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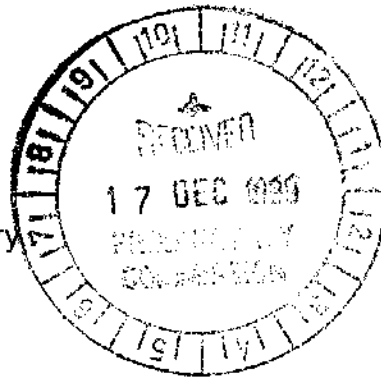
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The Commissioner  
The Productivity Commission Architect Inquiry  
LB2 Collins Street  
EAST MELBOURNE VIC 8003



Dear Commissioner,

I write to influence your inquiry into the relevance of registration of Architects in Australia.

It is true that Architects registration only protects the usage of the name, and not the activity as registration of builders, electricians, plumbers and painters does.

To my mind you can provide sensible protection for the community against incompetent building design only through a registration system, or alternatively you have a myriad of public or private enterprise inspectors allowing any person to perform the complex design functions which are required by planning law and the BCA. Registration has always been the cost effective option.

The key reasons for retaining registration is:

- Common law negligence claims are based on the reasonable expectation of a profession – but you must define the profession to protect the public.
- Registration or legal recognition defines the relevance of the profession to be community.
- Registration, if not continued for Architects will be transferred to other building areas such as building surveyors – with a consequent diminution of generalized knowledge.
- Its always been illogical to enforce registration of builders who construct buildings yet have no control over the design of building
- It is not good enough to cite Codes and expect the Builder to know their meaning – someone has to provide documentation that complies, is rational and consistent with the underlying intent of legislation and the building purpose.

- Registration is not anti competitive – is just ensures a minimum level of competence and skill to gain entry to registration. No one could accuse Architects of unreasonably restricting entry to the profession.
- Professions evolve because their tasks are often complex and difficult to define or to legislate, and reference is made to a standard expected of a member of that profession. To deny this reality would see the dissolution of all the major professions ensuring a form of anarchy prevailing in the business world, particularly in medicine and law.
- The real problem with building regulation is trying to provide a set of rules application to all types of buildings and situations.
- I would say the BCA with all the cited Australian Standards has reached the farcical goal they set themselves some 20 years ago. There is no question that the sanity of an architectural profession is needed, with all the well established expertise in various building types and expert knowledge of local conditions that are brought into play as a matter of course.
- My view is that productivity is best achieved by providing a fair and predictable framework for persons to operate in.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Robert Nicholson', with a horizontal line underneath it.

**Robert Nicholson**  
Architect