

**PRODUCTIVITY COMMISSION INQUIRY  
A REVIEW OF LEGISLATION REGULATING  
THE ARCHITECTURE PROFESSION**

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**RESPONSE TO THE COMMISSIONS ISSUES PAPER**

Thank you for the opportunity of commenting on the Issues Paper, and for being able to discuss these issues with Professor Sloan and her colleagues at the Commission's offices in Belconnen, Canberra.

I write in support of the Royal Australian Institute of Architects' submission to the Commission. In particular, I make the following observations:

1. Self-regulation would be a disaster for the quality of architecture in the Australian community, because adequate measures for self-regulation are impossible for architectural practice in the current industrial and economic environment.
2. It is now essential to recognise that the rhetoric of 'self-regulation' is ideological driven, and works against the development of communities concerned for ethical practice in a rapacious economic environment.
3. That the regulatory system now in place should be amended to reflect its place in the international recognition and regulation of architects. I encourage the RAIA's support of the UIA's involvement in regulatory practice in Australia. I am supportive of Recommendation 4 page 28 of the RAIA's response to the Issues Paper, which recommends accreditation by an independent authority with participation of relevant interested parties.
4. Such recognition and regulation with international parity will be of considerable financial and personal benefit to Australian citizens, especially young graduates from

architecture schools in Australia, and will raise the profile of Australian architectural practice in an international context.

5. Accreditation in association with the Boards of Architecture, the RAIA, and with the UIA of architecture programs in Australia, especially of post-graduate fee paying masters degrees in architecture will provide a significant market opportunity for Australian schools of architecture. This is especially important at a time when government funding to architecture programs has been drastically affected by cutbacks to the tertiary sector by recent Labour and Liberal federal governments.
6. The growth of 'building designers' lobby groups in recent years, and their attempts to expand their services into areas for which drafting services are singularly unqualified to deliver, has distorted the cultural place of the practice of architecture in Australia. This is part reflected in the language and terms of reference of the Productivity Commission. The attempt to reduce the issues regarding the regulation of architects simply to regulation in a flat market place (see for example, the section 2.1 'The market for architects') is too narrow a framework to accommodate all the attendant social and ethical issues associated with the regulation of architects and the production for our society of an high quality built environment.
7. The accrediting procedures for architecture schools in Australia works well at the moment. There is recognition of the interests of government and of the profession through the separate participation of the various Boards of Architecture, the RAIA, and from visiting academics from other states. A departure from this balance of interests would significantly weaken this accreditation procedure.
8. The regulation of architects has proved to not deliver high standards of remuneration for architects in Australia, which has weakened the place of architecture in Australian culture, while supporting highly competitive fee structures in architectural practice.
9. I would rather see an increase in regulatory practice than its diminution. I especially recommend greater participation of architects in the approval process of local government. Any plan submitted to a local government authority should have the involvement and the signature of a registered architect, as is the case in many European countries. The current practice benefiting poorly qualified drafting and building design services should be curbed, where architectural excellence is the lowest priority of a non-professional service.
10. An architect registered in one state or territory of Australia should have the automatic right of being registered in any other state or territory in Australia, with minimal changes to the existing regulatory arrangements.
11. The regulation of the title 'architect' and 'architectural' is essential to maintain the quality of a sustainable architecture for future generations of Australians. The actions of the market alone cannot deliver such a sustainable architecture. The economic and social environment in which architecture is practiced, and which cannot be reduced to

the rhetoric of a liberal market-place, requires government intervention in the form of subsidies through the taxation system, and through regulation of architectural practice in Australia, for the sake of the greater good.

- Stephen Frith