



July 2023

South Australian Registration of Engineers

**SUBMISSION TO CONSUMER AND BUSINESS
SERVICES SOUTH AUSTRALIA**

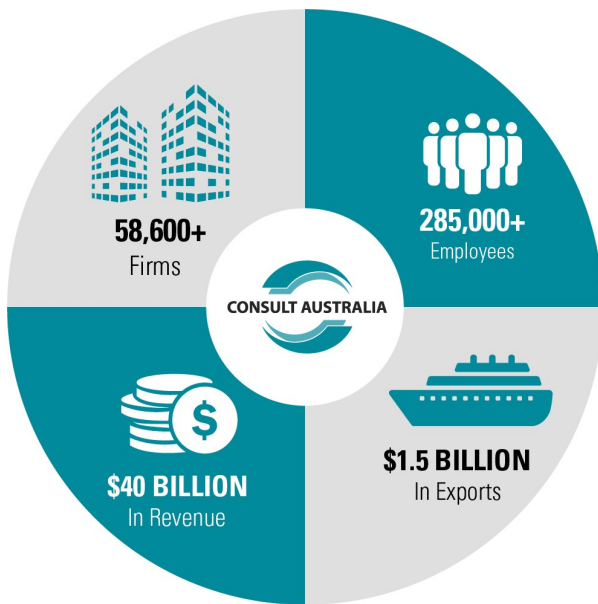
Consult Australia

Postal Address: GPO Box 56, Sydney NSW 2001
Email: info@consultaustalia.com.au

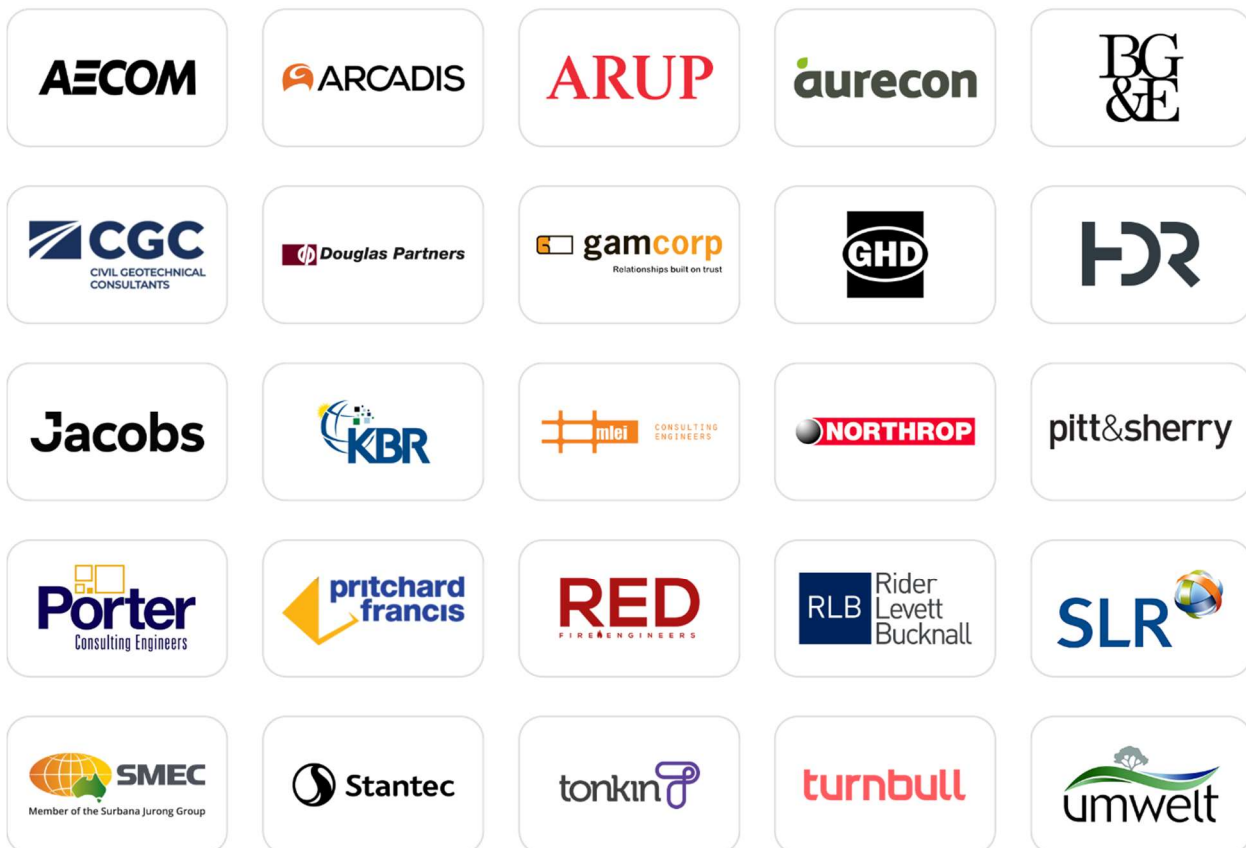
Tel: 02 8252 6700
Web: consultaustalia.com.au

ABOUT US

Consult Australia is the industry association representing consulting businesses in design, advisory and engineering, an industry comprised of over 58,600 businesses across Australia. This includes some of Australia's top 500 companies and many small businesses (97%). Our members provide solutions for individual consumers through to major companies in the private sector and across all tiers of government. Our industry directly employs over 285,000 people in architectural, engineering and technical services and many more in advisory and business support. It is also a job creator for the Australian economy, the services we provide unlock many more jobs across the construction industry and the broader community.



Our members include:



A full membership list is available at: <https://www.consultaustralia.com.au/home/about-us/members>

Executive summary

Consult Australia welcomes the opportunity to contribute to the South Australian Consumer and Business Services consultation on the proposed scheme for engineering registration in South Australia. Following our participation in the South Australian government's roundtable on 29 May 2023, this submission outlines our position on several matters raised in the government's Discussion Paper.

We have previously expressed concerns with the introduction of jurisdiction-by-jurisdiction government registration schemes across Australia in the absence of fully effective automatic mutual registration, because of the administrative and financial burdens on businesses whose engineering staff work on projects across state and territory borders. The first section of our submission addresses this aspect which we understand requires not only South Australia's buy-in but every state and territory as well as the Federal Government.

This rest of the submission outlines the aspects of the proposed South Australian framework we support and those where we see potential issues or opportunities for improvement. We have prepared this submission in consultation with our member businesses who operate locally, across Australia and the world, and who represent the full spectrum of business types from sole traders, up to large multinationals. The experience of members we can draw on is extensive and we trust this will assist the government in its implementation of the proposed registration scheme. We would be pleased to provide further insights as needed.

Our submission covers the following elements:

- engineering disciplines
- continuing professional development (CPD)
- fees
- date of implementation.

We look forward to working with the South Australian government as the registration scheme is developed.



Matthew Williams, State Manger, Consult Australia

National registration

Consult Australia has long advocated for national registration as a priority, with automatic mutual registration akin to a driver's licence model for engineering registration, with a 'one fee, one registration'. We understand that this is a topic outside of the consultation, however, it is an area we believe could gain greater traction with the support of the South Australian government. We include our comments here to put the proposed South Australian registration scheme in its broader context and highlight areas of business concern that could be alleviated with a collaborative whole of government approach.

Without truly harmonised arrangements, the administrative burden, and financial costs on businesses from professional engineers' registration around Australia are significant. The table below sets out the annual costs for one practitioner registered with government professional engineering registration schemes around Australia. Please note we have not included broader 'building practitioner' registrations (such as the Northern Territory's Register of Building Practitioners) but just the government schemes focussed on professional engineers.

COSTS	JURISDICTION					
	QLD	NSW	VIC	ACT	WA	SA
Initial	\$191.20	\$423.00 ¹	\$244.43 ²	Unknown	Unknown	Unknown
Renewal	\$247.00	\$317.00	\$265.36 ³	Unknown	Unknown	Unknown
Non-practising initial	\$190.40		\$57.43 ⁴	Unknown	Unknown	Unknown
Non-practising renewal	\$123.45		\$61.66 ⁵	Unknown	Unknown	Unknown

We are concerned by the level of duplication of effort in registration plus the cost of fees across Australia that could be prevented if fully effective automatic mutual registration was implemented.

The vast majority (if not all) businesses pay registration fees for their employees. Further, over 90% of Consult Australia members, including sole traders and small/medium enterprises work on projects in more than one jurisdiction. Significant occupational mobility is needed to enable businesses to deliver the vast range of projects in different parts of the country for different clients, whether it be Department of Defence, state/territory governments or local councils. Therefore, to maintain registration of their staff, ready for deployment on projects in various locations, the registration costs are significant for businesses.

If a business has a qualified engineer in Australia that works on projects across Qld, NSW and Vic they need to spend approximately \$858.63 in initial registration fees, and approximately \$829.36 in renewal costs. The new SA registration costs would be added to this if that practitioner also

¹ This excludes costs associated with registering as a design practitioner additional to professional engineers' registration under the NSW Design & Building Practitioners Act 2020 (NSW).

² The Victorian registration scheme applies a three-year fee of \$507.80 for initial registration. The initial endorsement cost is an additional fee of \$225.50. This figure is calculated by dividing \$733.30 (the total of the registration fee and endorsement cost) by three.

³ The Victorian registration scheme applies a three-year fee of \$570.60 for registration renewal. The endorsement renewal fee is also \$225.50. This figure is calculated by dividing \$796.10 (the total renewal fee and renewal endorsement cost) by three.

⁴ The Victorian registration scheme applies a three-year fee of \$172.30 for initial registration of a non-practising professional engineer, which has been divided by three to get this figure.

⁵ The Victorian registration scheme applies a three-year fee of \$185.00 for the registration of a non-practising professional engineer, which has been divided by three to get this figure.

worked on a SA project. Further, the administrative burden from this 'multiple fee, multiple registration' arrangement should not be ignored.

When recent amendments to the *Mutual Recognition Act 1992* (Cth) were proposed, Consult Australia was supportive of the mutual registration elements. Unfortunately, the implementation of the Act has not resulted in a fully effective mutual registration system because of the flaws in the definition of 'home state'. The definition focusses on the state in which a person has their principal place of residence or principal place of work. The drafting assumes that a person's initial registration will be in the state that is also their 'home state', which is not always the case.

For example, we will have many engineers living and working in South Australia who are already registered in Queensland – the jurisdiction which has had professional engineering registration for the longest time. It is also possible that engineers working on South Australia projects will be registered in Victoria and/or NSW as professional engineers given the recent introduction of government registration schemes there. Using the 'home state' definition these practitioners will not benefit from automatic mutual recognition because their 'home state' is South Australia. This is the case even if South Australia introduces a scheme that is identical to any of the other jurisdictions.

From Consult Australia's perspective, restrictions on the movement of skills across Australia through 'multiple fees, multiple registration' arrangements are a key market capacity constraint. Given the skills shortages across Australia and in engineering disciplines in particular, we recommend the government advocate with its Federal and state/territory counterparts for amendment to the 'home state' definition to recognise a practitioner's first registration if your principal place of residence or work did not have a scheme in place at the time of the first registration.

It is vital that any registration scheme takes into consideration the occupational behaviours of the Australian engineering industry and promotes flexibility, efficiency, and affordability wherever possible.

Comments on the South Australian scheme

Engineering disciplines

We understand the proposed categories of engineering registration are:

- civil engineering
- structural engineering
- hydraulic
- mechanical engineering
- geotechnical engineering
- fire safety.

We recommend that **electrical engineering** be added to the categories of engineering as it is an important area of engineering including safety implications.

We would also like to further unpack the reasoning behind the choice of 'hydraulic' as a category. Our members have provided feedback that this qualification is not available as a standalone. Generally, engineers working on hydraulics are those with a mechanical engineering qualification. Therefore, we recommend removal of hydraulic as a standalone discipline.

CPD

We understand that the proposed scheme will incorporate CPD requirements as determined by the Commissioner for the maintenance of registration. Employees of most of our member businesses

already undertake voluntary training and education to extend their knowledge and skills in the industry, often through on the job-learning and development activities. This education comes in various forms from attending external presentations, joining committees, preparing educational content such as videos or articles, attending structured learning activities in their own workplace and more. It is vital that a variety of education formats be accepted as part of the proposed CPD under the South Australian scheme to ensure that all tiers of business from small through to large can participate in accessible and affordable learning.

We have concerns that any apportionment model that does not consider the extensive range of skills and experiences directly developed through an engineer's day-to-day work will impose both financial and administrative burdens on engineering businesses, particularly small and medium businesses where resources are finite.

Fees

We understand that the scheme is proposed to be self-funding. We welcome any opportunity to comment on the proposed fee scheme prior to its implementation.

Date of implementation

It is not clear from the discussion paper when the proposed registration of engineer's scheme would take effect. We would appreciate the opportunity to be kept informed should this be updated.