

Design and Building Practitioners Regulation 2020

Stakeholder Feedback Template Form

This template has been designed to help you make a written submission as part of the public consultation on the Design and Building Practitioners Regulation 2020.

The template contains three sections to guide stakeholders to providing feedback on:

- [Regulatory Impact Statement](#)
- [Draft Design and Building Practitioners Regulation 2020](#)
- [Draft Continuing Professional Development Guidelines for Prescribed Practitioners](#)
- [Draft Continuing Professional Development Guidelines for Professional Engineers](#).

Your Name: Simon Fagg
Organisation Name: Shirley Consulting Engineers Pty Ltd
Date: 11 January 2021

About you

Shirley Consulting Engineers is a specialist Forensic Civil and Geotechnical Engineering firm which specialises in the investigation of failed ground engineering structures and soil structure interaction problems.

The firm's Principal's conduct investigations of failed structures, and subsequently give expert evidence to assist Courts in determining the cause of the failures.

Some high profile matters the firm has been engaged in include:

- a) The 1997 Thredbo Landslide, which resulted in the loss of 17 lives on 30 July 1997.
- b) The failure of a shoring system for a Class 2 building on 6 March 2008 on Botany Road in Alexandria. This failure resulted in the closure of Botany Road for several months and the consequent passing of the *State Emergency and Rescue Management Amendment (Botany Emergency Works) Act 2008 No. 8* to allow the department of Commerce to undertake stabilisation works to reopen Botany Road
- c) Are currently assisting the Owner's Corporation of Mascot Towers with their investigation and claims for damages.

We note that we are generally supportive of the reforms, but consider that they do not go far enough and the registration of engineers should be extended to include both Class 1 and Class 10 structures.

We also note that under the currently proposed regulations, we would not be required to become a registered professional engineer, despite being of the opinion that this should be required.

In relation to my personal experience, I note that:

1. I have a Bachelor of Engineering (Civil) degree from the University of Sydney.
2. I have a Bachelor of Science (Geophysics) degree from the University of Sydney.
3. I have 18 years of experience as a forensic civil and geotechnical engineer, with this experience being concentrated on the investigation of failed and collapsed civil engineering structures and the subsequent design of remedial works.
4. I was appointed as a director of Shirley Consulting Engineers on 1 July 2015.
5. I am the current Chairman of the Engineers Australia's, Civil & Structural Panel (Sydney Division).

Regulatory Impact Statement (RIS)

Please use this section to provide feedback on the RIS. The questions from the RIS have been reproduced here for convenience. Page numbers in brackets refer to the section in the RIS.

Scope of reforms (page 15)

1. Do you think the reforms should be expanded to other types of buildings over time? Why/Why not? If so, which types of buildings do you think should be next?

The reforms must be expanded to cover Class 1 and Class 10 buildings because:

- a) Residential Owner / Occupiers of Class 1 buildings are in our experience, the most vulnerable property owners to defects, and those least capable of assessing or managing the risks associated with their construction. In addition, they are also normally the most financially constrained property owner.
- b) A person wanting to engage a building professional for a Class 1 building, currently has no mechanism or system available to check on the experience, qualification or competence of the building practitioners they want to engage.
- c) The proposed system for registration of Building Practitioners for Class 2 buildings will be of little benefit to residential consumers directly, as building practitioners for this class of structure are normally engaged by a developer. As such, whilst the system may be of some benefit to smaller consumers, and will in the medium to long-term list

the standards of the engineering profession, it will not have an immediate or direct impact on consumers.

Finally, we are of the opinion that there is a major omission within the current reforms in relation to the rights of neighbours to these developments, and the protection of their property.

Under the current planning and approval system, at the time that a development application is lodged is the only time that a neighbour can comment on, or provide objections to a development. At this early stage, engineering designs are normally not prepared, and the excavations are given little consideration during the approval process [e.g. the neighbouring development to Mascot Tower].

At the time that the construction certificate is prepared, a Council condition *may* require that the developer notifies the neighbour of plan excavations, but they are given no opportunity to object to inadequate or inappropriate designs that may cause serious damage to their property.

As such, further reforms must include provisions for neighbours of excavations to comment or object to the designs of excavation support or shoring systems prior to the issue of the construction certificate.

2. Do you agree that the reforms should only apply to existing arrangements where the Complying Development Certificate or Construction Certificate has been applied for on or after 1 July 2021? Why/Why not?

Yes we agree that any changes should not be retrospective.

Registration of Compliance Declaration practitioners (page 23)

5. Do you support the proposed classes of Design Practitioner? Why or why not?

We support the proposed classes of Design Practitioner. We are of the opinion that the classes are appropriate for the design of Class 2 buildings.

We also note that members of the Australian Geomechanics Society [AGS] are being encouraged to provide a submission that either:

- a) The **Design Practitioner – Geotechnical Engineer** should be renamed to Design Practitioner – Ground Engineering, and include Engineering Geologists. or
- b) An additional category Design Practitioner – Engineering Geologist be created.

We do not support either including Engineering Geologists in the category of geotechnical engineer, or the creation of a separate category for engineering geologists for the following reasons:

- i) a geotechnical engineer would typically provide recommendations on the type of shoring system required for the excavation for, and foundation type necessary to support, a Class 2 building.
- ii) an engineering geologist may provide information on the ground conditions to assist the geotechnical engineer, but in our opinion does not have adequate experience or qualifications to provide the engineering recommendations on the 'building element' / structure of the shoring system or footing system.
- iii) Excluding engineering geologists would not prevent them performing their current services to assist geotechnical engineers to arrive at those recommendations.
- iv) Shirley Consulting Engineers has many been involved in multiple cases where engineering geologists have made inappropriate recommendations on the shoring system and footing systems for buildings, with consequent major damage.

6. Are there other types of Design Practitioners that should be included or any that should be removed? If so, what are they and why?

It is not clear currently what the class Design Practitioner – Building Design (Restricted) would cover.

7. Do you support the proposed qualification, skills, knowledge and experience requirements for each class of practitioner? Why or why not? Please make suggestions for additional or alternative requirements.

In our opinion, the five years of experience required for registration is insufficient, and should be increased to 10 years for the following reasons:

- a) Being the lead designer of a major component of a multi-storey building requires significant technical knowledge and experience.

- b) Five years after graduation for university is insufficient time to gain the breadth of knowledge necessary to assess all the elements required.
- c) Having the larger time for registration does not prevent younger / less experienced engineers from completing significant design work on these projects – they simply require supervision from a more experienced engineer in the relevant category.
- d) The design of such large buildings, if undertaken to an adequate level, is not something that can be completed by an individual and requires a team. As such, we do not think 10 years experience is restrictive.
- e) If the requirement was for the design of Class 1 buildings, then five years would be appropriate.

8. Other than qualifications, skills, knowledge and experience requirements, are there any other eligibility criteria that applicants should meet to be eligible for registration?

One of the principal problems which have led to the state of the current building industry is a failure of Design Practitioners, amongst others, to recognise that in addition to the organisation paying their invoices, the design practitioner has a responsibility and duty to the ultimate end users of the buildings. This is an ethical requirement, with it often being noted that those that lack this ethical understanding are arrogant individuals.

Therefore, prior to registration there should be a interview process to ensure that the design practitioner has an understanding of their ethical duties and responsibilities, in addition to the qualifications, skills, knowledge & experience requirements.

Whilst we appreciate that at the time of implementation of this scheme, it would not be possible to interview all the applicants, after the transitional period we would recommend that all applications for registration include an interview process.

9. Do you agree that practitioners should be required to have 5 years of recent and relevant practical experience?

10. Some classes of practitioner have been proposed with authority to work on low and medium rise buildings? Do you support this approach?

Yes.

Registration of Professional Engineers (page 29)

11. Are there any other areas of engineering that should be captured for the purposes of designing or constructing a class 2 building, or a building containing a class 2 part?

No, and we repeat the comments under Question 5.

12. Do you support a co-regulatory approach for the registration of engineers?

No. Registration must be managed by a State Government body. Whilst Engineers Australia or similar organisations should be organising relevant CPD events and ongoing education, the Registration and Discipline must remain under the direct control of a State Government body.

13. Pathway 1 will require an engineer to satisfy certain qualifications, skills, knowledge and experience requirements. Are there any other eligibility criteria that engineers should meet before being registered?

We repeat the comments under Section 8, and note that an interview process to ensure that an applicant has an adequate understanding and acceptance of their ethical responsibilities

14. The Regulation proposes recognition of Washington Accord accredited qualifications. Do you think this is appropriate? If not, what alternative approach do you suggest?

We think that Washington Accord degrees are an appropriate way to recognise international qualifications. However, where international qualifications are used for registration, at least five years local [i.e. Australian] experience should be included in the qualifications.

15. Under Pathway 2 what criteria do you think the professional engineering body should satisfy to be eligible to perform their function?

We do not support registration through approved bodies [i.e. outsourcing of the registration management] . Whilst in principal Professional Bodies can adequately manage the process, in our opinion a 'Conflict of Interest' is formed with the organisation being also tasked to

increase the number of their members. As such, there will be a corporate pressure to overlooking the compliance and auditing inconsistencies.

The Professional Body has a responsibility for organising CPD and other ongoing education standards, and setting degree requirements etc. This should not be conflated with auditing and enforcement activities.

16. Would you be supportive of professional bodies developing a PSS for Pathway 3 to be available?

We would not be supportive of a PSS scheme, unless the Professional Standards Council is completely overhauled, and the existing management team of the Professional Standards Council replaced.

The College of Investigative and Remedial Consulting Engineers of Australia [*CIRCEA*] had been a member of a PSS for over 20 years, and exited the PSS on 27 February 2018.

Despite the rhetoric of the PSC, the lived experience of being within a PSS indicated that:

- a) The PSC is purely a bureaucratic organisation, which provides no benefit to either any member within the PSS, or to the public.
- b) The PSC was not willing to assist in advocating for the importance of working under a PSS, including within government departments [including state and local government].
- c) Being a member of the PSS was detrimental to our organisation, and prevented work opportunities to state and local government agencies due to the cap on Liability.
- d) The suggestion that a project specific increase in the cap could be negotiated with government departments is not consistent with our experience, nor how it would work with the current PSS legislation which cuts liability [i.e. creating a project specific on liability, which is statutory not contractual].
- e) The public/general consumer had no knowledge of the PSC or PSS's, and in our experience placed no value in the system.

It is not clear how any of these issues would be resolved under the currently proposed regulations. As such, until these issues are addressed, we do not support a PSS for engineering services.

17. Do you agree that Professional Engineers should be required to have 5 years of recent and relevant practical experience?

No, for the registered engineer we think that a minimum of 10 years of relevant experience is necessary, with at least 5 years of local experience [e.g. an engineer with 20 years experience in the United Kingdom, should not be eligible to immediately work in Australia without local supervision, until they have gained sufficient experience with the NCC].

18. Do you support the proposed generic list of skills and knowledge requirements for all classes of engineering (excluding fire safety)? If not, please outline what you think the specific skills and knowledge for each class of engineer should be.

We support the generic list of skills and knowledge requirements for all classes of engineering excluding fire safety and geotechnical engineering.

In relation to geotechnical engineering, it is important that the registered engineer have experience with the local ground conditions. This is because the behaviour of the ground materials in the Sydney area, behave differently to the ground materials in Moree, and differently to the ground materials around Thredbo.

As such, in addition to the generic list of skills and knowledge, the class of Professional Engineer – Geotechnical Engineering should include a requirement of at least two years experience in an area's geology.

The NSW Areas of Geology that could be included as a note on the registration could be as follows:

Greater Sydney [Wollongong to Newcastle, west to Lithgow].

North Coast [Newcastle to Qld Border]

South Coast and Blue Mountains [Wollongong to Vic border, west to Blue Mountains].

Western Region [Rest of NSW]

There may be more regions, or other ways to define the areas [e.g. LGA's] that would be easier for administrative purposes.

Compliance Declaration Scheme: practitioner requirements (page 38)

19. Do you support the proposal that all construction issued regulated designs must be lodged before any building work can commence? Why or why not?

No.

For the purposes of new construction of a Class 2 building design, yes.

However, for the purpose of remedial design, the destructive investigation needed to finalise a design may result in a prolonged period of unusable space / services whilst the design is prepared.

Remedial design by its nature is both investigative and remedial at the same time. As some of the Building Work involved in the investigation [i.e. partial demolition], this Class of work should be excluded from lodgement prior to any building work commencing.

20. Do you support the Building Practitioner being primarily responsible for lodging regulated designs on the NSW Planning Portal? Why or why not? If not, who do you think should be responsible at the different lodgement points? Please explain your answer.

Yes

21. Do you support the matters covered in the Design Compliance Declaration? Why or why not?

22. Do you consider any other matters should be included in the Design Compliance Declaration?

There does not appear to be any requirement to list in the Design Compliance Declaration the specific Development Approval Conditions that the design complies with or considers. These requirements should be stated and confirmed in the declaration.

23. Do you support the proposed title block? Are there any other matters that should be included in the title block?

No, because:

- a) As stated in the RIS, not all designs are shown on drawings. They include reports and other written documents that are not appropriate for the title block.
- b) Creating a generic title block removes freedom from the design of the drawing sheet.
- c) There is likely to be additional information needed in some circumstances [e.g. Report References, Specification references etc] which are not included.

24. Do you support the title block being available in a .dwg format?

No. This would allow registered designs to be altered after being signed by the Design Practitioner, as there is no mechanism to 'lock' or 'seal' the .dwg file.

25. Do you support the proposal that varied regulated designs be lodged within 1 day of the building work being commenced? Why or why not?

No, 2 working days is a more reasonable timeframe.

26. Do you support the proposal that the Building Compliance Declaration, regulated designs and variation statements be lodged prior to the application for the Occupation Certificate? Why or why not?

Yes. All documentation should be lodged prior to the application for the Occupation Certificate. All work should be completed before the Occupation Certificate application is made.

27. Are there further matters that should be included in the Building Compliance Declaration? If so, what are they?

There does not appear to be any requirement to list in the Design Compliance Declaration the specific Development Approval Conditions that the design complies with or considers. These requirements should be stated and confirmed in the declaration.

28. Are there further matters that should be included in the Principal Compliance Declaration? If so, what are they?

Insurance (page 51)

29. Do you support the approach proposed for insurance requirements for Design Practitioners and Professional Engineers? Why or why not?

For most categories of Professional Engineers, excluding Geotechnical Engineers, the cover required should be a function of the value of the building structures upon which they are providing advice.

The level of cover should then be assessed as part of the Development Application process, and set out as a condition of Development Consent. This would then allow the PCA to confirm that adequate cover is available before issuing the Construction Certificate.

For the class of Professional Engineer - Geotechnical Engineer, in addition to the building for which the 'design' / advice is being provided, there also needs to be

adequate cover for major damage to surrounding properties, especially where excavations are proposed.

A geotechnical risk assessment should be required as part of the Development Application process, which includes estimates of a total rebuilding cost of surrounding properties.

The problem with this approach is that, if these risk assessments are carried out in inner-city areas, insurance cover for total losses would currently approach or exceed \$200 million dollars for many developments.

For example:

- a) A total loss of Mascot Towers may be \$80 million.
- b) Shirley Consulting Engineers were involved in investigating an excavation failure in Brisbane (Newstead) in 2015 where five surrounding buildings were significantly damaged [total loss could be over \$200 million].

This level of cover is unlikely to be available to any geotechnical engineering organisation in NSW.

Consequently, in the alternative, where the Risk Assessment identifies that the costs of remediation of neighbouring properties exceeds the insurance cover of the Geotechnical Engineer, the developer should be required to have a Peer Review panel [consisting of 1 to 3 independent Geotechnical Engineers] review the requirements of the report prior to Development Application approval.

Subsequently, the excavation support system / shoring design should be reviewed and approved by the Independent Panel prior to the issue of the Construction Certificate.

The number of members of the Panel should be a function of the Risk Assessment value of a total loss of the surrounding properties on a sliding scale relative to the PI cover.

e.g. One peer reviewer for the reconstruction cost being between PI Limit and \$10 million.

Two peer reviewers for the reconstruction cost being between \$10 million and \$50 million.

Three peer reviewers for the reconstruction cost being over \$50 million.

30. Do you consider additional insurance requirements should be prescribed for Design Practitioners and Professional Engineers? If so, what?

- 31.** Do you support the proposed transitional arrangements that exempt Building Practitioners from being insured for issuing Building Compliance Declarations? Why or why not?

Continuing professional development (CPD) (page 54)

- 32.** Do you support the proposed CPD requirements for Design and Building Practitioners? Why or why not?

No, because the proposed 30 minute recording blocks and points system:

- a) Discourages undertaking most of the Continuing Professional Development activities in which engineers are engaged in [i.e. reading technical literature and standard updates].
- b) Reduces the auditability of records. Many technical articles only take 10 to 15 minutes to read. Under the current Engineers Australia CPD requirements, you are required to record the title of the article that you read. Such recording would not be allowed [0 points] under the proposed system. Consequently, either:
 - i) Reduced recording [i.e. the name of a Journal] will be recorded, rather than the specific article.
 - ii) The time will be inflated to record CPD points.
- c) We have for many years used our Timesheet recording system [0.1 hour blocks] to record CPD time. This is likely to be similar to many engineering consultancies. These time blocks should be allowed in the 'Points' system.

The CPD requirements also state that “*activities already undertaken in the normal course of practice or employment*” are excluded. If a normally in-house weekly training course is attended as part of the employment, this would appear to be excluded from the CPD points system.

There is no mandatory CPD topic area of Legal Responsibilities and Ethics. The building industry has ‘gone downhill’ because too many building professionals have forgotten their professional and ethical responsibilities. Therefore, a CPD topic area on Legal Responsibilities and Ethics should be added with a minimum of 5 hours / points annually on this topic area.

Finally, the CPD year should be redefined to be either the Calendar Year or Financial Year. Registration is most likely to continue for decades for the professional. The first / last year of registration should be pro-rated.

Having the CPD year for each registered Professional Engineer also complicates internal systems for auditing of engineers with a firm.

33. What types of training, education or topic areas would be relevant for the functions carried out by Design and Building Practitioners?

34. Do you support the proposed CPD requirements for engineers under pathway 1?

No, see the response to Question 32.

Specifically:

- a) The minimum reporting block should be reduced to 0.1 hours [i.e. 6 minutes].
- b) A CPD topic area on Legal Responsibilities and Ethics should be added.
- c) The CPD year should be redefined to either the Calendar Year or Financial Year.

35. Do you support the mandatory CPD topic areas? Why/why not? Please make any suggestions for amendments and explain why they are necessary.

Yes, however an additional area of **Legal Responsibilities and Ethics** should be added.

There is no mandatory CPD topic area of Legal Responsibilities and Ethics. The building industry has 'gone downhill' because too many building professionals have forgotten their professional and ethical responsibilities. Therefore, a CPD topic area on Legal Responsibilities and Ethics should be added with a minimum of 5 hours / points annually on this topic area.

Penalty notice offences (page 57)

36. Do you support the proposed penalty notice offences and amounts proposed in Appendix 1? Why or why not?

Generally yes.

Penalty under 33(1) Professional Engineer carries out professional engineering work, or holds out adequately insured, without being adequately insured appear to be inadequate and should be increased to be consistent with the other penalties [i.e. \$16,500 and \$5,500].

37. Do you think the proposed penalty notice offences and amounts are fair and reasonable?

Fees (page 59)

38. Do you support the reasons for the proposed fees? Why or why not?

Yes.

39. What do you think NSW Fair Trading should consider in determining the fees?

The costs of any fees charged will be passed on to Consumers through higher engineering fees being charged.

40. Are you interested in being involved in targeted stakeholder consultation on fees?

Yes

Proposed Design and Building Practitioners Regulation 2020

Please use this section to provide feedback on the proposed Regulation. Headings have been included to assist you in providing feedback on particular topics covered in the Regulation.

- 1. Part 2 – Regulated designs and types of work**
Requirements for regulated designs and compliance declarations, building work and professional engineering work
- 2. Part 3 – Requirements for designs and building work**
Lodgement of designs and compliance declarations, requirements of principal design practitioners and building practitioners
- 3. Part 4 – Registration of practitioners**
Applications and conditions of registration and registration obligations
- 4. Part 5 – Recognition of professional bodies of engineers**
Applications and requirements for recognition or registration scheme
- 5. Part 6 – Insurance**
Insurance for design and principal design practitioners, professional engineers, building practitioners and adequacy of cover
- 6. Part 7 – Record keeping**
Record keeping for design and principal design practitioners, professional engineers, building practitioners
- 7. Part 8 – Miscellaneous**
Authorised and penalty notice officers, exchange of information, transitional arrangements for insurance for building practitioners and qualifications for fire system designers and work done under existing arrangements.

- 8. Schedule 1 – Classes of registration**
Classes of registration for practitioners and scope of work
- 9. Schedule 2 – Qualifications, experience, knowledge and skills**
For building practitioners, design practitioners, principal design practitioners and professional engineers
- 10. Schedule 3 – Continuing professional development**
CPD for prescribed practitioners and CPD for professional engineers
- 11. Schedule 4 – Code of practice**
Code for prescribed practitioners and code for professional engineers
- 12. Schedule 5 – Penalty notice offences**
- 13. Schedule 6 – Forms**
Design Compliance Declaration
- 14. General feedback**
Any other comments you would like to make on the proposed Regulation.

Proposed Continuing Professional Development Guidelines (CPD Guidelines)

Please use this section to provide feedback on the proposed CPD Guidelines. There are two Guidelines we are seeking feedback on:

- 1. CPD Guidelines for prescribed practitioners (design practitioners, principal design practitioners and building practitioners) and,*
- 2. CPD Guidelines for professional engineers.*

Questions have been included to assist you in providing feedback.

CPD Guideline for prescribed practitioners

1. Do you consider that requiring practitioners to undertake three hours of CPD activity is appropriate? Why or why not?
2. Do you support that CPD activities must be from the approved platforms? If not, please explain why.
3. Do you support the guidelines prioritising technical CPD activity (i.e., improving knowledge and understanding of the National Construction Code and Building Code of Australia) over other CPD activities? If not, please explain why.
4. The Department is working with industry to develop courses that would assist practitioners. What courses or topic areas should be developed and available on the Construct NSW Learning Management System? We are particularly interested in providing courses that cover gaps in current learning content.
5. Are there any other general comments you would like to make on the Continuing Professional Development Guidelines for prescribed practitioners?

CPD Guidelines for professional engineers

1. Do you support the proposed CPD structure and allocation of points? Why/why not?
Please make any suggestions for amendments and explain why they are necessary.

No, because the proposed 30 minute recording blocks and points system:

- d) Discourages undertaking most of the Continuing Professional Development activities in which engineers are engaged in [i.e. reading technical literature and standard updates].
- e) Reduces the auditability of records. Many technical articles only take 10 to 15 minutes to read. Under the current Engineers Australia CPD requirements, you are required to record the title of the article that you read. Such recording would not be allowed [0 points] under the proposed system. Consequently, either:
 - iii) Reduced recording [i.e. the name of a Journal] will be recorded, rather than the specific article.
 - iv) The time will be inflated to record CPD points.
- f) We have for many years used our Timesheet recording system [0.1 hour blocks] to record CPD time. This is likely to be similar to many engineering consultancies. These time blocks should be allowed in the 'Points' system.

The CPD requirements also state that "*activities already undertaken in the normal course of practice or employment*" are excluded. If a normally in-house weekly training course is attended as part of the employment, this would appear to be excluded from the CPD points system.

There is no mandatory CPD topic area of Legal Responsibilities and Ethics. The building industry has 'gone downhill' because too many building professionals have forgotten their professional and ethical responsibilities. Therefore, a CPD topic area on Legal Responsibilities and Ethics should be added with a minimum of 5 hours / points annually on this topic area.

Finally, the CPD year should be redefined to be either the Calendar Year or Financial Year. Registration is most likely to continue for decades for the professional. The first / last year of registration should be pro-rated.

Having the CPD year for each registered Professional Engineer also complicates internal systems for auditing of engineers with a firm.

2. Do you support the mandatory CPD topic areas? Why/why not? Please make any suggestions for amendments and explain why they are necessary.

Yes, however there needs to be an additional CPD topic on:

Legal Responsibilities and Ethics

3. Are there any activities that should be included/not included as:

- a) Formal education and training activities?
- b) Informal education and training activities?

4. Structured training courses available from Construct NSW Learning System and from the Australian Building Codes Board are proposed to count for 2 CPD points. Do you support this approach?

Engineers Australia has for many years had a 'weighting' system for CPD activities. Whilst the two systems may be worth extra points, additional formal courses should also be worth 2 points.

5. The Department is working with industry to develop courses that would assist professional engineers. What courses or topic areas should be developed and available on the Construct NSW Learning Management System? We are particularly interested in providing courses that cover gaps in current learning content.

Legal Responsibilities and Ethics

I also note that registration fees should include free access to these learning systems, and not have additional costs associated with access. Additional cost to access courses would discourage use of these systems.

6. Are there any other general comments you would like to make on the Continuing Professional Development Guidelines for Professional Engineers?

The limit of '5 points' for authorship of peer-reviewed articles is inadequate. The writing of these articles typically takes days / weeks to prepare. As such, a greater number of hours should be allowed to encourage knowledge sharing.