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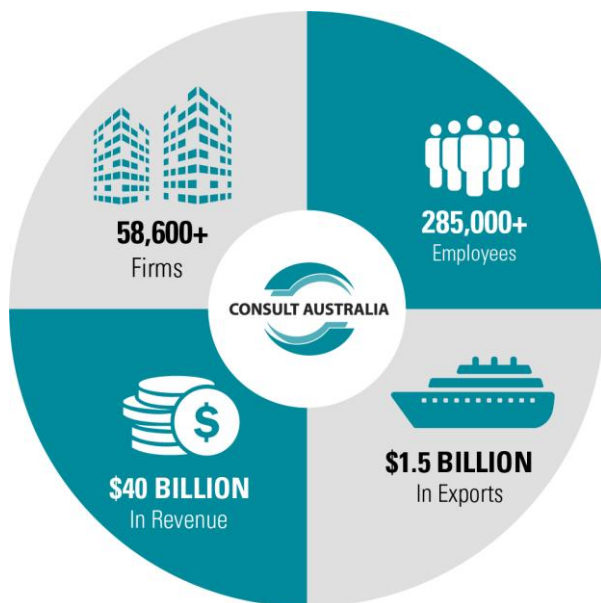
**Statutory Review of the  
*Professional Engineers  
Registration Act 2019 (Vic)***

DEPARTMENT OF GOVERNMENT SERVICES

Consult Australia

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### 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 on our [website](#).

## Executive summary

Consult Australia is pleased to submit to the Victorian government's review of the *Professional Engineers Registration Act 2019* (Vic). Our submission outlines the key challenges faced by member businesses and proposes practical reforms to reduce burdens on industry and, therefore, enhance productivity.

Victoria's scheme mandates registration for engineers working in or for Victoria, including those based interstate.

Consult Australia member businesses have noted that the current implementation of the Act imposes unnecessary administrative and financial burdens, particularly in comparison with other jurisdictions. We urge the Victorian government to streamline its registration process. We welcome the opportunity to collaborate with the government to ensure the scheme delivers the policy outcomes sought by the government without unreasonable burdens on businesses.

## Victoria's onerous requirements

Members that work across various jurisdictions have advised that Victoria's process is the most time-consuming and administratively burdensome. There are concerns about the way Consumer Affairs Victoria (CAV) administers the Act. Key concerns raised by members include:

- The significant cost burden of registration, in comparison with 2021.
- The lack of transparency on processing times for applications and renewals.
- CAV often fails to respond to applicant's questions or has extensive delays in responding to applicants.
- The inconsistency in the documentation that is accepted by CAV, from year to year.
- CAV has required professional engineers to provide more extensive identification documents than in the past, without clarifying the justification for this requirement. For example, multiple forms of ID and a criminal history check are now required. There are concerns about the security of data provided, given the increasing number of high-profile cyber-attacks accessing personal and identification data in Australia. It is also unclear why CAV needs this data and the benefit it provides against the burdens it imposes on professional engineers and their businesses.
- CAV requests ASIC extracts despite registration being for individual practitioners.

While out of scope of this statutory review, Consult Australia also notes that the absence of a unified national registration system forces businesses to navigate jurisdiction-specific hurdles, adding unnecessary complexity. It is recommended that the Victorian government work with other jurisdictions to implement a national scheme to realise productivity benefits for both government and industry.

To demonstrate some of the concerns with CAV implementation of the Act, we have gathered several case studies below.

### CASE STUDY 1 – Professional engineer based in another state

This professional engineer was initially registered in Victoria in 2021, noting that while based in another state, they were providing services in Victoria. In 2023, this registered professional engineer, underwent what they described as 'a relatively straightforward' registration renewal process. It took just 30 minutes and cost approximately \$190. However, the experience in 2024 was markedly different.

In 2024, the application process stretched over three hours, requiring extensive documentation including a copy of their passport, Medicare card, driver's license, and a National Criminal History Check—a new and unexpected requirement. Despite submitting all documents via the myCAV portal, the registration remained incomplete due to delays in the police check. With the registration set to expire in the coming months, the engineer has received no clear timeline from CAV on when the application will be finalised.

In addition, the registration fee has ballooned to \$800 for a three-year period, compared to the previous \$190 for one year. While this includes the cost of the police check, the annualised increase still represents a significant jump, raising concerns about transparency and consistency in fee structures.

In addition, CAV have rejected the engineer's confirmation of insurance coverage despite it being in the same format as accepted by CAV previously.

### CASE STUDY 2 – Small business with 5 professional engineers, based in Victoria

This small business notes that significant time is spent on registration of the professional engineers they employ. This business noted that for each registered professional engineer, there is a total of 7.5 hours spent on the administration across the four jurisdictions this business provides services to (Victoria, Qld, NT and Tas) – see the table below.

For completeness, the business also noted the time taken to complete the process with the professional body, Engineers Australia.

The Victorian process is the lengthiest at 5 hours per engineer, while the others take between 30 minutes to 1 hour per engineer. That is a significant burden on a business (of any size) and a significant productivity drain.

Jurisdiction/entity	Admin process involved	Time spent (hours)
NT	Completing documentation and payment of fee	1.0
QLD	Payment of fee	0.5
Tas	Payment of fee	0.5
Vic	Completing documentation and payment of fee	5.0
Engineers Australia	Payment of fee	0.5
TOTAL		7.5 hours

## Recommendations

Our recommendations go to the implementation of the Act, rather than the Act itself. While a cost/benefit analysis was likely done when the Act was proposed, no cost/benefit seems to have been conducted on how the Act is currently implemented. The concerns raised by Consult Australia members demonstrate the significant burden placed on businesses to ensure the professional engineers they employ are registered. However, it is unclear how these burdens are balanced with a counter balancing benefit for the community. It is recommended that the Victorian government ensure a cost/benefit analysis lens is applied when making requests of professionals it registers.

Having considered the burdens placed on industry in Victoria, Consult Australia further recommends that the Victorian government streamline the registration process. For example:

- CAV should reconsider the cost of registration to ensure it is necessary to administer the scheme.
- CAV should provide transparency on time frames of the application process and communicate delays effectively.
- CAV should provide timely responses to queries from applicants.

- CAV should develop consistent guidelines on acceptable documentation to provide consistent experience from year to year by applicants.
- CAV should reconsider the need for identity documentation. If identity documentation is needed CAV should be clear about the reasons for this. Further, CAV should use online identity verification, rather than obtain and retain identity documents.
- CAV should consider removing the requirement for a National Criminal History Check, but instead require applicants to disclose criminal history relevant to whether they are a 'fit and proper person' to be registered as a professional engineer.
- CAV should reconsider the need for ASIC extracts.

## Conclusion

By streamlining its own processes, the Victorian Government can reduce costs, improve compliance, and support the delivery of projects from critical infrastructure to residential. Consult Australia stands ready to collaborate with the government to ensure these reforms balance both industry needs while providing confidence to the broader community.

## Contact

We would welcome any opportunity to further discuss the issues raised in this submission.



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## Thanks to our Industry Champions

For their outstanding leadership and engagement on behalf of the industry.



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