



Geelong Regional Engineers Group Inc

Submission from Geelong Regional Engineers Group –Statutory Review of the Professional Engineers Registration Act 2019

To:

Regulation Policy Consultation
Department of Government Services
Victoria, Australia
regulationpolicyconsultation@dgs.vic.gov.au

Date: 25 July 2025

Dear Regulation Policy Team,

On behalf of the Geelong Regional Engineers Group (GREG), we welcome the opportunity to contribute to the statutory review of the Professional Engineers Registration Act 2019 (PERA). Our group represents engineers across disciplines working in and for Victoria, and we commend the Department's commitment to stakeholder engagement through this review process.

1. General Observations

Since PERA came into effect on 1 July 2021, our members have experienced both benefits and challenges. While the Act's intent to uphold professional standards and protect consumers is widely supported, its implementation has raised concerns about duplication, clarity, and administrative burden.

2. Key Concerns from GREG Members

Feedback collected via email and internal discussions reveals several recurring themes:

- Duplication of Accreditation: Many engineers already hold national credentials such as CPEng, NER, RBP or RPEQ. PERA's additional registration layer is seen as redundant and confusing.
- Limited Practical Benefit: Members noted that registration did not lead to increased clientele, improved project outcomes, or enhanced professional standing. In some cases, it increased costs such as PI insurance without tangible benefits.
- Interstate Fragmentation: The lack of mutual recognition across states was a major concern. Engineers felt that each state having its own scheme undermines national consistency and mobility.

- **Impact on Practice Models:** Some members observed that the scheme may have inadvertently encouraged outsourcing of engineering services overseas, as local registration requirements added complexity and cost.
- **Exclusion of Certain Disciplines:** Engineers in niche or non-design fields felt excluded from the scheme, questioning its relevance to their practice.
- **Low Engagement:** Despite efforts to gather input at the earlier consultation phase, only a handful of members responded to calls for feedback, citing short notice and competing priorities such as EOFY deadlines.

3. Recommendations

- **Streamline Registration:** Align PERA with existing national frameworks to reduce duplication and simplify compliance.
- **Clarify Scope and Definitions:** Update and expand the guidelines to include emerging disciplines and clarify expectations for technologists and interdisciplinary roles.
- **Promote Mutual Recognition:** Establish mechanisms for interstate recognition to support national consistency.
- **Support Regional Engineers:** Provide targeted outreach and support for engineers in regional areas like Geelong to ensure equitable access and understanding of the scheme.
- **Encourage Broader Consultation:** Extend consultation timelines and diversify engagement methods to ensure more inclusive participation.

4. Engagement with the Review

5. Survey Insights from GREG Members

GREG conducted a member survey and invited direct feedback via email. While participation was modest, the responses reflect a broad spectrum of views and valuable insights into the lived experience of engineers under the current scheme. 7 members responded to the survey conducted by GREG regarding the Engineers Registration Act in Victoria.

- All respondents were aware of the Act.
- 1 reported that it had a significant impact.
- 4 noted only a minor impact on the industry and the work they do.
- 2 stated it had no impact on their work.

Key Themes from Survey Responses

Advantages:

While some respondents saw minimal or no advantages, other views included:

- **Enhanced Professional Oversight:** The Act has led to greater accountability and oversight by registered engineers, helping ensure that engineering work is reviewed and signed off by qualified professionals.
- **Improved Mentorship and Learning Culture:** The registration framework has encouraged mentorship, particularly for graduate engineers, fostering a culture of learning and professional development.
- **Clearer Professional Boundaries and Responsibilities:** Members noted improved clarity around who is responsible for technical decisions, which contributes to better risk management and project governance.
- **Elevated Professional Standing:** The Act has the potential to raise the public and industry perception of the engineering profession, reinforcing the importance of qualified practitioners.
- **Contribution to Public Safety:** By formalising responsibility and oversight, the Act may help reduce risks of engineering failures—such as those seen in high-profile incidents like the Grenfell Fire.

Disadvantages:

- **Increased Cost and Administrative Burden:** The registration process imposes both financial and time costs, especially for small firms. Preparing applications and maintaining CPD logs adds non-productive overhead without clear professional or commercial benefit.
- **Limited Market Impact and Recognition:** Members reported no tangible improvement in professional standing or access to work. The scheme is perceived as duplicative of existing credentials (e.g., NPER, CPEng) and lacks visibility in procurement processes, including state government contracts.
- **Reduced Competitiveness and Local Engagement:** The added regulatory layer has discouraged private sector engineering work in Victoria and contributed to outsourcing of engineering services overseas, undermining local expertise and industrial capacity.
- **Barriers for Early-Career Engineers:** Graduate engineers face limited autonomy and progression due to sign-off requirements and supervision constraints, which can delay projects and reduce hiring incentives.
- **Fragmented National Framework:** Inconsistencies across states—such as lack of recognition in Queensland—create confusion and limit mobility for engineers working across jurisdictions.
- **Perceived Lack of Value:** Some respondents felt the Act offers little practical benefit, describing it as “paying for a sticker” that doesn’t differentiate or elevate professional capability.

Recommendations:

- **Streamline or Reconsider the Regulatory Layer:** Several members suggested removing or significantly restructuring the current registration scheme, citing its negative impact on productivity and duplication of existing national systems.
- **Empower Employers and Market Accountability:** Rather than relying solely on government regulation, some respondents advocated for placing responsibility on employers to engage qualified engineers, allowing market forces to drive quality and accountability.
- **Improve Cost Efficiency and Accessibility:** Recommendations included reducing registration costs, limiting mandatory registration to overseas-based engineers, and offering subsidies or support for CPD and registration fees—especially for early-career professionals.
- **Enhance Public and Industry Awareness:** Members called for greater visibility and recognition of the RPEV designation, particularly in government procurement and public communications, to ensure its value is understood and respected.
- **Support Graduate Engineers:** Suggestions included introducing structured development pathways and transitional provisions to help graduates gain experience and progress toward registration.
- **Ensure Competent Oversight:** It was recommended that disciplinary panels or commissions include experienced engineers from relevant disciplines, supported by legal professionals with commercial expertise.
- **Promote National Consistency:** Respondents urged alignment with systems like RPEQ and the development of a nationally recognised framework to reduce fragmentation and improve mobility across states.

We trust that our submission will contribute meaningfully to the review and help shape a more effective and inclusive regulatory framework for engineers in Victoria.

Kind regards,
 Barry Chisholm
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