Friday, September 8, 2023

Regulatory Services – Reform
Consumer and Business Services

AIRAH is grateful for the opportunity to provide feedback on the discussion paper about registration of engineers.

As Australia's peak membership body for mechanical engineers working in HVAC&R (heating, ventilation, air conditioning and refrigeration) and building services, AIRAH strongly supports professional registration of engineers in line with the recommendations of the Shergold-Weir *Building Confidence* report.

Our members are engineering professionals and senior trade leaders who research, design, construct, analyse, manufacture and maintain devices, machines and mechanical systems. These may include air conditioning plants, ventilation systems, chillers, cooling towers, refrigeration systems, fire and smoke systems, fans, pumps and control systems. Across Australia, we have more than 4,000 members, with active division committees in every state and territory, including South Australia.

As part of our commitment to the HVAC&R industry and the engineering profession, AIRAH has launched a professional accreditation scheme specifically designed for engineers operating in the HVAC&R building services industry. The AIRAH Professional Engineer Register (APER) accredits mechanical engineers in the HVAC&R building services discipline.

The APER accreditation has been approved in Queensland and Victoria, and is currently being assessed in New South Wales. When applications open in South Australia, we intend to apply to become an assessment entity through the APER program.

Based on our experiences in other jurisdictions, and after reading through the discussion paper, we offer the following feedback.

Defining professional engineering services

We note that the definition of "professional engineering services" is consistent with that used in other jurisdictions. There are, however, important areas where the definition would benefit from clarification. One such area is refrigeration.

Refrigeration systems include supermarkets, cold rooms, refrigerated warehouses and other plant that could fall under the definition of "building work" in the discussion paper.

The design of certain safety critical elements of these systems (refrigeration piping, rack design, switchboard design and possibly equipment selection) does need to be done by a suitably qualified and experienced engineer under current regulations and Australian Standards.

Other tasks – for example, smaller commercial coolroom design and installation – could be considered to fall outside the definition of "professional engineering services". However, since it is open to interpretation, and because clients and insurers will generally go with the interpretation that presents the least risk, they may request a registered engineer anyway. The people who do this work have trade qualifications rather than university degrees and would not be able to become registered under the proposed eligibility criteria. This would in turn lead to a shortage of workers, impacting critical systems, including supermarket cold food chains and healthcare facilities.

AIRAH recommends that the government provide clarity around which refrigeration work falls into the category of "professional engineering services". We would be happy to help develop this definition, and this would be consistent with the approach accepted in other jurisdictions, such as Queensland and Victoria.

Eligibility criteria

Due to a lack of tertiary qualifications that deal specifically with the HVAC&R services industry, many professionals working in this sector – including some who sit on committees developing Australian Standards and the National Construction Code – do not have a Washington Accord accredited degree in mechanical engineering. Far from strengthening the industry, the current system operating in some jurisdictions is locking expert practitioners out.

For these professionals and for the continued provision of supply, an alternative transitional pathway to professional registration is vital. The discussion paper notes that one option is for a professional to have an Australian or overseas non-Washington Accord academic qualification in a relevant area or areas of engineering that has been assessed as substantially equivalent to an accredited Washington Accord degree. For this alternative pathway to be effective, it must be possible for accredited engineering bodies to conduct this assessment – not exclusively a body that is a signatory to the Washington Accord.

For engineers working in HVAC&R industry sectors, this could take the form of an assessment process conducted by registered engineers in the same area of expertise, which AIRAH could offer.

PDI Act Interaction

We would simply note here that the issue around alternative pathways also applies. If “independent professional experts” are required to be professionally registered, it is vital that leading practitioners are not excluded from doing this work because of the lack of a genuine alternative pathway.

Once again, AIRAH appreciates the opportunity to participate in this consultation. If you have questions about any of the above points, we would welcome a meeting to discuss in more detail.

We look forward to being involved in the next steps of South Australia’s scheme for professional registration of engineers.

Best regards,

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