



## Australian Institute of Architects

### **OPPOSITION TO THE PROPOSED ABSORPTION OF THE ARCHITECTS REGISTRATION BOARD OF VICTORIA (ARBV) INTO THE BUSINESS LICENSING AUTHORITY**

Prepared by Practice of Architecture Committee (POAC)  
for the Australian Institute of Architects (AIA)

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#### **Executive Summary**

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The Government, through the Regulatory Impact Statement (RIS) of the Architects Act 2026, has proposed to absorb the Architects Registration Board of Victoria (ARBV) - the statutory authority responsible for registering and regulating architects - into a licensing body under the Business Licensing Authority (BLA). This submission argues that such an action would be deeply counterproductive, harming consumers, weakening Victoria's competitive position nationally and internationally, undermining a world-class architectural education sector, and costing taxpayers additional money: all without delivering substantial or meaningful regulatory benefit.

The case against absorption rests on four pillars:

- Loss of independent, profession-specific oversight harms consumers and erodes public confidence in architectural regulation.
- Disruption to national registration and mutual recognition frameworks puts Victorian architects at a competitive disadvantage relative to their interstate peers (8 other states and territories).
- Risk to Victoria's architectural education sector and the future professional workforce, with national and international flow-on effects.
- Increased cost and complexity for government, in direct contradiction to the reform's stated efficiency objectives.

#### **1. The ARBV: An Effective Regulator**

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The ARBV was established under the Architects Act 1991 (Vic) as a specialist statutory authority with a clear mandate: to protect the public through the registration and regulation of architects. Its core functions include:

- Maintaining the official register of architects practising in Victoria.
- Setting, assessing and enforcing professional competency standards.
- Investigating complaints against registered architects and taking disciplinary action where warranted.
- Supporting consumer protection by ensuring that only qualified practitioners use the title 'architect'.
- Accrediting tertiary architectural education courses

As of 30 June 2025, there were 5,675 practising architects on the Victorian Register, plus 1,552 approved companies and partnerships. Additionally at June 2025, there were 2421 non-practising architects which adds some scale and complexity to the ARBV's current registration role.



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***Critically, the ARBV achieves all of this without drawing on the State Budget. It is entirely self-funded through registration fees paid by architects themselves. This is a model of efficient, cost-neutral public administration.***

The Board's composition - including registered architects, consumer representatives and independent members - ensures that regulatory decisions are informed by professional expertise while remaining accountable to the public interest. This balance is impossible to replicate within a generic licensing body responsible for hundreds of unrelated trades and professions.

### **2. Consumer Protection Will Be Weakened**

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When a consumer engages an architect, they rely on the ARBV to have verified that person's qualifications and conduct. A generic licensing authority is structurally incapable of providing the same depth of assurance.

Architecture is not an ordinary trade. Architects are responsible for the safety, accessibility and long-term performance of the built environment; from private homes, multi-residential, commercial, retail, hospitality to institutional, education and public infrastructure. Poor architectural decisions carry consequences that may not manifest for years, and when they do, the cost, both human and financial, can be severe.

**We do not believe that specialist oversight can be replicated in a general licensing body.**

The BLA administers licences across a vast range of industries, from motor car traders, pawnbrokers, rooming house operators to debt collectors. Its regulatory approach is necessarily generic. Folding architectural regulation into this framework would mean:

- Loss of a dedicated complaints and investigation function with profession-specific expertise.
- Reduced visibility and accountability for architectural conduct matters.
- A diminished public register that consumers rely upon to verify that the person designing their home or workplace is genuinely qualified.
- No profession-specific input into the setting and updating of professional standards as the discipline evolves.

The ARBV publishes its decisions, maintains a publicly searchable register, and its performance is assessed against the Minister's *Statement of Expectation* by the Department of Transport and Planning. These transparency mechanisms are intrinsic to its specialist mandate. Absorption into the BLA risks submerging these functions within a larger bureaucracy, making it harder for consumers, the profession and the Minister to scrutinise outcomes.

### **3. Victorian Architects Will Be Disadvantaged Nationally**

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Every other Australian state and territory regulates architects through a dedicated, profession specific statutory authority, but in reality the profession operates nationally. That is why National consistency is so important.

The Mutual Recognition Act 1992 (Cth) and the Architects Accreditation Council of Australia (AACA) framework underpin the mobility of architects across jurisdictions. Victoria's participation in this national system depends on maintaining an equivalent registration regime to that of other states. International Mutual Recognition currently exists with UK, Canada, USA, New Zealand, Japan &



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Singapore where university course and experience is recognised. If Victorian courses are no longer accredited by ARBV, it may be that Victorian architects will lose mutual recognition, meaning they cannot be registered as architects in those countries without starting their courses again. Any change that is not nationally consistent will unfairly impact Victoria, making university courses and registration in other states more attractive; adversely impacting more industries and professions than architecture in Victoria.

If Victoria fundamentally restructures its regulatory model by subsuming architectural registration into a generic business licensing body, it presents a misalignment with the national framework:

- Creating doubt about whether Victorian-registered architects meet the equivalency requirements for automatic mutual recognition in other jurisdictions.
- Requiring Victorian architects seeking interstate registration to undertake additional assessment processes that their counterparts in other states do not face.
- Undermining Victoria's representation in national bodies such as the AACA, which coordinates registration standards and accreditation across Australia.

The freedom of Victorian architects to work across state borders without bureaucratic impediment is not a professional courtesy - it is an economic circuit breaker. When the Victorian construction market contracts (something we are currently experiencing), interstate work helps to sustain practices, retain skilled staff and maintains the professional capacity that Victoria needs for when conditions improve.

Victoria's architects have historically capitalised on major interstate investment cycles – for example the infrastructure surge accompanying the 2032 Brisbane Olympics - to sustain practices and retain staff through periods of reduced local demand. That capacity depends on seamless interstate registration, and it must be protected.

Disrupting that mobility will harm individual practitioners: accelerate redundancies, hollow out firms and erode the workforce pipeline that underpins Victoria's longer-term built environment ambitions. The proposed absorption introduces an unconfirmed but very real risk that Victoria's registration framework will fall out of alignment with the national mutual recognition system - restricting that circuit breaker precisely when architects need it most. A risk that has not been assessed, cannot be quantified, and has not been reviewed or commented upon by the profession is not an acceptable price for an administrative restructure.

### **Impact on international practice**

Victoria's architectural profession also generates significant export value. Victorian firms operate across South-East Asia, the Pacific, the Middle East and beyond. International clients, governments and procurement bodies assess the credibility of foreign practitioners in part by reference to the rigour of the registration system in their home jurisdiction.

A registration system administered by a generic business licensing authority - rather than a dedicated professional board – may send a signal to international markets that Victoria does not maintain world-class professional standards. This reputational damage is difficult to quantify and impossible to undo without permanent damage.



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### 4. Victoria's Architectural Education Sector will be at risk

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Victoria is the leading jurisdiction in Australia for the training of architects at the postgraduate level. This is not merely a matter of professional pride, it represents a significant economic asset and source of skilled migration, particularly given the weight of international students enrolled in Victorian programs. This also is not just our opinion, Victorian Universities out rank other states in architectural excellence.

#### **Victoria's position as Australia's architectural training capital**

Victoria hosts five accredited Master of Architecture programs and produces approximately 43% of all Master of Architecture graduates nationally.

#### **Many of these graduates are international students who choose Victoria specifically because of the perceived quality and international recognition of its professional framework.**

Architectural programs in Victoria are accredited by the AACA and must align with national competency standards. Any disconnect between Victoria's registration framework and the national accreditation system puts Victorian universities at a competitive disadvantage and risks the flow of international students to programs in other states – a direct loss of significant revenue for not only the educational facilities, but for the state of Victoria.

#### **Accreditation alignment under threat**

Program accreditation by the AACA is linked to the registration framework of the host jurisdiction. If Victoria's registration model diverges from the national standard - by absorbing the registration function into a generic licensing body - there is a real risk that:

- AACA may need to review the accreditation status of Victorian programs or impose additional conditions.
- International students may face uncertainty about whether Victorian qualifications will be recognised in their home countries, reducing the attractiveness of Victorian programs.
- The pipeline of domestically trained architects available to address Victoria's acute housing and infrastructure needs will be disrupted.

Victoria's architectural education sector contributes significantly to the State's international education export revenues. Any reform that diminishes the standing of Victorian programs imposes a real economic cost that sits entirely outside the scope of the regulatory efficiency argument being made for absorption.

### 5. The Reform Will Cost Government More, Not Less

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Proponents of absorption may argue it will reduce administrative duplication and deliver cost savings. This argument does not withstand scrutiny.

As a self-funded statutory authority, the ARBV does not draw on the State Budget. Its operating costs are met entirely by registration fees. Abolishing the ARBV and absorbing its functions into the BLA will not save the Government a single dollar - but it will impose new costs.

***This reform removes a cost-free, effective regulator and replaces it with an untested, more expensive alternative.***



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### **The true costs of absorption:**

- The BLA's licensing systems are not configured for profession-specific registration. Building equivalent functionality will require significant investment.
- Transferring staff, institutional knowledge, records and processes incurs one-off costs that will fall on the taxpayer - not on registration fees.
- Repealing or amending the Architects Act 1991 and related legislation requires Parliamentary time and legal resources.
- Gaps in regulatory continuity during transition create legal exposure for the State if registration decisions are challenged.
- Once absorbed into a general body, architectural regulation costs cannot be cleanly separated or cost-recovered from architects alone, creating budget risk.

### **6. Adding Red Tape by Removing It**

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The stated rationale for absorption is administrative efficiency and streamlining. But from the perspective of architects and their clients, the proposed change will be experienced as anything but streamlined.

- Architects will need to navigate a new, unfamiliar licensing system designed for generic trades, not for a complex learned profession.
- The loss of a dedicated complaints process will mean consumers with concerns about their architect face longer resolution times within a larger, less specialised bureaucracy.
- Interstate and international recognition processes, currently smooth under the national framework, will become difficult.
- Architectural firms managing staff across multiple states will face inconsistent registration requirements and additional administrative burden.

**The irony of this proposal? In the name of cutting red tape, the Government would be adding it - for consumers, for practitioners, and for the profession as a whole.**

### **7. The Case for Retention**

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Victoria's ARBV model is not in need of reform. It reflects international best practice for the regulation of learned professions, mirroring the approach taken in the United Kingdom (Architects Registration Board), New Zealand, Canada, and across the United States, where architecture is regulated by dedicated profession-specific bodies.

The hallmarks of effective professional regulation - independence, specialist expertise, transparent accountability, self-funding, and alignment with national and international frameworks - are all present in the ARBV as it currently operates. They cannot be replicated within a generic licensing body.

If there are specific inefficiencies in the current regulatory framework that the Government wishes to address, the appropriate response is targeted reform - not abolition. A genuine commitment to better regulation should preserve what works, fix what does not, and build on Victoria's strengths.



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*New South Wales has already walked this path. In August 2024, the NSW Government proposed consolidating the Architects Act 2003 into a broader 'Building Bill – the same structural logic underpinning Victoria's proposed absorption of the ARBV. The NSW architectural profession opposed the move on the same grounds that we present our argument – loss of specialist oversight, consumer confusion and risk to interstate registration equivalency. The NSW Government listened. Victoria now proposed to repeat a reform that its largest comparable jurisdiction considered, consulted upon – and explicitly rejected.*

### 7. Recommendations

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1. **Oppose any legislation or administrative action** that would abolish the Architects Registration Board of Victoria or subsume its functions into the Business Licensing Authority or any other generic licensing body.
2. **Ensure that any reform to the regulation of architects in Victoria** retains independent, profession-specific oversight, with appropriate governance structures, transparent accountability mechanisms, and self-funding arrangements that protect both consumers and the profession.
3. **Ensure that any reform does not impair the export of architectural services** interstate or overseas, and that Victoria's registration framework remains aligned with the national mutual recognition system administered through the Architects Accreditation Council of Australia.
4. **Ensure that any reform does not adversely affect** the architectural education sector or the future professional workforce, including the integrity of accreditation arrangements for Victorian university programs and the recognition of Victorian qualifications internationally.

### Conclusion

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The Architects Registration Board of Victoria is a high-performing, self-funded regulator that protects consumers, maintains professional standards, supports Victoria's architectural education sector, and underpins the international competitiveness of Victorian architectural practice. It costs taxpayers nothing and delivers significant public benefit.

Its proposed absorption into the Business Licensing Authority is not a reform - it is an act of administrative convenience that trades long-term public interest for short-term bureaucratic tidiness. The consequences - for consumers, for practitioners, for students, and for Victoria's reputation as a centre of architectural excellence - will be real, lasting and difficult to reverse.

**Victoria should be building on the strengths of its architectural profession, not dismantling the regulatory architecture that makes those strengths possible.**

The profession, and the public it serves, calls on the Legislative Assembly to oppose this proposal and to commit to a regulatory model that is fit for purpose, profession-specific, and worthy of Victoria's standing as one of the world's great cities for architecture and design.