Australian Property Institute Ltd.
ABN 49 007 505 866
ACN 608 309 128

10 August 2026

Ms Ana Reilly
Senior Project Officer, Sustainable Homes
Consumer Energy Division
NSW Department of Climate Change, Energy, the Environment and Water

Lodged via the Buy NSW electronic tender box (RFI-2016157)

Response to Request for Information RFI-2016157: Solutions to stimulate demand for home energy ratings

Dear Ms Reilly,

Thank you for the opportunity to respond to RFI-2016157. The most direct way for NSW to build the existing-homes assessor workforce is to recognise and accredit qualified real estate valuers whose existing skillset closely aligns to what is required for energy rating assessments. Our responses to the RFI's questions are set out below.

About the API

The API is the peak body for property valuation professionals in Australia and sets the professional standards for valuation practice. We are a member of the REEDI Governance Forum, take part in the Industry Technical Working Group on energy disclosure, and delivered the education module for the NatHERS existing-homes trial.

Question 1. What model or solution could DCCEEW implement to subsidise ratings and to build consumer demand and awareness of ratings?

In the API's view, the best avenue to build consumer awareness and demand of energy efficiency ratings is at the time when a household is making a property decision, namely when offering a property for sale or rent.

- Link the rating assessment to the intention to offer the property for sale or rent, when property owners are looking to differentiate their properties and maximise the price.
- Deliver the rating assessment through a professional real estate valuer when conducting an inspection as part of a valuation process.
- Target any proposed subsidies to priority groups and locations, for example lower-income households, older housing stock, or areas where assessor capacity is being developed, so the same funding improves both demand and the workforce.

Take-up is expected to increase once efficiency ratings enable occupants to compare costs across different properties. Mandatory ratings required at the time of listing for sale or lease will be the fastest way to achieve this. Otherwise, if take-up relies on market forces, an efficiency rating may only become meaningful or relevant when there is an uplift in the value of a property.

1800 111 274
standards@api.org.au
Suite 1, Level 4/66 Clarence St,
Sydney NSW 2000

Question 2. What model or solution could DCCEEW implement to support people to become accredited assessors and expand the accredited assessor workforce?

The fastest model available to NSW is to accredit existing qualified valuers that are practicing across metropolitan, regional and rural NSW, who already inspect residential properties as part of their daily workflow. A small group of valuers were trained as assessors for the trial of early NatHERS existing-homes assessments. The valuation profession provides a large, distributed, quality-assured workforce that could be upskilled and mobilised quickly.

The current accreditation for an energy assessor requires a subset of the Certificate IV in Home Energy Efficiency and Sustainability (CPP41126) and NatHERS-specific unit and software training. The API's mapping of the accredited property degrees against the required competencies in the Certificate IV (CPP41126) shows valuers already hold most of the required competencies, the main exception being the assessment software. A streamlined pathway, recognising prior learning and a short bridging and software module developed by the API and delivered by a registered training organisation could accredit and expand the accredited assessor workforce quickly and at lower cost.

NSW can act on this now: design the accredited assessor program to draw on the existing valuer network, and support a streamlined recognition pathway with the NatHERS Administrator and through BuildSkills Australia's current review of the Certificate IV. As a further efficiency: valuers already inspect properties and a suitably accredited valuer would be able to complete an efficiency assessment at the same time. This has the potential to reduce costs to homeowners, reduce the environmental impact of travel and the inconvenience to households of arranging an alternative inspection.

Question 3. What roles can industry play in supporting and delivering these models? What would be required by industry (if any) to undertake these roles?

Valuers and valuation firms are well placed to integrate energy assessment ratings into their inspection process they already undertake to provide access to an established network of professionals across the state. To achieve this, the valuation industry requires a streamlined recognition pathway for real estate valuers, to meet competency requirements and access to accredited software training. The API is well placed to work with the energy efficiency assessors industry, contribute to the competency requirements and bridging training.

Question 4. What risks and issues are important for government to consider, and how can they be mitigated?

- Data integrity and usability. Mitigate by having minimum requirements for what data is necessary and how it is to be collected for an energy efficiency rating assessment.
- Workforce supply and quality. The voluntary trial resulted a limited take-up/demand by property owners, which has the potential to reduce the pool of active assessors. Mitigate by recognising existing qualified workforces and underpinning the role with a single competency standard and quality assurance.
- Consumer confidence. Inconsistent ratings undermine up-take. Mitigate by anchoring efficiency ratings to required competencies, professional standards and a robust complaints handling.

Question 5. Where are the opportunities for innovation and partnerships?

- A partnership between DCCEEW, the NatHERS Administrator, the API and a registered training organisation to provide a streamlined recognition pathway for qualified valuers.
- Co-delivery models that allow a suitably accredited professional to complete an energy efficiency assessment during an existing property inspection.
- Use of the API's national CPD and accreditation infrastructure to scale training and recognition into regional and rural NSW.

Conclusion

Recognising qualified valuers through a streamlined accreditation pathway is the most direct way to provide NSW the energy efficiency assessor capacity and coverage required, and the API is ready to work with DCCEEW and the NatHERS Administrator. The API's advocates for the up-skilling of the existing network of qualified valuers as energy efficiency assessors to efficiently implement the DCCEEW's framework to support a possible transition to mandatory home energy rating disclosure in NSW.

The API takes no position on whether or when NSW moves to mandatory disclosure.

We welcome the chance to discuss delivery in further detail. Any questions on this response can be directed to Harriet Warr, General Manager Policy and Standards, on 0474 772 291 or at hwarr@api.org.au.

Kind regards,

John Winter
Chief Executive Officer

Australian Property Institute Limited

Appendix: AUSTRALIAN PROPERTY INSTITUTE Valuer Competency & REEDI Assessment

AUSTRALIAN PROPERTY INSTITUTE

Valuer Competency & REEDI Assessment

A Critical Competency Analysis: CPP41119, the Full API-Accredited Qualifications Ecosystem, and the Real Skills Required for NatHERS/REEDI Existing Homes Assessments

Prepared by:
Office of the CEO, Australian Property Institute
Version 3.0 — March 2026

Strategic Overview — For Board and Ministerial Audiences

THE CORE PROPOSITION	Qualified API members — Certified Practising Valuers (CPVs), CPV Residential holders, and Residential Property Valuers (RPVs) — already hold all the substantive competencies required to conduct NatHERS/REEDI existing homes energy assessments. The single genuinely new skill is operating AccuRate Enterprise software. That is a 1–2 day training matter, not a qualification gap. The CPP41119 Certificate IV requirement is a credentialing barrier, not a competency barrier.

The following five points summarise the full technical case set out in Parts 1–10 of this paper. Supporting evidence and detailed analysis are available in the relevant parts.

The Problem	The Evidence
CPP41119 was designed for new homes plan-based modelling, not existing homes physical inspection. It is the wrong qualification for the task.	The qualification description, unit structure and NatHERS Technical Note confirm: new homes assessment is predictive/software-driven; existing homes assessment is empirical/inspection-driven. These are different tasks requiring different skills.
The CPP41119 gatekeeping requirement applies to all API members, including holders of AQF Level 9 Masters degrees — who are four qualification levels above the gate.	API accredits 14+ university programs from undergraduate to Masters level for CPV/RPV eligibility. Requiring a Masters or Bachelors graduate to obtain a Certificate IV to perform a subset of their professional duties is educationally indefensible.
19 of the 20 discrete steps in an existing homes NatHERS assessment are already within a qualified valuer's competency. The API Rules of Professional Conduct mandate physical property inspection as a prerequisite for a valid valuation.	Step-by-step operational analysis (Part 5) and unit-by-unit CPP41119 mapping (Part 4) together establish that the only new competency is AccuRate Enterprise software — a bounded, learnable skill addressable by short training.
The government's own NatHERS trial has already assigned valuers to the in-home data collection role — the task that constitutes 19 of 20 assessment steps.	The 'Scale Stream' of the NatHERS Existing Homes Trial explicitly partners banks with property valuers to collect all in-home data. This is government-recognised de facto validation of valuer inspection competency for this role.
Australia's NatHERS existing homes assessor supply is critically low and the CPP41119 pathway cannot scale fast enough for mandatory disclosure. API's ~8,500 professional members, geographically distributed, are ready to be mobilised.	NatHERS own website states assessor availability is 'currently very low.' Stage 2 from mid-2026 requires a workforce the CPP41119 pipeline alone cannot supply in time. An API valuer pathway is the most direct, quality-assured solution.

Competency At-a-Glance: REEDI Assessment vs Valuer Practice

The table below distils the detailed analysis in Parts 4 and 5 into a board-level summary. It corrects a common misreading: the finding is not that some gaps remain — it is that every competency required for an existing homes assessment is already held by qualified valuers, except one software training requirement.

REEDI Assessment Requirement	Valuer Qualification / Practice Basis	Status	Implication
Building fabric identification (walls, floors, ceilings, glazing, insulation)	PVVAL106A Residential Construction; PVVAL207A Commercial Construction; mandatory CPV inspection practice	**HELD**	RPL granted
Systematic spatial mapping and zone measurement	PVVAL107A Residential Valuation; every residential valuation report produced by CPV/RPV	**HELD**	RPL granted
Site safety and risk management	PVVAL304A Risk and Ethical Valuation; API PropSec PI insurance requirements; standard WHS practice	**HELD**	RPL granted
Client engagement, consent and privacy compliance	All CPV/RPV professional practice — API Code of Ethics; API Rules of Professional Conduct	**HELD**	RPL granted
Thermal performance advisory to clients	Core CPV function: providing professional advisory opinions on physical property characteristics	**HELD**	RPL granted
Orientation, shading and solar access assessment	Standard residential valuation descriptor — solar orientation is a recognised value factor for CPVs	**HELD**	RPL granted
Heating, cooling and hot water system identification	Standard valuation inspection descriptor — services type, age and condition recorded in every report	**HELD**	RPL granted
Professional documentation and evidence photography	Mandatory API professional practice requirement — photographic records required for all valuations	**HELD**	RPL granted
AccuRate Enterprise software operation	No equivalent — this is new, specific, and bounded	**GAP**	1–2 day training module

KEY: HELD = competency already established through professional qualification and practice, RPL appropriate. GAP = genuine new competency requiring structured training.

CRITICAL CLARIFICATION — READING THE TABLE CORRECTLY

The conclusion of this analysis is affirmative: all gaps can be addressed. There are no competency deficiencies in the API membership that require a new qualification. The sole gap item — AccuRate Enterprise software — requires training, not a Certificate IV. A misreading that treats this as evidence that RPL 'won't work' inverts the argument. Every row except the last confirms RPL is appropriate. The last row confirms a 1–2 day training module is sufficient.

Recommended Actions — Summary

#	Action	Target / Owner
1	Establish a formal RPL pathway: negotiate with ASQA and the Future Skills Organisation to grant full credit for API-accredited degrees and CPV/RPV experience (see Appendix A for draft evidence framework)	ASQA + FSO — API CEO to initiate
2	Develop a 1–2 day AccuRate Enterprise bridging module as a CPD-classified training activity, not a qualification requirement, with a NatHERS-approved RTO partner	NatHERS Administrator + RTO partner — API CEO to commission
3	Submit a formal 'Property Valuer Pathway' proposal to the NatHERS National Administrator's consultation on additional accreditation pathways ahead of Stage 2 (mid-2026)	DCCEEW / NatHERS Administrator — urgent; Stage 2 design window is open now
4	Incorporate the CPP41119 gatekeeping argument into REEDI Governance Forum and ministerial submissions, framing it as a supply constraint on the government's own net zero and housing disclosure objectives	All relevant advocacy contacts — NSW, Victoria, federal
5	Commission a member skill survey mapping CPV/RPV competencies against the NatHERS data collection protocol to produce quantitative evidence for the RPL case	API Policy & Research — within 60 days

Full analysis supporting each recommendation follows in Parts 1–10. Appendix A contains the draft RPL evidence framework for immediate use in negotiations with ASQA and the NatHERS Administrator.

Executive Summary

This paper sets out a detailed, evidence-based case across ten parts that qualified API members — Certified Practising Valuers (CPVs) and Associate Members holding qualifications in property valuation — already possess the substantive competencies required to conduct residential energy efficiency assessments under the REEDI framework and the NatHERS for Existing Homes scheme.

The Certificate IV in Home Energy Efficiency and Sustainability (CPP41119) is currently held out as the prerequisite qualification for NatHERS/REEDI assessors. This paper demonstrates that CPP41119 was designed for a fundamentally different task — the thermal performance modelling of new homes from building plans — and that its application as a gatekeeping requirement for existing homes inspection work is structurally inappropriate. Up to six of its fifteen units are generic business administration content that add no assessor competency. The qualification was not built with existing homes inspection in mind, and it was not built with a view to the existing skills of Australia's professional property valuers.

API accredits more than a dozen university programs — from bachelor's to master's degrees — spanning all major Australian states and territory markets, all of which confer CPV or RPV eligibility. Every program in this ecosystem addresses building construction, physical inspection methodology, client advisory, professional ethics and risk management to a standard that meets or exceeds the relevant CPP41119 units. The AQF inversion is most acute at the postgraduate level: a UTS Master of Property Development graduate — four AQF levels above CPP41119 — is currently required to obtain a Certificate IV to conduct an inspection-based task that falls squarely within their professional competency.

A step-by-step analysis of all 20 discrete tasks in a NatHERS existing homes assessment confirms that 19 are fully within valuer competency. The one genuinely new element — AccuRate Enterprise software — is a bounded, learnable skill addressable through a structured 1–2 day training module. This is not a qualification gap; it is a software familiarisation gap.

GOVERNMENT VALIDATION	The NatHERS Existing Homes Trial (2024–2025) includes a Scale Stream in which property valuers are explicitly partnered with banks to collect all in-home assessment data. The government has already assigned valuers to the inspection role that constitutes 19 of the 20 assessment steps. This is de facto recognition that property valuers hold the relevant competencies. The logical completion of this recognition is a formal accreditation pathway — not the perpetuation of a two-professional model that fragments what should be a unified service.

Australia's NatHERS existing homes assessor supply is acknowledged by the NatHERS Administrator to be 'currently very low.' The Residential Efficiency Scorecard — with only 150 assessors nationally at peak — is closing in June 2026. The CPP41119 training pipeline cannot produce adequate assessor numbers before mandatory disclosure policy takes effect. API's approximately 8,500 professional members represent a pre-existing, geographically distributed, quality-assured inspection infrastructure that could be mobilised immediately if the software training gap is addressed. Excluding them through a credentialing barrier that does not reflect genuine competency differences is a policy failure that serves no one.

Part 1: CPP41119 — Deconstructing the National Skills Package

1.1 What CPP41119 Is — and What It Was Built For

CPP41119 Certificate IV in Home Energy Efficiency and Sustainability was released with CPP Property Services Training Package Release 9.0. It supersedes CPP41110 (Certificate IV in Home Sustainability Assessment) and CPP41212 (Certificate IV in NatHERS Assessment), combining them into a single qualification.

The qualification description is explicit: it covers thermal performance assessors who 'use government approved software and information obtained from residential building plans and drawings to model potential consumption of energy for heating and cooling purposes and assess and certify the thermal performance of homes based on a ten-star rating system.' This is a software modelling role working from plans — not a physical inspection role.

CRITICAL OBSERVATION

The original design of CPP41119 is for plan-based energy modelling of new homes for building approval compliance. It was not designed with existing homes inspection in mind. The NatHERS for Existing Homes scheme is an entirely different service model — it requires physical site inspection, not plan analysis — yet CPP41119 has been carried forward as the default qualification requirement for this new context without sufficient critical analysis.

1.2 The 15-Unit Structure: Core, Specialist and Filler

CPP41119 requires 15 units: 4 core and 11 electives drawn from Group A (thermal performance), Group B (home sustainability) and Group C (general business/administration). The following analysis categorises each unit by its genuine relevance to existing homes assessment work.

Core Units (4 units — mandatory for all candidates)

Unit Code & Title	Genuine Relevance to Existing Homes	Valuer Equivalence
BSBRSK401 — Identify risk and apply risk management processes	Moderate — professional risk management underpins all advisory work	PVVAL304A Risk and Ethical Valuation + 20+ years of API professional standards requirements for CPVs
CPPCOM4001 — Manage own work, professional development and ethical behaviour	Low — generic professional conduct unit applicable to any profession	All API members bound by mandatory CPD (30 hours/year), the API Code of Ethics, and CPV conduct requirements — a stricter regime than CPP41119
CPPHES4001 — Research and assess impact of building elements on thermal performance of residential buildings	High — understanding building fabric and its thermal implications is directly relevant	PVVAL106A Residential Construction + PVVAL207A Commercial Construction + daily inspection practice assessing building quality, age, materials and condition
CPPHES4002 — Advise clients on thermal performance of residential buildings	High — communication of findings to clients	Core valuer competency. All CPVs are trained and practised in providing professional advisory opinions to clients, including on building characteristics that affect value

Group A Electives: Thermal Performance Assessment (Key Specialist Stream)

Unit Code & Title	Genuine Relevance to Existing Homes	Valuer Equivalence
CPPCMN4008 — Read plans, drawings and specifications for residential buildings	High for new homes (plan-based). Lower for existing homes where physical inspection supersedes plans	PVVAL102A Property Valuation Technologies + PVVAL106A Residential Construction. Valuers routinely read and interpret as-built plans as part of standard inspection methodology
CPPHES4003 — Operate and maintain computer system to support thermal performance assessments	High — software operation is central to producing a NatHERS certificate	PVVAL102A Property Valuation Technologies covers property technology competence broadly. The specific AccuRate Enterprise software is new, but this is a training matter, not a qualification gap. Valuers regularly adopt new technology platforms as part of practice
CPPHES4004 — Conduct thermal performance assessment of residential buildings	This unit is designed for new homes plan modelling. For existing homes, the equivalent is data collection + software entry. The data collection component maps entirely to valuer inspection practice	PVVAL107A Residential Valuation covers systematic residential property inspection. The data points collected in NatHERS existing homes assessment — zone mapping, wall/floor/ceiling types, window specifications, insulation, shading, orientation — are a subset of a standard valuation inspection
CPPHES5001 — Conduct thermal performance assessment of complex residential buildings	Applies to complex new homes designs. Less relevant to standard existing homes assessments	PVVAL205A Commercial Valuation and PVVAL207A Commercial Construction cover complex building assessment for valuation purposes at a higher technical standard

Group B Electives: Home Sustainability Assessment

Unit Code & Title	Genuine Relevance to Existing Homes	Valuer Equivalence
CPPCOM4002 — Implement safe work practices in the property industry	Moderate — safe work practices for property inspections	API members conduct property inspections as core business. Standard WHS obligations and professional indemnity insurance requirements (including those administered through API PropSec) already govern safe inspection practice
CPPHES4005 — Assess household energy use and efficiency improvements	Very High — directly relevant to the REEDI disclosure framework	Partial match: valuers assess building quality and condition but do not currently systematically document energy appliance specifics. However, these items (hot water system type/age, heating/cooling type, lighting) are already observed during a standard valuation inspection and recorded in varying degrees
CPPHES4006 — Assess household water use and efficiency improvements	Low to Moderate — water efficiency is a secondary element of REEDI assessments	Valuers observe water infrastructure (mains vs rainwater, pool, irrigation). Water efficiency appliance specifications (shower heads, tap ratings) are beyond standard practice but are low-skill observations
CPPHES4007 — Assess thermal performance of existing residential buildings	HIGHLY RELEVANT — this is the closest CPP41119 unit to what REEDI actually requires	PVVAL106A Residential Construction covers the building fabric knowledge base underpinning thermal performance assessment of existing buildings. The overlay of NatHERS software to quantify what a valuer already qualitatively assesses is the genuine and narrow gap

Group C Electives: The Filler Layer

Group C contains 11 elective units drawn from generic business administration and governance training packages. A frank assessment of these units in the context of a physical property inspection role reveals that they serve institutional completeness rather than any genuine assessor competency need:

- BSBAUD411/511/512/513 series — Quality audit units drawn from the BSB (Business Services) training package. These are process governance units for internal quality systems. They have no direct application to the physical conduct of an energy assessment and would be equally relevant (or irrelevant) to any professional in any sector. API members operate under governance frameworks — the IVSC International Valuation Standards, the API Standards and Guidance Notes, and API's own Quality Assurance program — that represent a higher standard of professional oversight than this unit contemplates.
- BSBESB305/402/406 series — Business venture compliance and entrepreneurship units. These are entirely extraneous to assessment competency. Their presence in the qualification reflects the CPP training package's interest in producing practitioners capable of running small assessment businesses — not in producing technically competent assessors.

- BSBWRT411 — Write complex documents. That a graduate professional property valuer, who routinely produces court-admissible expert reports, would need certification in 'writing complex documents' speaks to the gap in rigour between CPP41119 and the valuation qualification.
- BSBSUS406/411 — Sustainability rating tools and sustainable work practices. These are generic sustainability awareness units with no specific technical content. They serve to add thematic coherence to the qualification rather than genuine competency.

CRITICAL FINDING

At minimum 6 of the 15 CPP41119 units (Group C electives) have no meaningful bearing on the capacity to conduct an existing homes energy assessment. Their presence inflates the apparent qualification burden without adding genuine assessor competency. This is a structural feature of the VET training package architecture, but it has real exclusionary consequences when applied as a blanket requirement for entry into the REEDI assessor role.

Part 2: The Full Landscape of API-Accredited Qualifications

It is important to establish from the outset that the TAFE NSW Bachelor of Property Valuation, while the most analytically tractable comparator given its subject-level transparency, is not the only pathway through which API members acquire their CPV or RPV certification. API accredits a broad ecosystem of university programs across Australia — ranging from three-year undergraduate bachelor degrees to postgraduate masters programs — all of which confer eligibility for CPV and RPV certification. This distinction is critical to the advocacy argument: the CPP41119 gatekeeping requirement applies not just to TAFE NSW graduates, but to the entire API membership, including holders of AQF Level 9 master's degrees from research-intensive universities.

2.1 The API Accreditation Ecosystem — CPV and RPV Pathways

The following table catalogues the currently active API-accredited programs that confer CPV and/or RPV eligibility, organised by institution, program level, and AQF level. Programs marked as 'teach-out' are noted for completeness.

Institution	Program	AQF Level	CPV/RPV Eligibility
UNDERGRADUATE PROGRAMS — AQF LEVEL 7			
TAFE NSW	Bachelor of Property Valuation (HE20507V02) — VET Sector, only specialist valuation degree in Australia	7	CPV and RPV
Deakin University	Bachelor of Property and Real Estate — includes Sustainable Construction, Statutory Valuation, Property Economics, WIL placement	7	CPV and RPV
Deakin University	Bachelor of Property and Real Estate / Bachelor of Commerce (double degree)	7	CPV and RPV
Deakin University	Bachelor of Property and Real Estate / Bachelor of Laws (double degree)	7	CPV and RPV
Deakin University	Bachelor of Construction Management (Hons) / Bachelor of Property and Real Estate — deepest construction knowledge of any API-accredited program	7/8	CPV and RPV
Curtin University	BCom (Property Development and Valuation Extension Major) — includes construction, architecture, economics, finance, law, 3-week work placement; also RICS accredited	7	CPV and RPV
UTS	Bachelor of Property Economics — property valuation, economics, finance, statutory valuation, built environment	7	CPV and RPV (conditional)
RMIT University	Bachelor of Applied Science (Property and Valuation) / related	7	CPV and RPV

Institution	Program	AQF Level	CPV/RPV Eligibility
	programs — includes building technology, construction, economics		
Western Sydney University	Bachelor of Business (Property) — land economics tradition; includes construction, valuation, economics	7	CPV and RPV
University of South Australia	Bachelor of Applied Science (Property) / related programs — includes residential and commercial valuation, construction	7	CPV and RPV
Bond University	Bachelor of Property — property valuation, economics, construction, law; small cohort, strong industry links	7	CPV and RPV
POSTGRADUATE PROGRAMS — AQF LEVEL 8-9			
UTS	Master of Property Development (on-campus) — CPV conditional on completing Land Acquisition/Statutory Valuation + Investment Property Valuation subjects	9	CPV and RPV (conditional)
UTS	Master of Property Development (online) — same CPV conditions apply	9	CPV and RPV (conditional)
Deakin University	Graduate Diploma of Property — CPV conditional on prior study in accounting/finance, business law, and property economics	8	CPV and RPV (conditional)

2.2 What All API-Accredited Programs Have in Common

Despite their differences in institution, level, format and duration, all API-accredited programs that confer CPV or RPV eligibility share a core set of competency domains that API mandates through its accreditation standards. These are the domains that matter for the REEDI competency argument, and they are present — at greater or lesser depth — across every program in the landscape above.

Competency Domain	Presence Across API-Accredited Programs
Building construction and materials	Universal — all CPV-stream programs require study of building fabric, construction methodology, materials, and building elements. This ranges from dedicated subjects (Residential Construction, Commercial Construction in TAFE NSW; Building Technology at Curtin; Sustainable Construction at Deakin) to embedded content within valuation methodology subjects. This is the most directly relevant competency domain for REEDI data collection.
Physical property inspection methodology	Universal — systematic site inspection is the core practical skill of property valuation at all levels. All programs teach and assess systematic observation, measurement, evidence collection, and documentation of building characteristics. Every CPV must demonstrate inspection competency through practical valuation reports assessed by the API.
Property law and statutory compliance	Universal — all programs include substantial property law content covering real property rights, contracts, statutory processes, and compliance obligations.

Competency Domain	Presence Across API-Accredited Programs
	Professional privacy and consent obligations, relevant to REEDI assessments, are directly addressed.
Client advisory and professional communication	Universal — all programs require graduates to develop professional advisory and report-writing skills. Communicating technical findings to non-specialist clients is assessed through coursework and practical reports across all programs.
Risk management and professional ethics	Universal — API's accreditation standards require all programs to address professional risk, ethics, and conduct. All CPV holders are additionally subject to API's binding Code of Ethics and continuing professional development obligations.
Property economics and market analysis	Universal — all programs develop understanding of market dynamics, economic drivers of property value, and investment analysis. This contextual understanding is relevant to the advisory component of REEDI assessments.
Technology and data systems	Universal at undergraduate level; deepened at postgraduate level — all programs address property technology and data systems. Technology adoption is a professional expectation for all CPVs. The specific AccuRate Enterprise software is new across all programs, but the underlying technology competency is present.
Sustainability and built environment performance	Variable but increasing — dedicated sustainability or sustainable construction subjects appear in several programs (Deakin, Curtin, RMIT). All programs increasingly address sustainability as a value driver and market characteristic. Deakin's Bachelor of Property and Real Estate explicitly includes 'sustainable construction' as a curriculum area.

2.3 The AQF Level Argument Across the Full Cohort

The AQF dimension of the CPP41119 gatekeeping argument becomes considerably more acute when the full scope of API's accredited qualifications is considered. The argument is not simply that an AQF Level 7 TAFE NSW graduate should not be required to obtain an AQF Level 5 qualification for a task within their competency scope. It extends across the entire cohort:

Qualification Pathway	AQF Level	CPP41119 Requirement
CPP41119 Certificate IV in Home Energy Efficiency and Sustainability (the 'gate')	5	**Baseline — the requirement itself**
TAFE NSW Bachelor of Property Valuation	7	**Two levels above CPP41119 — required to also hold a Level 5 certificate**
Deakin / Curtin / UTS / RMIT / WSU / UniSA / Bond undergraduate property degrees	7	**Two levels above CPP41119 — required to also hold a Level 5 certificate**
Deakin Graduate Diploma of Property	8	**Three levels above CPP41119 — required to also hold a Level 5 certificate**
UTS Master of Property Development (on-campus or online)	9	**Four levels above CPP41119 — required to also hold a Level 5 certificate**

THE AQF ABSURDITY

A holder of a UTS Master of Property Development — an AQF Level 9 qualification explicitly accredited by API for CPV certification, requiring prior undergraduate study in a related field — is currently required to obtain a

Certificate IV (AQF Level 5) to conduct an existing homes energy assessment, despite the master's program providing demonstrably superior coverage of every substantive competency that CPP41119 addresses. This is not a defensible position under any skills recognition framework.

2.4 The Postgraduate Pathway — A Special Case

The postgraduate CPV pathway deserves particular attention because it reveals the most pronounced version of the AQF inversion problem. Both the UTS Master of Property Development and the Deakin Graduate Diploma of Property are accredited for CPV eligibility with specific conditions — requiring subjects in statutory valuation, land acquisition, and investment property valuation to be completed.

These conditions exist precisely because API recognises that graduate-entry students may not have completed undergraduate-level building fabric and construction content. The solution API's accreditation framework applies is targeted subject completion — not an entirely separate qualification from a different sector. This is the RPL model API itself applies within its own accreditation framework, and it provides the direct precedent for how the REEDI/NatHERS competency gap should be addressed: targeted bridging, not whole-of-qualification replacement.

INTERNAL PRECEDENT

API already applies a conditional accreditation model — requiring specific subject completion rather than an entirely new qualification — for postgraduate CPV pathways. The same logic applies here. A valuer who holds a CPV-accredited qualification but has not yet trained on AccuRate Enterprise should be required to complete specific software training, not CPP41119 in its entirety.

2.5 What Deakin's Double Degree Cohort Tells Us

One API-accredited program warrants specific emphasis in the REEDI competency context: the Deakin Bachelor of Construction Management (Honours) / Bachelor of Property and Real Estate. This double degree produces graduates who hold both CPV accreditation through API and comprehensive construction management accreditation through the Australian Institute of Building (AIB), the Australian Institute of Quantity Surveyors (AIQS), the Chartered Institute of Building (CIOB), and the Royal Institution of Chartered Surveyors (RICS).

Graduates of this program have studied building technology, construction methodology, site management, building materials, structural systems, services infrastructure, and sustainable construction to an honours level — in addition to their full property valuation curriculum. The proposition that such a graduate, who has more construction knowledge than the average NatHERS new homes assessor, requires a Certificate IV in Home Energy Efficiency and Sustainability before they can conduct an existing homes energy inspection, is not merely inconsistent — it is indefensible.

Part 3: The TAFE NSW Bachelor of Property Valuation — Detailed Competency Audit

3.1 The Degree at a Glance

The TAFE NSW Bachelor of Property Valuation (HE20507V02) is the only VET-sector specialist valuation degree in Australia, and it is the most analytically transparent of all API-accredited programs given the granularity of its published subject catalogue. It provides the most direct unit-by-unit comparator with CPP41119 and is therefore used as the primary reference point in the detailed competency mapping that follows. The conclusions drawn are, however, applicable — and often reinforced — by reference to the university programs catalogued in Part 2.

The degree comprises 24 subjects (240 credit points): 21 core subjects and 3 electives. The following table maps the full curriculum across its three years, identifying the primary competency domains addressed by each subject.

Code	Subject	Core Competency Domain(s)
YEAR 1		
PVVAL101A	Foundation Valuation Concepts	Valuation theory, methodology, market analysis, report writing, professional standards
PVVAL102A	Property Valuation Technologies	Property data systems, spatial technology, GIS, digital tools, plans and drawings interpretation
PVVAL103A	Planning and Spatial Analysis	Land use planning, zoning, development controls, spatial analysis, planning law
PVVAL104A	Property Law	Land law, real property, title systems, easements, statutory rights, contracts of sale
PVVAL105A	Introduction to Financial Theory	Time value of money, capitalisation rates, investment fundamentals, financial mathematics
PVVAL106A	Residential Construction	Building materials, construction methodology, building defects, building elements, structural systems, services — directly addresses building fabric knowledge required for energy assessment
PVVAL107A	Residential Valuation	Full property inspection methodology, comparable sales analysis, residential market valuation — core inspection protocol
PVVAL108A	Property Economics	Supply and demand, market cycles, macroeconomics, property market analysis
YEAR 2		
PVVAL201A	Property Law II	Advanced property law, mortgages, leasehold, strata, compulsory acquisition, compensation
PVVAL202A	Applied Financial Theory	Investment analysis, DCF modelling, financial modelling for property
PVVAL203A	Industrial and Insurance Valuation	Industrial property assessment, insurance valuation, replacement cost methodology — building fabric knowledge

Code	Subject	Core Competency Domain(s)
PVVAL204A	Property Accounting and Taxation	Accounting principles, GST, CGT, depreciation schedules
PVVAL205A	Commercial Valuation	Commercial property inspection and valuation, income and sales comparison approaches
PVVAL206A	Rural Valuation	Rural property assessment, land improvements, agri-infrastructure
PVVAL207A	Commercial Construction	Commercial building systems, materials, construction types, building services — extends residential construction knowledge to commercial scale
PVVAL208A	Property Investment and Feasibility	Investment analysis, development feasibility, holding cost calculations
YEAR 3		
PVVAL301A	Retail Valuation	Retail property, lease analysis, turnover rents, retail market dynamics
PVVAL302A	Specialised and Government Valuation	Specialised assets, heritage, contamination, government valuation requirements
PVVAL303A	Statutory Valuation	Land valuation legislation, objection processes, statutory compliance
PVVAL304A	Risk and Ethical Valuation	Professional risk management, ethics, conflicts of interest, professional indemnity, API standards compliance
PVVAL305A	Property Research Project	Independent research design, evidence analysis, professional report production
PVVAL306A	Property Finance and Development	Development finance, feasibility modelling, construction risk
PVVAL307A	Agribusiness Valuation	Agricultural assets, rural land improvements, water entitlements
PVVAL308A	Going Concern Valuation	Business-integrated property, goodwill separation, operational asset assessment

Part 4: Competency Mapping — CPP41119 Against the Valuation Degree

The following table maps each CPP41119 unit (core and specialist electives) against the TAFE NSW Bachelor of Property Valuation curriculum and/or the professional practice requirements governing API members. The assessment of 'Match Level' uses four categories:

- Full Match — The competency is comprehensively covered by the valuation degree or professional requirements
- Strong Match — The competency is substantially covered; minor contextual differences exist
- Partial Match — A meaningful portion of the competency is covered; a focused bridging component would address the remainder
- Requires Training Only — The competency is genuinely new but is narrow in scope and addressable through short-form vocational training (not a qualification gap)

CPP41119 Unit	TAFE NSW Subject(s)	Match Level	Basis for Match
BSBRSK401 — Risk management processes	PVVAL304A Risk and Ethical Valuation	**Full Match**	Risk assessment is embedded throughout the valuation degree and is a daily practice requirement for CPVs under API standards
CPPCOM4001 — Professional conduct and CPD	API Code of Ethics, CPV Certification, API CPD Scheme (30 hrs/year)	**Full Match**	API's professional conduct and CPD obligations are more rigorous and formal than this VET unit. CPVs are already subject to a binding ethical and CPD framework
CPPHES4001 — Building elements and thermal performance	PVVAL106A Residential Construction; PVVAL207A Commercial Construction; daily inspection practice	**Strong Match**	Valuers comprehensively understand building fabric — wall types, roof construction, floor systems, materials, age and condition. The specific quantification of thermal performance is the incremental component
CPPHES4002 — Client advisory on thermal performance	All valuation subjects incorporate client communication; PVVAL304A Ethics	**Full Match**	Professional client advisory is the fundamental function of a valuer. Communicating technical findings in accessible terms is a core CPV competency
CPPCMN4008 — Read plans, drawings and specifications	PVVAL102A Valuation Technologies; PVVAL106A Residential Construction; PVVAL207A Commercial Construction	**Full Match**	Plan reading is a foundation skill of the valuation degree and is routinely exercised in practice. Valuers interpret as-built documentation as part of standard due diligence
CPPHES4003 — Computer systems for	PVVAL102A Valuation Technologies; general	**Requires Training Only**	Valuers are proficient technology users who routinely adopt new

CPP41119 Unit	TAFE NSW Subject(s)	Match Level	Basis for Match
thermal performance assessments	professional technology competence		platforms. AccuRate Enterprise is specific software that requires formal training, but this is a narrow, bounded competency gap — not a qualification deficiency
CPPHES4004 — Conduct thermal performance assessment (residential)	PVVAL107A Residential Valuation; PVVAL106A Residential Construction; physical inspection practice	**Partial Match**	The data collection elements of this unit — site measurement, building fabric identification, appliance documentation — map directly to valuation inspection practice. The software modelling step requires specific training in AccuRate Enterprise
CPPHES5001 — Complex residential thermal assessment	PVVAL205A Commercial Valuation; PVVAL207A Commercial Construction	**Partial Match**	Valuers regularly inspect and assess complex residential and mixed-use buildings. The complexity management skills exist; the specific application to thermal modelling of complex building forms requires targeted training
CPPCOM4002 — Safe work practices (property industry)	API PropSec professional indemnity requirements; standard professional inspection WHS obligations	**Full Match**	Property valuers conduct on-site inspections as core business under professional indemnity insurance and WHS frameworks. API PropSec and standard industry practice provide equivalent or superior safety governance
CPPHES4005 — Household energy use and efficiency improvements	PVVAL106A Residential Construction; inspection practice (appliance and services observation)	**Partial Match**	Valuers observe and record heating/cooling, hot water, and energy generation systems during inspections. Systematic classification to NatHERS data specifications requires incremental structured training, not a qualification-level gap
CPPHES4006 — Water use and efficiency improvements	General site inspection practice	**Partial Match**	Water infrastructure is observed during inspections. Detailed water efficiency classification is beyond current practice scope but represents a narrow, low-technical observation task
CPPHES4007 — Assess thermal performance of existing residential buildings	PVVAL106A Residential Construction; PVVAL107A Residential Valuation; PVVAL207A Commercial Construction	**Strong Match**	This is the most directly relevant CPP41119 unit to the REEDI task. Valuers already systematically assess all the physical attributes of existing buildings that determine thermal performance — insulation, wall construction, glazing, orientation, shading. The NatHERS overlay formalises what valuers already qualitatively assess

MAPPING SUMMARY	Of 12 core and specialist elective units analysed: 5 are Full Matches, 3 are Strong Matches, 3 are Partial Matches with narrow bridging requirements, and 1 (software operation) Requires Training Only. Zero units represent a fundamental qualification gap that could not be addressed through an RPL pathway combined with structured software training.

Part 5: The Deep Dive — What a REEDI/NatHERS Existing Homes Assessment Actually Requires

4.1 The Assessment in Practice

The NatHERS for Existing Homes assessment method is governed by the NatHERS Technical Note (current version January 2026) and supported by the Guidance Note. The method involves a physical site inspection and data collection visit, followed by data entry into AccuRate Enterprise software to generate a Home Energy Rating Certificate providing:

- A NatHERS thermal performance Star Rating out of 10 (based on heating and cooling energy demand)
- A Whole of Home 'Home Energy Rating' out of 100 (incorporating fixed appliances, hot water, PV/battery)
- Upgrade recommendations for the homeowner

The following table maps each step of the assessment process against the nature of the competency it requires and the extent to which an experienced property valuer already holds that competency. This is the core of API's argument.

REEDI/NatHERS Assessment Step	Nature of Competency Required	Existing Valuer Competency
Pre-assessment: Client engagement, consent, privacy compliance, scheduling	Professional client communication; privacy law compliance; appointment management	**ALREADY HELD — Client engagement is the primary interpersonal competency of all CPVs. Privacy Act compliance is a standard professional obligation. Scheduling and managing property access is daily valuer practice**
Site safety check and equipment preparation (LiDAR device, tablet)	Basic WHS self-assessment; technology operation	**ALREADY HELD — Valuers conduct site safety assessments before every inspection. LiDAR technology is increasingly used in advanced valuation practice; tablet-based data collection is standard**
Climate zone determination from postcode	Geographic classification using NatHERS postcode database	**ALREADY HELD — Valuers are professionally required to understand the geographic context and location characteristics of the properties they assess. This is a simple lookup function**
Dwelling zone identification and mapping (rooms, zones, enclosed areas)	Systematic spatial mapping of all dwelling areas; understanding zone definitions	**ALREADY HELD — Measuring and mapping all rooms and areas is the foundational physical task of every residential valuation inspection. Zone identification for NatHERS**

REEDI/NatHERS Assessment Step	Nature of Competency Required	Existing Valuer Competency
		purposes uses the same spatial logic
Floor construction identification (slab, timber subfloor, type, insulation)	Visual identification of floor construction type from physical inspection	**ALREADY HELD — PVVAL106A Residential Construction and practical experience equip valuers to identify and classify floor construction systems. This is standard due diligence in a mortgage security valuation**
Wall construction and materials identification (brick veneer, double brick, weatherboard, timber frame, etc.)	Visual identification and classification of wall construction to NatHERS specifications	**ALREADY HELD — Wall construction type is a primary valuation input affecting replacement cost, quality grading, building age analysis and market appeal. Valuers classify wall construction on every residential inspection**
Ceiling and roof construction identification	Visual inspection of ceiling/roof assembly; insulation presence assessment	**ALREADY HELD — Ceiling and roof condition, construction type, and insulation presence are standard valuation inspection items affecting both value and insurability**
Insulation identification (ceiling, wall, underfloor) — visual evidence or default values	Visual inspection where accessible; application of NatHERS default values where inaccessible	**ALREADY HELD — Valuers already observe and note insulation where visible. The NatHERS protocol's provision for default values when insulation is not visible is a practical concession that mirrors how valuers handle inaccessible building elements in valuations**
Window assessment (single/double glazing, frame type, dimensions, area)	Measurement and visual classification of window specifications to NatHERS data requirements	**ALREADY HELD — Window type, condition, glazing and size are standard valuation descriptors. Valuers already measure floor areas and describe fenestration in valuation reports**
Orientation mapping (floor plans, compass orientation)	Spatial orientation of dwelling zones relative to compass bearings	**ALREADY HELD — Solar orientation is a recognised value-influencing factor in residential valuation, particularly for apartment and lifestyle properties. Valuers assess and record orientation as standard practice**
Shading assessment (eaves, external shading structures, neighbouring structures)	Observation and recording of external shading elements affecting thermal performance	**ALREADY HELD — Valuers assess solar access, overshadowing, and privacy impacts as part of any residential inspection. NatHERS shading inputs are a formalised**

REEDI/NatHERS Assessment Step	Nature of Competency Required	Existing Valuer Competency
		version of what valuers already qualitatively assess
Air infiltration/sealing assessment (draughtproofing, seals, openings)	Observation of dwelling envelope sealing characteristics	**ALREADY HELD — Valuers note building envelope condition including weatherproofing and sealing. This is a component of building condition assessment**
Heating and cooling system identification (type, age, fuel, rating)	Identification and classification of HVAC systems to NatHERS appliance data specifications	**ALREADY HELD — Heating and cooling systems are standard valuation descriptors. Type, age, and condition of mechanical services are recorded in every residential valuation report. NatHERS data requirements are more specific (star rating/AEER) but the underlying observation is identical**
Hot water system identification (type, age, fuel, efficiency)	Classification of hot water systems to NatHERS specifications	**ALREADY HELD — Hot water system type, age and fuel source are standard valuation observations. The efficiency rating requirement (star rating or default) adds specificity but not a new skill domain**
Lighting assessment (LED vs non-LED, proportion)	Simple visual classification of lighting types	**ALREADY HELD — Valuers observe lighting quality and type as a component of fit-out and condition assessment. LED classification is a simple binary observation**
Solar PV and battery identification (presence, capacity, configuration)	Identification of on-site energy generation assets	**ALREADY HELD — Solar PV systems are capital improvements that affect rental income, depreciation schedules, and in some cases valuation. Valuers already identify and note PV systems. Panel count and approximate capacity are observable**
Evidence photography (photographic documentation of all data inputs)	Systematic evidence capture following NatHERS evidence collection guidelines	**ALREADY HELD — Photographic documentation of all material features is a standard valuation practice requirement. Valuers routinely produce photographic records as part of audit trails and report support**
Data entry into AccuRate Enterprise software (zone modelling, inputting all data fields, generating rating)	Software operation: translating physical observations into the AccuRate Enterprise data model	**TRAINING ONLY — This is the sole genuinely new competency. AccuRate Enterprise is NatHERS-specific software that requires formal training. However, it is a bounded, learnable skill — experienced**

REEDI/NatHERS Assessment Step	Nature of Competency Required	Existing Valuer Competency
		practitioners in the trial have been trained in days, not months. This is not a qualification gap; it is a software familiarisation requirement
Certificate generation and delivery to client	Standard document production and client delivery	**ALREADY HELD — CPVs produce formal professional reports and certificates as core business. NatHERS certificate generation is an automated software output**
Upgrade advisory communication to client	Communication of improvement recommendations based on assessment findings	**ALREADY HELD — Providing professional advisory opinions and recommendations to clients is the fundamental function of a CPV. This is precisely what valuers are trained, qualified and insured to do**

ASSESSMENT FINDING	Of 20 discrete assessment steps analysed, 19 involve competencies that qualified property valuers already hold through their formal education and professional practice. The single step requiring genuinely new skills — AccuRate Enterprise software operation — is a bounded training matter. This is not a qualification gap. It is a software familiarisation gap that should be addressed through a short-form, software-specific training module, not through a full VET Certificate IV.

Part 6: The Structural Problem — A Qualification Built to Exclude

5.1 CPP41119 Was Not Designed for Existing Homes Inspection

The fundamental structural problem with applying CPP41119 as the mandatory qualification for REEDI existing homes assessors is that the qualification was designed for a different task. The original NatHERS scheme — and the qualifications that underpin it — are grounded in a plan-based, pre-construction modelling methodology. Assessors work from building plans and drawings to model a building that does not yet physically exist, using software to simulate energy performance across climate zones.

Existing homes assessment is the inverse of this. The building is fully constructed and physically present. The assessor's primary task is accurate physical observation and data collection, not plan interpretation and software modelling from design documents. The skill sets required are almost diametrically opposed in their emphasis:

New Homes NatHERS Assessment (CPP41119)	Existing Homes NatHERS/REEDI Assessment
Works from building plans and specifications	Works from physical inspection of existing building
Building does not yet exist — modelling is predictive	Building is fully constructed — observation is empirical
Primary skill: software modelling from 2D drawings	Primary skill: systematic physical inspection and evidence collection
Plan reading and interpretation is central	Physical building element identification is central
Software must be run at design stage before construction	Software is run after physical inspection using collected data
No client property access required for core assessment	Client property access and consent are essential prerequisites
Output is a compliance certificate for NCC building approval	Output is a disclosure certificate for sale/lease transparency

This analysis demonstrates that the dominant skills in existing homes assessment — physical inspection, building fabric identification, evidence documentation, and client engagement — are precisely the skills in which qualified valuers have the deepest, most rigorously assessed competency. The dominant skills in new homes assessment — plan reading for design modelling and software-based predictive calculations — are a substantially smaller component of the existing homes task.

5.2 The Government Has Already Validated This Argument

Perhaps the most compelling evidence that qualified property valuers are competent to perform REEDI assessments is the design of the NatHERS Existing Homes Trial itself. The trial's 'Scale Stream' is premised on the following division of labour:

SCALE STREAM DESIGN	Banks partnered with property valuers to collect the data in the home. NatHERS assessors then work off-site to produce a home energy rating and trial certificate. Both streams use mobile devices with LiDAR technology to collect data in the home

and a cloud-based AccuRate Enterprise tool to conduct the assessment. — NatHERS Existing Homes Trial documentation, DCCEEW 2024

The government-designed Scale Stream explicitly assigns valuers to the in-home data collection role — the task that accounts for 19 of the 20 assessment steps in Part 5 of this paper. This is not incidental: it reflects a deliberate design decision that valuers are the most appropriate professionals for the physical inspection component of existing homes energy ratings.

The logical implication — which the Scale Stream model does not yet reach — is that qualified valuers with AccuRate Enterprise software training should be able to complete the full assessment cycle, without requiring a separate NatHERS assessor to perform the software entry step off-site. The Scale Stream currently fragments a unified inspection into two separate professional engagements where one would suffice.

5.3 The Artificial Separation of Data Collection from Rating

The current Scale Stream model creates an artificial boundary between data collection (assigned to valuers) and software data entry (reserved for NatHERS assessors). This boundary has no technical justification. The AccuRate Enterprise software for existing homes is not a complex analytical modelling tool requiring specialist thermal engineering knowledge — it is a structured data entry system that translates physical observations into a standardised calculation framework.

This is analogous to requiring that a valuer inspect a property and collect all market data, then hand that data to a separate 'software entry specialist' to input it into a valuation software platform and generate a report. No professional accreditation framework would tolerate such an artificial separation of professional responsibility.

AQF LEVEL OBSERVATION

CPP41119 is an AQF Level 5 qualification. The TAFE NSW Bachelor of Property Valuation is an AQF Level 7 qualification. It is not defensible on educational grounds to require an AQF Level 7 professional to obtain an AQF Level 5 qualification before they can engage in work that draws on a subset of their existing competencies. An RPL pathway is the appropriate mechanism for recognising the superior qualification in this context.

Part 7: Recommendations

The evidence set out in this paper supports the following specific recommendations for API advocacy with government, regulatory and training stakeholders.

Recommendation 1 — Establish a Formal RPL Pathway for Qualified Valuers

API should engage directly with ASQA and the Future Skills Organisation (FSO) to establish a formal Recognition of Prior Learning (RPL) pathway for CPVs and Associate Members seeking NatHERS/REEDI existing homes assessor accreditation. The evidence in this paper demonstrates that the substantive competency basis for RPL is present across the full qualification unit structure.

The RPL pathway should be designed as follows:

- RPL granted for all 4 core units and all Group A and Group B specialist elective units, on the basis of the TAFE NSW Bachelor of Property Valuation and/or two years of professional practice as a CPV or Associate Member
- RPL granted for all Group C general elective units on the basis of API's own professional governance, ethics, and CPD framework
- A structured software training module of 1-2 days in AccuRate Enterprise (existing homes mode) to address the sole genuine competency gap
- A supervised field assessment of 3-5 existing homes to demonstrate practical application of the NatHERS data collection protocol, with mentoring support

Recommendation 2 — Short-Form Training Package for AccuRate Enterprise

API should work with the NatHERS National Administrator and an accredited RTO to develop a dedicated, short-form training module specifically addressing AccuRate Enterprise operation in the existing homes context. This module should be positioned as a CPD activity rather than a qualification requirement, reflecting the bounded and software-specific nature of the competency gap.

Recommendation 3 — Engage the NatHERS National Administrator on a Third Assessor Pathway

The current NatHERS for Existing Homes Delivery Model contemplates two training and accreditation pathways, with consultation underway on additional pathways. API should make a formal submission to this consultation process, presenting the competency analysis in this paper as the basis for a dedicated 'Property Valuer Pathway' to NatHERS for Existing Homes accreditation.

Given that the NatHERS Administrator's own trial has already designated property valuers as the appropriate data collection professionals for the Scale Stream, there is a clear operational logic to formalising a valuer pathway that extends their role to full assessment completion.

Recommendation 4 — Challenge the CPP41119 Gate in Policy Submissions

In API's submissions to REEDI governance forums and in correspondence with relevant federal and state ministers, API should explicitly raise the inappropriateness of CPP41119 as

the sole qualification pathway for existing homes energy assessors. The analysis in this paper should be presented as a structured evidence base for that advocacy position.

Key arguments for these submissions include:

- CPP41119 was designed for new homes plan-based modelling, not for existing homes physical inspection — the qualification requirement is not fit-for-purpose for the task
- The government's own Scale Stream trial design validates valuer competency for the data collection role, which constitutes the overwhelming majority of the assessment task
- Requiring an AQF Level 7 qualified professional to obtain an AQF Level 5 qualification for a task substantially within their existing scope is disproportionate and educationally indefensible
- The artificial separation of data collection and software entry in the Scale Stream creates unnecessary complexity and cost that would be eliminated by a valuer-complete pathway with software training
- Workforce supply constraints will significantly limit the REEDI rollout if the assessor pathway remains restricted to CPP41119 holders — qualified property valuers represent a substantial existing workforce that could address this supply gap immediately

Recommendation 5 — Commission API Skill Assessment of Current Membership

API should conduct a brief survey of CPV and Associate Member competencies specifically mapped to the NatHERS existing homes data collection protocol, to produce a quantitative evidence base demonstrating the depth of existing competency across the membership. This would supplement the qualitative analysis in this paper with empirical data on actual practitioner competency.

Part 8: The ASQA RPL Framework — Why Exclusion Is Not Defensible

8.1 RTOs Are Mandated to Offer RPL

Recognition of Prior Learning is not a discretionary concession in the Australian VET system. Under the 2025 Standards for RTOs (which came into full regulatory effect on 1 July 2025), RTOs are legally required to offer RPL to all students, and Standard 1.6 specifically requires RTOs to ensure that prospective students with prior skills, knowledge and competencies are supported to seek RPL to progress through the relevant training product.

ASQA defines RPL as assessing competency acquired through formal, non-formal and informal learning to determine the extent to which an individual meets the requirements specified in a training package. This definition explicitly encompasses formal qualifications from other AQF levels and sectors, as well as professional practice experience. A CPV with an API-accredited degree and two-plus years of practice experience presents precisely the category of evidence that the RPL framework exists to recognise.

ASQA 2025 STANDARDS, STANDARD 1.6	RTOs must ensure that prospective students with prior skills, knowledge and competencies are supported to seek RPL to progress through the relevant training product. An RTO must be able to demonstrate to ASQA how it provides this support.

8.2 The Four Principles of RPL Assessment

The 2025 Standards require RPL assessments to comply with four principles: Fairness, Flexibility, Validity, and Reliability. The following analysis applies each principle to the valuer RPL case.

Principle	ASQA Requirement	Application to Valuer RPL
Fairness	The assessment must not disadvantage the student by requiring them to demonstrate skills in ways that are irrelevant to their prior experience pathway	Requiring a CPV to complete the full 15-unit CPP41119 course is precisely the type of unfairness ASQA identifies — it treats a high-level professional as if they have no relevant prior experience. The RPL pathway must be available and actively offered.
Flexibility	Assessment must accommodate the variety of experiences and learning pathways that students present	Valuers present a specific, high-value professional pathway — a formal AQF 7+ degree plus mandatory CPD and professional practice. The RPL process must be flexible enough to assess this pathway on its merits, not filter it through a course designed for a different audience.
Validity	Assessment must confirm that the evidence presented is consistent with the requirements of the training package	The competency mapping in Part 4 of this paper demonstrates unit-by-unit that the substantive requirements of CPP41119 are met by the valuation degree and professional practice. This constitutes the mapping documentation that an RTO requires to grant RPL.

Principle	ASQA Requirement	Application to Valuer RPL
Reliability	Decisions must be consistent and defensible based on the evidence presented	An RPL decision granting credit for the 14 matching units and requiring gap training in AccuRate Enterprise is entirely consistent and defensible, given the evidence base set out in this paper.

8.3 The Critical Caveat: RPL Is Not Automatic

ASQA's 2025 Practice Guide on RPL explicitly flags that automatically granting RPL for students who hold a higher AQF level qualification in the same industry is a risk to be avoided. API acknowledges this caveat and does not argue for automatic credit — it argues for a rigorous, evidence-based RPL process that properly maps the valuer's qualification and practice against the CPP41119 units, identifies the sole genuine gap (AccuRate Enterprise software), and provides a bounded, structured mechanism to address that gap.

The distinction is important: automatic RPL (which ASQA rightly cautions against) bypasses assessment. The RPL pathway API proposes requires formal assessment of evidence against each unit, conducted by a qualified assessor. What it avoids is the reflexive refusal to engage with the RPL process at all — which is the current de facto outcome when CPP41119 is treated as a mandatory enrolment for all assessors regardless of prior qualifications.

The API Rules of Professional Conduct further strengthen the case: the Rules define the 'valuation process' as requiring 'physical inspection of the tangible asset by the Primary Valuer', and describe a 'Primary Valuer' as one who 'personally and physically inspected the tangible asset, and undertook all the necessary enquiries, investigations, procedures and processes'. These definitions, which govern every CPV's professional practice, describe precisely the competency at the heart of the NatHERS existing homes assessment. The Rules do not merely acknowledge physical inspection — they mandate it as a prerequisite for a valid valuation. CPVs do not choose to inspect properties; they are professionally required to do so, under obligations enforced by API and, in many jurisdictions, by statute.

8.4 The NatHERS Administrator's Own Consultation on Additional Pathways

Critically, the NatHERS National Administrator has already acknowledged that the current single assessor pathway is insufficient for workforce scale-up. In November 2025, a consultation was opened on two additional training and accreditation pathways for NatHERS for existing homes, specifically designed to support expansion of the assessor workforce needed to meet expected demand increases ahead of Stage 2 in mid-2026.

This consultation represents the precise regulatory moment at which API's valuer pathway submission has maximum impact. The NatHERS Administrator is actively seeking to expand the pathway options and has acknowledged that additional mechanisms beyond the current 8-unit training package are needed. API's submission should be framed as a response to this consultation, presenting the valuer pathway not as a challenge to the existing framework but as the additional pathway the Administrator is seeking.

WINDOW OF OPPORTUNITY	The NatHERS Administrator's consultation on additional pathways closed December 2025, with Stage 2 targeted from mid-2026. API should seek urgent engagement with DCCEEW and the NatHERS Administrator to table the analysis in this paper as a pathway proposal for Stage 2 implementation. If the

valuer pathway is not included in Stage 2 design, it will be substantially harder to retrofit into the scheme's architecture post-launch.

Part 9: The Workforce Supply Argument — Scale, Access and Consumer Cost

9.1 Current Assessor Supply Is Critically Low

The NatHERS National Administrator has been explicit: the availability of NatHERS for existing homes assessors is 'currently very low.' Stage 1, which commenced in 2025, involved only approximately 40 trial assessors — a number wholly inadequate to service Australia's 11 million-plus existing residential dwellings. Design Matters National was named as the exclusive accreditor for NatHERS existing homes assessors in 2026 and began accepting applications from April 2026. Stage 2 from mid-2026 is intended to significantly expand capacity, but the pool of assessors trainable through CPP41119 alone represents a fundamentally constrained supply.

By contrast, API's membership — comprising CPVs, RPVs and Associates across all states and territories — represents a pre-qualified, geographically distributed, professionally governed workforce that could be mobilised rapidly if an appropriate training pathway existed. API has approximately 8,500 professional members nationally, including substantial numbers of residential specialist valuers (RPV and CPV Residential certified) who are already conducting property inspections in every market in which REEDI assessments will be required.

Supply Factor	Analysis
Current accredited existing homes assessors	Very low (Stage 1 trial: ~40 assessors). NatHERS website explicitly states 'availability of assessors is currently very low' and directs households to wait for Stage 2 from mid-2026
Residential Efficiency Scorecard (now closing)	Scorecard had approximately 150 accredited assessors at peak, serving 11,000+ homes nationally — indicating the scale of unmet demand. Scorecard is closing in June 2026, further reducing the available assessor pool at the exact time demand is expected to scale
CPP41119 pathway throughput	Certificate IV takes approximately 12-18 months to complete. The training package tender for NatHERS RTOs was opened in March 2026 with delivery to commence 2026. New assessors through this pathway will not be available at meaningful scale before late 2026 at the earliest
API CPV/RPV membership base	Approximately 8,500 professional members nationally, covering every residential market in Australia, already conducting physical property inspections as core practice — ready to be mobilised with software training only
Geographic distribution advantage	API members are located in every metropolitan, regional and rural market in Australia, including areas where CPP41119 RTO training providers have limited reach. An API-based pathway would produce assessors in markets where the CPP41119 training pathway cannot practically serve
Mandatory disclosure rollout timeline	The NSW Home Energy Rating trial is underway (ending 2025), informing the mandatory disclosure timeline. When mandatory disclosure at point of sale or lease is implemented — potentially from 2027-28 in leading states — demand for assessors will be measured in hundreds of thousands of assessments annually. The current assessor pipeline cannot meet this demand.
Consumer cost implications	Low assessor supply creates upward price pressure and geographic service gaps. An adequately competitive market — which the API pathway would help create — benefits consumers through competitive pricing, reduced wait times, and better geographic service coverage

9.2 The Valuer Pathway as a National Infrastructure Asset

The API membership should be understood not simply as a group of individual professionals seeking market access, but as a pre-existing national inspection infrastructure. Residential and commercial valuers already visit hundreds of thousands of properties annually under professional standards, governed insurance, and regulated conduct frameworks. This infrastructure has been built over decades at private expense; it is already geographically distributed, quality-assured, and client-facing.

Adding NatHERS existing homes assessment capability to this infrastructure — through a short-form software training program — is not creating a new industry function. It is extending an existing one with a defined additional output. The efficiency argument is compelling: rather than building an entirely new assessor workforce from scratch through CPP41119, the government could leverage an existing, quality-assured, professionally governed inspection infrastructure by addressing the single genuine competency gap.

STRATEGIC POLICY ALIGNMENT	The federal government has invested $32.7 million in the NatHERS expansion and has committed to net zero by 2050. The fastest path to a functional, scaled, consumer-accessible existing homes energy rating market is through the workforce that already exists — qualified property valuers. The CPP41119 gatekeeping requirement is not protecting quality; it is rationing access. An RPL-based valuer pathway serves the government's own policy objectives while generating immediate assessor supply.

Part 10: Counter-Arguments and Responses

API anticipates the following objections to the valuer pathway argument. Each is addressed below.

Counter-Argument 1: 'Valuers don't understand building science or thermal physics'

This argument conflates the depth of thermal engineering knowledge required for new homes software modelling with the practical building fabric observation skills required for existing homes assessment. The NatHERS Technical Note for existing homes does not require assessors to perform thermal calculations — it requires them to observe and record physical building characteristics, apply default values where observations are not possible, and enter data into AccuRate Enterprise, which performs the calculations.

The building fabric knowledge required — wall type, floor type, ceiling insulation, glazing, orientation, shading — is precisely the knowledge that valuers are trained and routinely examine. Valuers do not need to understand the Chenath thermal physics engine to observe that a wall is double brick, that a ceiling has no visible insulation, or that windows are single-glazed with aluminium frames. These are observation tasks, not engineering tasks.

Furthermore, the API Rules of Professional Conduct require valuers to assess the physical condition and construction of buildings as a mandatory component of the valuation process. Valuers who did not understand the difference between double brick and cavity brick, or between a concrete slab and a timber subfloor, could not produce a defensible valuation report. This knowledge is not optional for valuers — it is professionally mandated.

Counter-Argument 2: 'RPL is being used as an easy back door to qualifications'

ASQA's concerns about RPL mills and fraudulent RPL practices relate to high-volume, low-quality assessment models that issue qualifications without genuine competency assessment — typically targeting individuals who have no relevant background and use RPL as a migration or employment access mechanism. The API valuer pathway is the precise opposite of this scenario: it involves a cohort of formally qualified, professionally regulated practitioners with documented evidence of competency in the form of an accredited degree, professional certification, mandatory CPD records, and a portfolio of inspection reports.

The ASQA Practice Guide explicitly flags that the risk to avoid is granting RPL automatically based on a higher AQF qualification — API is not proposing automatic RPL. The proposed pathway involves structured evidence submission, formal competency assessment against each unit, and completion of a mandatory gap training program in AccuRate Enterprise. This is a rigorous, evidence-based, professionally credentialled RPL process that represents exactly what ASQA describes as 'performed well.'

Counter-Argument 3: 'NatHERS assessors need thermal performance expertise, not just inspection skills'

This counter-argument has merit in the context of new homes assessments, where plan-based thermal modelling requires understanding of the relationship between building design and simulated energy performance. It has significantly less force in the context of existing homes assessments, where the assessment method is explicitly designed to be completed by assessors observing physical reality, applying standardised default values for unverifiable inputs, and entering data into software that performs the modelling automatically.

The NatHERS Technical Note's provision for default values is telling: assessors are not required to test insulation, measure thermal conductivity, or calculate R-values. They are required to observe whether insulation is visible and, where it is not, to apply the age-based default. This is an empirical observation task, not a thermal engineering task. The software translates the observation into a thermal performance rating; the assessor does not.

The government's own trial design confirms this: in the Scale Stream, banks partnered with valuers to collect in-home data, with NatHERS assessors working off-site to produce the rating. If existing homes assessment required specialist thermal expertise at the point of inspection, the Scale Stream design would be incoherent — it would be assigning the technically demanding in-home work to valuers while retaining the less technically demanding data entry work for specialist assessors. The logic of the Scale Stream confirms that the in-home inspection is the task that valuers are qualified for.

Counter-Argument 4: 'REEDI needs assessors, not valuers'

This framing assumes that valuer and assessor are mutually exclusive categories — that the REEDI/NatHERS assessor is a distinct professional type requiring distinct professional formation. This is not supported by the assessment method. The NatHERS for existing homes assessment is a property inspection combined with structured data collection and software entry. The professional formation most aligned with that task is, as demonstrated throughout this paper, property valuation.

The 'assessor' label has been inherited from the new homes NatHERS scheme, where thermal modelling expertise is genuinely required and the professional formation is distinct from valuation. Applying the same label and the same qualification requirement to the existing homes context without critical examination is precisely the error that this paper identifies. REEDI needs competent inspectors. API has them. The CPP41119 gate prevents them from formalising this competency in the REEDI context.

Counter-Argument 5: 'Commercial valuers don't have residential inspection expertise'

This objection has partial merit for commercial-only specialists and does not apply to the broader RPV and CPV Residential cohort, who specifically specialise in residential property and constitute the primary target cohort for the valuer pathway.

However, even commercial specialists are not disqualified by this argument. The NatHERS for existing homes scheme covers residential dwellings (Class 1 and Class 2). All CPV holders have studied Residential Construction (or its equivalent) and all have been assessed on residential valuation methodology as part of their professional certification. The API CPV Residential and RPV certifications specifically require demonstrated competency in residential property inspection through submitted report samples and a professional interview.

A sensible RPL pathway design can address this by limiting the valuer pathway to CPV Residential and RPV holders as the primary cohort, with CPV (all classes) holders eligible subject to evidence of recent residential inspection practice. This is a manageable design parameter, not an argument against the pathway.

Counter-Argument 6: 'The NatHERS delivery model requires 8 specific training units'

The 8-unit training package for NatHERS existing homes assessors was agreed by all Australian governments in 2022 following consultation with an expert advisory group. It is not a statutory requirement — it is a policy design choice that is subject to review and amendment as the scheme matures. The NatHERS Administrator's own consultation on additional pathways confirms that the 8-unit requirement is not immutable.

The appropriate response to this counter-argument is not to abandon the valuer pathway but to engage with the NatHERS Administrator's pathway consultation to propose that the existing 8-unit framework be supplemented by a recognised prior learning pathway for holders of API-accredited qualifications. This is a pathway design question, not a competency question. The competency evidence is clear; the policy mechanism is what remains to be negotiated.

Appendix A: Draft RPL Evidence Framework for API Members

The following sets out a proposed evidence framework for a structured RPL assessment that an accredited RTO could implement for API members seeking NatHERS for existing homes assessor accreditation. This framework is designed to satisfy ASQA's requirements for rigorous, evidence-based RPL while providing a practical, proportionate pathway for qualified valuers.

A.1 Applicant Eligibility Criteria

To be eligible for the RPL pathway, applicants must hold one or more of the following:

- API Provisional or Associate Membership with CPV Residential or RPV certification (primary cohort)
- API Associate Membership with CPV (all classes) certification, with evidence of residential property inspection practice within the past 24 months
- Completion of an API-accredited degree conferring CPV or RPV eligibility (including all programs listed in Part 2 of this paper)

Applicants must also demonstrate current professional standing through valid API membership and current professional indemnity insurance as a minimum.

A.2 RPL Evidence Matrix by CPP41119 Unit

CPP41119 Unit	RPL Outcome	Evidence Required from Applicant
BSBRSK401 — Risk management	**RPL Granted**	API degree transcript + PVVAL304A or equivalent subject; OR declaration of professional risk management practice from employer or supervisor
CPPCOM4001 — Professional conduct and CPD	**RPL Granted**	Current API membership certificate + CPD record for preceding 3 years confirming minimum annual CPD hours; signed declaration of API Code of Ethics compliance
CPPHES4001 — Building elements and thermal performance	**RPL Granted**	Degree transcript showing Residential Construction subject completion; plus 3 sample valuation inspection reports demonstrating assessment of building fabric, materials and construction type
CPPHES4002 — Client advisory on thermal performance	**RPL Granted**	3 sample valuation reports demonstrating professional advisory communication to clients; plus evidence of client-facing advisory practice in professional role
CPPCMN4008 — Read plans and drawings	**RPL Granted**	Degree transcript; plus 2 sample reports referencing as-built plans; or declaration from supervising CPV of regular plan reading practice
CPPHES4003 — Computer systems for thermal performance	**Gap Training Required — AccuRate Enterprise module (1-2 days)**	No RPL — this is the genuine gap. Applicant must complete structured software training with a NatHERS-approved trainer
CPPHES4004 — Conduct thermal performance assessment (residential)	**Partial RPL + Supervised Practice**	RPL for data collection, inspection and client engagement elements (supported by 3 sample residential inspection reports); supervised practice

CPP41119 Unit	RPL Outcome	Evidence Required from Applicant
		requirement of 5 full existing homes assessments using AccuRate Enterprise with mentor assessor
CPPHES5001 — Complex residential assessment	**RPL Granted**	Degree transcript; plus evidence of complex residential or mixed-use inspection practice; or statement from supervising CPV of experience with multi-storey, multi-unit or architecturally complex dwellings
CPPCOM4002 — Safe work practices	**RPL Granted**	Current professional indemnity insurance certificate; employer WHS policy acknowledgment; or declaration of safe inspection practice consistent with API PropSec requirements
CPPHES4005 — Energy use and efficiency improvements	**Partial RPL + Short Training**	RPL for appliance observation and classification elements (supported by inspection report evidence); short online module on NatHERS appliance data specifications and Whole of Home rating methodology (4-6 hours)
CPPHES4006 — Water use and efficiency improvements	**RPL Granted (reduced evidence threshold)**	Declaration of professional practice noting observation of water infrastructure during inspections; plus completion of a brief NatHERS water module (2 hours)
CPPHES4007 — Thermal performance of existing residential buildings	**RPL Granted**	Degree transcript (Residential Construction subject); plus 3 sample residential inspection reports demonstrating systematic assessment of wall, floor, ceiling, glazing and building envelope characteristics
Group C General Electives (any 3)	**RPL Granted (all)**	API degree transcript, current API membership, and CPD records constitute sufficient evidence that generic professional standards competencies are met

A.3 Summary of Pathway Requirements

Requirement	Detail
RPL evidence portfolio submission	Degree transcript, CPD records, API membership certificate, PI insurance certificate, 3-5 sample inspection reports, employer or supervisor declarations as required per evidence matrix above
AccuRate Enterprise software training	1-2 day structured training with NatHERS-approved trainer; includes existing homes data entry, zone configuration, appliance modules, certificate generation; assessed by observation and demonstration
NatHERS protocol orientation module	Online self-directed module covering NatHERS Technical Note for existing homes, consent and privacy requirements, evidence collection protocol, audit obligations (estimated 4-6 hours)
Supervised practice assessments	5 supervised existing homes assessments completed under mentor assessor oversight, with assessment of data collection accuracy, software use, and certificate quality; assessed against NatHERS Technical Note requirements
Estimated total additional time commitment	Approximately 3-5 days of structured activity (software training + protocol module + supervised assessment mentoring), excluding the RPL evidence portfolio which relies on existing documentation
Estimated elapsed calendar time from application to accreditation	4-6 weeks for motivated applicant with documentation in order, compared to 12-18 months for full CPP41119 enrollment

A.4 Quality Assurance Mechanisms

To satisfy ASQA requirements and maintain confidence in the integrity of the pathway, the following quality assurance measures are proposed:

- All RPL assessments conducted by a qualified assessor holding TAE credentials and current NatHERS existing homes assessor accreditation, ensuring the assessor has current, relevant industry competency
- RPL evidence is verified against source documents (API member register, USI transcript, TGA certificate records) — declarations alone are not accepted as primary evidence
- Supervised practice assessments are subject to the same audit and quality assurance framework as all NatHERS existing homes assessments, providing independent verification of practical competency
- API provides a formal endorsement letter for each applicant confirming current membership status, certification level, CPD compliance, and professional standing — reducing the verification burden on the RTO while providing a high-confidence evidence source
- Outcomes are reported to ASQA in Total VET Activity data and to the NatHERS Administrator as part of assessor accreditation reporting

NOTE TO API EXECUTIVE	The draft RPL framework in this Appendix is designed to be operationally realistic — it specifies concrete evidence requirements, realistic time estimates, and quality assurance mechanisms consistent with ASQA's 2025 Standards. It should be reviewed by API's legal advisers and the relevant RTO prior to any formal submission to the NatHERS Administrator or ASQA. Indicative time and cost estimates should be validated with an appropriate RTO partner before being cited in advocacy communications.

Conclusion

This paper has set out a comprehensive, evidence-based case across ten parts and a draft implementation appendix. The core proposition — that qualified API members already hold the substantive competencies required for REEDI/NatHERS existing homes assessments — has been demonstrated through four distinct lines of analysis: unit-by-unit deconstruction of CPP41119, audit of the full ecosystem of API-accredited university qualifications, a 20-step operational analysis of the existing homes assessment itself, and application of ASQA's own RPL framework to the evidence base.

The evidence converges on a single, inescapable conclusion: CPP41119 is being used as a gatekeeping mechanism for an existing homes assessment role that it was not designed for, applied to a professional cohort that substantially exceeds its competency requirements, at a time when Australia's nascent existing homes energy rating market is critically undersupplied with qualified assessors. These three conditions — wrong qualification, over-qualified cohort, supply crisis — together constitute not just an advocacy argument but a policy failure that will materially impede the government's own net zero and housing disclosure objectives.

The pathway API proposes is practical, rigorous, consistent with ASQA's standards, precedented within API's own conditional accreditation model, and aligned with the NatHERS Administrator's stated need for additional assessor pathways ahead of Stage 2. The two decisions required — one from the NatHERS Administrator on pathway design, one from ASQA on RPL framework adequacy — are both achievable and consistent with existing policy frameworks. They do not require legislative change or new funding. They require only the recognition of what qualified property valuers already know and already do.

FINAL POSITION	API's position is clear: the current CPP41119 gatekeeping requirement for REEDI assessors is not a competency barrier — it is a credentialing barrier. The qualification was built without adequate regard for the existing skills of Australia's professional property valuers. API calls on the federal government, the NatHERS National Administrator, ASQA, and the Future Skills Organisation to work with API to establish the RPL-based accreditation pathway detailed in this paper. Australia's homes need to be rated. Australia's property valuers are ready to rate them.

Australian Property Institute | www.api.org.au | March 2026

This document has been prepared by the API CEO for internal policy and advocacy purposes. It draws on publicly available information from training.gov.au, the TAFE NSW degree curriculum, and the NatHERS National Administrator's published technical documentation.