

Professional Engineers Registration (Fees) Regulations – Victoria

AusIMM Response to the Exposure Draft - May 3, 2021

The AusIMM is pleased to provide the following response and feedback to the proposed Professional Engineers Registration (Fees) Regulations, Victoria and the Regulatory Impact Statement.

Registration Fees for Professional Engineers

We note the following extract from the Regulatory Impact Statement regarding the purpose of the proposed Regulations:

The purpose of the proposed Professional Engineers Registration (Fees) Regulations 2021 (proposed Fees Regulations) is to set fees for registration and other services provided under the Professional Engineers Registration Act, refunds of fees and exemptions from fees in certain circumstances. These include fees for:

- ***a first registration which comprises an application and registration fee.***
- ***the renewal of a registration every three years which comprises an application and registration fee.***
- ***adding an area of engineering to a registration or endorsement***
- ***an initial endorsement***
- ***the renewal of an endorsement every three years***
- ***an annual endorsement statements.***
- ***a copy or an extract of the register of professional engineers***
- ***a certified copy or extract of the register.***

We consider the purpose and analysis of the Registration fees to be generally suitable, using the criteria under the Victorian Government's Cost Recovery Guidelines and the principles of Efficiency, Effectiveness and Equity.

However, we are concerned that the specific fees for each item may not match those currently used for the RPEQ scheme in Queensland. We believe it is essential that the fees for engineering registration across all jurisdictions should be the same, so that engineers do not seek to save costs by registering in different states.

The fees should also be the same in all jurisdictions in accordance with the principles of the federal legislation regarding Mutual Recognition.

Registration Fees for Assessment Entities

We note that the approval or variation of applications for an assessment scheme is to be accompanied by an application fee. We do not consider that fees for application for an assessment scheme as an assessment entity are appropriate, and indeed impose unnecessary costs on professional associations.

We remain concerned that professional associations will be charged a fee during the application for an Assessment Scheme, for considering applications for approval, renewal or varying an assessment scheme. This is not the case in Queensland, due to the significant effort in applying for an assessment scheme and establishing and managing assessment processes, not recovered by the professional associations.

The AusIMM considers the option of seeking a fee from Assessment Entities to be counter-productive and an unnecessary cost to the related professional associations.

We believe that any professional association that is capable of undertaking assessments of Registered Engineers, is doing so as part of a wider service to the engineering profession and is seeking cost recovery only from the registration process. Therefore, any additional fee on the professional association is not appropriate in our view.

We emphasise that professional associations will incur significant costs to prepare an application for an Assessment Scheme, so additional fees will effectively double the cost of the application process for professional associations. We would therefore request that these fees be withdrawn so as not to impose additional excessive costs on the professional associations.

While we accept that professional associations will charge a fee for assessment for engineering registration (in addition to the Victorian government fees), this fee will not be adequate to cover costs for assessment, annual audits, and renewal of registration.

In addition, we note that BPEQ reimburse professional associations when conducting audits of registered engineers, to allow professional associations to recover some costs during these individual audits. However, this reimbursement does not cover the full costs of the audits undertaken.

Therefore, we request that the fees for professional associations applying for an Assessment Scheme be withdrawn.