# Engineers registration reform - submission template

This submission template is designed to be read in conjunction with the consultation regulatory impact statement *Reforms to the approval process for commercial buildings in Western Australia*.

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **COVER SHEET FOR SUBMISSIONS**  **Please complete and submit your submission by  5pm WST on Thursday 3 December 2020** | | | | | | | | | | | | |
| Email submissions to: [engineers@dmirs.wa.gov.au](mailto:engineers@dmirs.wa.gov.au) | | | | | | | | | | | | |
|  | | | | | | | | | | | | |
| Contact name: |  | | | | | | | | | | | |
| Organisation: |  | | | | | | | | | | | |
| Position: |  | | | | | | | | | | | |
| Email: |  | | | | | | | | | | | |
| Phone: |  | | | | | Mobile: | |  | | | | |
| Postal address: |  | | | | | | | | | | | |
| Length of submission (number of pages, including this cover sheet): | | | | | | | | | | | | |
| Are you making this submission as: (please select one of the following categories) | | | | | | | | | | | | |
| Industry participant | | | Business | | | | | | | Permit Authority | | |
| Community organisation | | | Industry organisation | | | | | | | Individual | | |
| Other (please specify): | | | | | | | | | | | | |
| Which of the following industry sectors is relevant to you: (pick one or more) | | | | | | | | | | | | |
| Building design  Building certification  Building construction | | | | Building owner  Permit authority  Other (please specify): | | | | | | | | | |
| What specifically do you or your business do? | | | | | | | | | | | | |
| Approximately how many people work for the business or organisation in WA? | | | | | | | | | | | | |
| Fewer than five employees | | Five to 20 employees | | | 21 to 100 employees | | 100+ employees | | | | | n.a. |
| Do you operate across two or more states or territories? | | | | | | | | | Yes | |  | | |
| Approximately how many people work for the business or organisation interstate? | | | | | | | | | | | | |
| Fewer than five employees | | Five to 20 employees | | | 21 to 100 employees | | 100+ employees | | | | | n.a. |
| Are you making this submission as an individual?  What personal experience do you have in, or with, the building industry? | | | | | | | | | | | | |

Please note:

* When reading and commenting on the CRIS, please feel free to focus only on the areas that are relevant to you. A number of questions are included throughout the CRIS. These questions aim to make it easier for stakeholders to make comments. It is not expected that all respondents will respond to all questions and proposals.
* Submissions can be emailed to engineers@dmirs.wa.gov.au or posted in hard copy to the following address:

Engineers Registration Reform

Policy and Legislation Branch

Building and Energy

Department of Mines, Industry Regulation and Safety

Locked Bag 100

EAST PERTH WA 6892

* All submissions will be placed on the Department of Mines, Industry Regulation and Safety website and may be quoted in future publications, unless clearly marked as CONFIDENTIAL.
* As submissions will be subject to freedom of information rules, please do not include any personal or confidential information that you do not wish to become available to the public.
* Neither the State of Western Australia nor the Department of Mines, Industry Regulation and Safety takes responsibility or shall be liable for any breach of copyright or libellous or defamatory comments in submissions published by the Department of Mines, Industry Regulation and Safety.

## Proposal 1 – Register structural and fire safety engineers

**Proposal 1: Amend the Building Services (Registration) Regulations 2012 to register engineers in accordance with the Building Confidence Report.**

1. Do you support registration of the proposed categories of building-related engineers? Why, or why not?
2. Do you think people doing civil engineering work for buildings should be required to be registered? Why, or why not?
3. Are there any other categories of building engineering work that you think should be added, or deleted? If so, please specify.
4. Do you support the proposed definition of ‘building engineering work’ for the purposes of registration?
5. Do you support the definitions for the engineering categories proposed in Appendix C? Please specify.
6. Do you support the pathways proposed in Table 3 to register building engineers?
7. Do you support using industry accreditation schemes – e.g. professional NER, CPEng, RPEng and CEng – to assess qualifications and experience, and manage CPD requirements of registered engineers?
8. Are there any other industry accreditations that you think should be considered as appropriate pathways to register as an engineer in WA?
9. Do you support the proposed minimum financial requirements for engineering contractors? Why, or why not?
10. Do you think there should be mandatory minimum professional indemnity insurance requirements for engineering contractors? Why, or why not? And, if so, what do you think the minimum insured amount should be?
11. Do you support the proposed minimum CPD requirements for registered engineering practitioners? Why, or why not?
12. Do you support Proposal 1, to register building engineers, in whole or in part? Please specify.
13. Proposal 1 hinges on three main elements, being the:
14. definition of ‘building engineering work’ that only registered engineers may undertake;
15. categories of engineer required to be registered; and
16. registration pathways that set out the qualifications and experience required to be registered.

Do you think these three elements, as proposed, are likely to adequately regulate all engineers working in the building and construction industry in WA? Is there anything that you would amend or add? Please specify.

1. Do you think Proposal 1 will facilitate mutual recognition of registered engineers in other States and Territories? Please specify.
2. Do you foresee any other costs or benefits to implementing this proposal?

## Proposal 2 – Code of Conduct for registered engineers

**Proposal 2: Introduce a Code of Conduct for registered engineers, based on the code of conduct in place in Queensland.**

1. Do you support the adoption of a code of conduct for registered engineers? Why, or why not?
2. Do you agree with the code of conduct proposed in Appendix A? What would you add or delete?
3. Do you foresee any other costs or benefits to implementing this proposal?

## Proposal 3 – Registered persons to work within their area of competence

**Proposal 3: Amend the BSR Act to require that ALL registered building service providers must work within their area of competence.**

1. Do you support Proposal 3? Why, or why not?
2. Do you foresee any other costs or benefits to implementing this proposal?

**Implementation and review options**

1. Do you think an estimated average annual cost of $388 per engineer is a reasonable administrative cost for registered engineers? Why, or why not?
2. Do you think 24 months’ transition period is sufficient to allow industry participants to meet the proposed registration requirements?
3. Do you think online surveys are an appropriate way to obtain industry feedback on the operation of these reforms? If not, how do you think the reforms’ effectiveness should be evaluated?