

WA

20 December 1999

Productivity Commission
Architects Inquiry
LB2, Collins Street East
MELBOURNE VIC 8003

Dear Commissioners

I have lost count of the number of reviews, inquiries, studies and investigations et al relating to whether or not the profession of architecture should or should not be regulated.

Having seen the "here we go again" papers relating to the latest review, my initial reaction was to add them to my some 200 high "DEREGULATION" pile and leave it at that.

Subsequent reflection on the somewhat minor nature of the public advertisement and the unrealistically short period available for initial submissions, at least by the public; (and we are or should be dealing with the PUBLIC INTEREST) which I initially thought resulted from the Productivity Commission, having drawn the short straw, wanting to get the matter over and done with to get on with more productive matters; changed my view.

There is also an additional element in the latest exercise which in my opinion requires careful examination, albeit futile as it seems to me to be.

Because of the vast amount of documented information already in existence my submission is only intended to register my views on what I consider the salient issues which I believe are:-

COMPETITIVENESS

Following an extensive and detailed examination of the architectural profession the '1992 Study by the Trade Practices Commission as part of a study of competition in markets for professional services concluded-

"The Commission concludes that the architectural profession's regulatory arrangements do not generally inhibit competitive activity in the market for building services."

CONSISTENCY/UNIFORMITY

In August 1992 representatives of the State and Territory Boards of Architects meeting as the Architects Accreditation Council of Australia Inc. (AACA) agreed in principle to National Legislative Guidelines for Architects Acts in Australia.

These Legislative Guidelines were reviewed in 1998.

State and Territory Boards were reviewing their Acts which apart from some administration matters were essentially consistent, in order to attain uniformity, when these processes were interrupted by the application of the Competition Principles Agreement process most notably to me by the debacle that occurred in Western Australia.

Reciprocity between States and Territories and New Zealand existed and operated satisfactorily well before introduction of Mutual Recognition and the Trans Tasman Mutual Recognition Agreement.

ALTERNATIVES

Whilst I contend that the existing legislation is in the PUBLIC INTEREST and does from time to time warrant review, I consider there is an avenue to satisfy and expedite the call for National Legislation.

The AACA has operated for a considerable time efficiently, economically and generally in a co-operative and amicable manner.

I suggest national legislation to formalise the activities of the AACA while in the interim allowing the States and Territories Boards to resume and fulfil their statutory activities.

In my opinion it would be most inappropriate and undesirable for the Royal Australian Institute of Architects (RAIA) to have any role in regulation or registration of the architectural profession. It should be noted that the RAIA of its own volition withdrew as a constituent body of the AACA in 1996.

I would welcome the opportunity to elaborate on the above views at a public hearing.

Yours faithfully

(signature)

JOHN KOIVISTO