local Government
Department of Treasury and Finance
1 Treasury Place
Melbourne VIC 3000

24 January 2018

Dear Ms Archer

RE: Engineers Registration Bill 2017

Engineers Australia would like to thank the Department for the opportunity to make comment on the proposed Bill.

Engineers Australia strongly supports the introduction of registration in Victoria.

Registration of engineers will provide surety for the public, the government and industry that engineers working in Victoria meet the standards and qualifications expected of the profession.

We look forward to working with the Department during the process in the lead up to the Bill being presented to the Parliament; specifically, we would like to continue our discussions on:

Protecting the term engineer.

Critical to the success of registration is ensuring that the use of the term engineer is protected.

Use of the title 'engineer' is largely unrestricted and has become a generic term. In the absence of regulation for engineering, anyone can claim to provide engineering services without the appropriate competencies, and with total disregard for standards.

In many countries, engineering is seen as a critical profession, whose practitioners are recognised and registered by government. Many of Australia's trading partners, such as Japan, Malaysia, Canada, European Union, much of the United States, China and Singapore, have statutory registration and place faith in a legislated and comprehensive registration system. Some countries protect the term engineer by statute. As well as protecting the integrity of the profession and properly attaching societal and economic import to the profession, it protects the community.

We look forward to the finalised legislation providing the necessary framework to protect the profession in Victoria.

Flexibility for new Areas of Practice.

Engineering Areas of Practice (AoPs) can expand and change over time for a variety of reasons.

Assessing entities need to have the flexibility to submit new AoPs as they arise so that the Act can accommodate these changes quickly and efficiently.

Ensuring appropriate qualifications or equivalent

The Washington Accord, to which Engineers Australia is a full signatory, is the peak international agreement between countries to ensure that engineering graduates are recognised throughout the world.

By being a part of this international group Australian universities and their engineering graduates are globally recognised for their deep knowledge and understanding of engineering, and provides the groundwork for international mobility of Australian engineers throughout the world.

Secondly, the Washington Accord provides security for the Australian market that engineers who have completed degrees approved by signatory organisations have achieved the requisite knowledge that underpins Australia's university engineering degrees.

Professional experience.

The greatest risk is from people attempting to undertake engineering work without adequate skills or competencies.

Risks include increased construction and rectification costs, litigation expenses, lost production and injury or death. Governments and companies cannot afford the associated loss of reputation.

Worryingly, deficiencies in work completed may not become apparent for many years after the work has been completed.

Providing clear definitions on relevant professional experience will provide that those engineers have the requisite knowledge that matches their service.

Disciplinary transparency

Both users of engineering services and those who provide those services need to have clear and defined complaint handling processes to follow.

Investigative timeframes should be clear and defined which gives confidence for the complainant and guidance for the registrant that any complaint will be handled expediently as well as with rigor.

Conclusion

Engineering services are vital to Victoria's economic prosperity and social well-being. The community and business expect high standards from engineering practitioners and poor engineering work can pose serious risks for public health, safety and property.

It is for these reasons that Engineers Australia continues to advocate for a strong and reliable registration system for engineers, including professional engineers, engineering technologists and engineering associates.

In our review of the Bill we have found areas that we would seek clarification on, as the process of drafting the regulations that will accompany this legislation progresses, and we look forward to working with the Department.

Should you have any questions on our submission or would like to discuss this submission in more detail please contact me on (03) 9321 1707 or by email hcarlos@engineersaustralia.org.au.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Herve Carlos', enclosed in a thin black rectangular border.

Herve Carlos
Victoria Division Manager
Engineers Australia