

7 October 2020

Page 1 of 2

Professional Engineers Registration Scheme
Department of Justice and Community Safety
121 Exhibition Street
Melbourne VIC 3000
By email only: engineers@justice.vic.gov.au

Dear Sir/Madam

Professional Engineers Registration Scheme

Thank you for the opportunity to comment on this proposal.

In general, we support the proposal to register professional engineers as the work they do needs to be of a high and consistent standard.

As the peak body representing local government in Victoria, we have been approached by a number of councils with concerns about the implications of professional registration on the ability to deliver works and improvements on behalf of their local community.

In particular, the supervision provisions as drafted in the legislation and accompanying draft "Guidelines on direct supervision", will have significant implications for smaller councils where there may only be one registered engineer on staff.

In the case of civil works requiring direct supervision this would imply that works would be unable to proceed in the absence of a professional registered engineer, such as during periods of annual leave or other absences.

It is also possible that works may be unable to proceed at multiple sites with the presence of only one engineer.

In practise, civil works are typically completed now under the supervision of an experienced construction supervisor who may not have a professional qualification or be eligible for a professional engineers registration.

There may be an opportunity to slightly temper the "direct supervision" element, particularly where there is an experienced non-registered supervisor on site. It is agreed that is important that the engineer maintains responsibility for the works delivered. However, it may be appropriate to allow the engineer uses their judgement to facilitate another appropriately experienced person they know and trust to deliver the works on their behalf.

We would welcome the opportunity to be part of your assessment of consultation feedback particularly as it relates to local government to find an appropriate way forward to support the intent of this legislative change whilst minimising any unintended consequences.



Should you wish to discuss this matter further or if you have any questions, please contact Mr Troy Edwards, Director Policy and Advocacy at tedwards@mav.asn.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Thompson', with a stylized flourish at the end.

KERRY THOMPSON
Chief Executive Officer