

**Victorian Panel**

19<sup>th</sup> April 2021

Submitted online via <https://engage.vic.gov.au/engineers-registration>

To whom it may concern,

Further to previous correspondence with Department of Justice and Community Services (DJCS), we are writing to express our continued concerns about the Professional Engineers Registration Scheme. We intend to provide feedback on the proposed fee structure and Regulatory Impact Statement (RIS) in due course.

Throughout the consultation process, we have not formally opposed the registration scheme, but have advocated the importance of a system whereby engineers already deemed qualified, competent and experienced by a professional engineering organisation are considered to have met the requirements for registration on the state scheme.

The Institution of Mechanical Engineers (IMechE) holds a delegation from the UK's Engineering Council to assess engineers for Chartered Status. As a professional body with 120,000 members around the world, the IMechE only admits engineers as members via a robust process of qualification, skills and experience assessment. During the consultation process, we received firm indications from DJCS that members of the IMechE, or similar bodies, will be able to apply for registration in Victoria without further assessment. However, our last communication with DJCS appears to show a change of policy and occurred shortly before the registration process was handed over to Consumer Affairs Victoria (CAV) for final implementation, leaving this important query unresolved. In its most recent communication to us, DJCS said:

*"We did reconsider the drafting of the section [9.4 of the Regulations] and whether it should be extended to membership schemes operated by professional engineering associations that are not assessment entities under the Victorian Act. However, we decided against broadening the application of the section as we were concerned that, in practice, it would mean that assessment entities would be assessing and making decisions with respect to the membership schemes of other professional engineering associations."*

The explanation from DJCS is not entirely clear, but is at odds with advice we were previously given. It does not align with the intent of section 9.4 of the Regulations, and appears to contradict a recent bulletin by Engineers Australia to its members in which they stated *'no further assessment will be required for professional engineers...who hold a Chartered credential'*. On the day the registration scheme comes into effect, it appears that Engineers Australia will be the only Approved Assessment Entity in Victoria- or the only option available to many engineers seeking to gain registration in the state- which will create a monopoly and introduce a host of unfortunate repercussions for the industry.

We request further clarification on the above.

Yours faithfully

Nic Coulthard



IMechE, Victoria Panel