

Emailed to: CBSReforms@sa.gov.au

7 September 2023

Dear Consumer and Business Services – Regulatory Services – Reform Team,

AAAA Response to the Professional Engineers Registration Scheme Discussion Paper

On behalf of our South Australian members, the Australian Automotive Aftermarket Association (AAAA) welcomes the opportunity to respond to the discussion paper on the Registration of Engineers released by the South Australian Department of Consumer and Business Services.

After a careful review, consideration, and consultation, AAAA has several concerns regarding the potential implementation of this proposal. While not directly involved in the construction industry, we acknowledge that past incidents have necessitated legislative change in that sector, including the registration of engineers.

However, while supportive of industry-specific registration for construction, AAAA has several issues with the proposed expansion of this registration. These include its significant implications for South Australian businesses, its impact on consumers, and the lack of detail presented in the discussion paper about 'likely changes.' As such, AAAA welcomes future consultation but cannot support the paper's proposal in its current format.

Detail for the Implementation

We are pleased that the department is consulting with the broader industry prior to any implementation. However, we believe that a more detailed document outlining the need for these changes, as well as inviting industry input on potential impacts, would be more appropriate.

The changes proposed in this discussion paper are significant for engineers across all sectors. AAAA believes that disproportionate consideration was given to the construction industry's impacts and rationale without adequately weighing the consequences for engineers in other sectors.

Expansion to Sectors other than construction.

The discussion paper references a potential and likely expansion to cover all professional engineering disciplines but provides no further details about the needs and impacts of this expansion. Likewise, it lacks a proposed timeline for these significant changes. While the paper acknowledges the recent changes to the Victorian system however it fails to mention that these changes are not currently in force for non-construction sectors and Victorian Engineers in other fields have until the end of 2023. AAAA would therefore seek an immediate halt to any planned changes to the registration of professional engineers not in the construction sector until.

1. A full analysis can be done on the Victorian changes.
2. A complete risk assessment can be presented regarding the impact on South Australian businesses.
3. A transparent cost-benefit analysis can be provided, including a detailed explanation of why these changes are needed for the wider professional engineering industry.

Engineers employed by local manufacturers.

AAAA is concerned that the discussion paper provides no substantial evidence that engineers employed by South Australian businesses outside the construction industry pose a risk to consumers or the broader community. Our consultation with South Australian members reveals that existing laws and regulations ensure high-quality engineering services. This is evidenced by the absence of market failures in the South Australian automotive industry, in stark contrast to the construction sector. Given this, we believe any added registration scheme would unnecessarily complicate matters for South Australian manufacturers and add costs during a time of extreme hardship.

As such, AAAA recommends that further consultation take place. Any future consultation should be separated to examine the impacts and needs specifically for non-construction engineer registration. AAAA welcomes the opportunity to be part of this process.

In its current form, as outlined in the discussion paper, AAAA cannot support the expansion of this scheme to non-construction sectors.

The Australian Automotive Aftermarket Association is the peak industry association representing automotive parts manufacturers, replacement and service auto parts distributors, wholesalers, importers and retailers of automotive parts and accessories, tools and equipment, and providers of vehicle service, repair, and modification services in Australia. Our industry supports car owners after the purchase of the car - keeping their vehicles safe and providing products for modification to make vehicles fit for purpose, including trade and emergency vehicles.

For any questions relating to this submission, please contact the AAAA Director of Advocacy and Government Relations Lesley Yates at (LYates@aaa.com.au).

Kind Regards,



Stuart Charity