

**Submission to the Review of Australia's Mutual Recognition Scheme for Workers
Chartered Institution of Building Services Engineers (CIBSE)**

May 2026

Introduction

The Chartered Institution of Building Services Engineers (CIBSE) very much welcomes the opportunity to respond to the Review of Australia's Mutual Recognition Schemes for Workers.

CIBSE is the leading global body for building services professionals, driving sustainability, innovation and excellence across the built environment. Through our 24,000-strong international membership (with over 1000 in Australia) and over 80 industry-leading patron organisations, CIBSE empowers and equips building services engineers with the knowledge, research, training and technical guidance needed to deliver safe, energy efficient and high-performing buildings and homes.

As well as being a licensed Professional Engineering Institution (PEI) with the Engineering Council, we are an approved entity to carry out assessments for Mechanical and Electrical Engineer Registration on behalf of the Board of Professional Engineers Queensland and for registration and endorsement with the Business Licensing Authority in Victoria. We have a significant membership base within Australia with a very active community of volunteers which has been active for many years delivering technical and CPD content across the country for thousands of professional engineers.

In addition to being a global technical authority on building services engineering, we also administer very active 'Societies' for Light and Lighting, Vertical Transportation, Digital Engineering, Public Health (Hydraulic) Engineering and Façade Engineering. Through our license with the Engineering Council we have active mutual recognition agreements across the world including Hong Kong and the USA. We believe passionately in the recognition and assessment of competence for professional engineers and greatly encourage global mutual recognition of these assessments.

CIBSE greatly supports improved labour mobility within Australia. However, based on our global experience, the effectiveness of mutual recognition schemes within the country is constrained by inconsistencies in regulatory frameworks and professional standards across jurisdictions.

We believe that mutual recognition schemes can be very effective with the right systems in place and, to that end, we have collated our considerations against the themes raised in the May 2026 Consultation update, which are outlined below.

Impact and Effectiveness

Working across jurisdictions

While mutual recognition aims to simplify mobility, engineers still encounter multiple registration requirements, inconsistent interpretations of scope, and uncertainty in practice. This reduces the practical benefit of the schemes and leads many professionals to maintain multiple registrations rather than rely on mutual recognition.

For example, straightforward mutual recognition does not exist between the States. The requirements for CPD assessment, for example, mean that a professional engineer who has been assessed in one State still has to undergo an assessment in another State, despite there being mutual recognition in place.

Economic costs

The aforementioned situation thus introduces duplication in fees and administrative effort and can delay or prevent the cross-jurisdiction mobility of skilled professionals. These factors reduce productivity and limit the ability to respond efficiently to national skills shortages and project demand. The current system does not offer a timely or efficient model of labour movement within Australia.

Safety and consumer protection

Engineering work directly affects life safety and critical building performance. Variations in competency frameworks and regulatory scope across jurisdictions create risks where equivalence is unclear, potentially undermining consumer protection. The existing system of registers does not offer the consumer a clear understanding of who is qualified, where or how, and this presents risks to the wider population and potentially undermines the integrity of professional engineers within Australia.

Sectors benefiting

Mutual recognition appears more effective in tightly defined trades. In contrast, professional engineering roles are complex, multidisciplinary and global, limiting the benefits of mutual recognition due to inconsistent regulation and competency expectations.

Implementation and Alignment

Question 9: How do delays, differences in regulatory approaches, and local law requirements between jurisdictions undermine the effectiveness of mutual recognition schemes?

The experience of CIBSE members in Australia is that implementation of professional recognition varies significantly between jurisdictions in scope, competency assessment and registration types. There are differing criteria in some States to others, and varying processes in different States. These differences are often not clearly communicated and are difficult to justify relative to risk.

These inconsistencies create delays, duplication and time and cost inefficiencies. Organisations operating nationally must maintain parallel compliance processes, reducing workforce flexibility and increasing costs.

There is limited harmonisation across licensing systems, particularly in definitions of engineering services, competency requirements and CPD. This makes cross-border work more difficult and ultimately reduce overall confidence in equivalence from engineers and consumers.

Experience of Workers/Professionals

Question 12: What regulatory practices or tools have most effectively supported workers to navigate MR or AMR?

It is important for professional engineers to be able to understand clearly what they need to do to be able practise in the different States. Competency, CPD and any other regulatory expectations need to be consistent and clear. Moreover, the process in which a professional engineer is required to follow to meet and exemplify these expectations must be clear and transparent.

In the existing landscape, engineers face barriers including multiple registrations, duplicated fees, and unclear regulatory obligations. These factors discourage movement of skilled professionals. Information is fragmented across jurisdictions and not easily accessible, requiring direct engagement with regulators and limiting transparency.

Notification pathways are under-utilised due to inconsistency and lack of clarity, with full registration often preferred for certainty. Furthermore, regulatory authorities vary in interpretation and support, leading to inconsistent outcomes and reduced effectiveness of mutual recognition.

Question 13: What aspects of Australia's mutual recognition schemes are most difficult to understand or contain the most significant information gaps?

In our experience as a recognised assessment body for Electrical and Mechanical Engineers, workers are not always aware that mutual recognition schemes between the states exist or how/where to apply.

Opportunities to Strengthen and Streamline

Question 14, c) Do the schemes work effectively for licensing regimes based on skills or competencies (rather than occupational)?

As stated in this response we do not consider that the current mutual recognition practices work effectively for professional engineers who are required to demonstrate their competencies to achieve professional recognition. There are inconsistencies across the existing schemes with differing requirements from different schemes which means a professional engineer cannot, in straightforward fashion, mutually recognise their hard earned registration across boundaries.

Competency assessment is, globally, a fundamental part of registration for professional engineers, especially for those who desire mobility both within their own country, and across the world – something we see growing with pace. Organisations and individuals within building services are looking to operate across global boundaries more than ever before. Having a system of mutual recognition within Australia that is efficient and effective would greatly support both the professional engineers and their organisations.

The potential for a national licensing framework

We believe that there is opportunity to amend the current mutual recognition system for professional engineers in Australia and propose the following:



CIBSE

91-94 Saffron Hill, London,
EC1N 8QP, United Kingdom
+44 (0) 20 8675 5211

One National Framework

We believe that a single framework is required in Australia for professional registration of engineers. This should be a nationally consistent framework which includes aligned competency requirements, definitions of practice and ongoing professional standards.

We believe this framework should be administered by organisations who have the infrastructure in place to be able to assess current and ongoing professional competence, and that there should be a variety of organisations able to do this in order to cover the varied types of professional who will need to be covered by this framework as well as the numerous sectors in which professional engineers operate.

National Register/Licence

We believe that digital tools should be utilised to develop a single, national register and centralised platform to ensure full transparency, reduced duplication and to support both national and global mobility of professional engineers. This will support, and give confidence to, individuals, industry and consumers alike.

This would give the individual professional engineers a 'register once, practice anywhere' model, fully supported by strong and consistent competency and professional development standards

Global Mutual Recognition

Any framework for registration should also work on a global scale. International recognition of competency frameworks is a key part of the globalisation of engineering and the increasing global platform that many engineers and engineering organisations will work on. Having clear mutual recognition policies and procedures should be a key component of any future Australian registration model. Not only does this support the mobilisation of engineers but ensures Australian engineers continue to have a global standing and reputation.



CIBSE

91-94 Saffron Hill, London,
EC1N 8QP, United Kingdom
+44 (0) 20 8675 5211