

Ministry of the Environment and Spatial Planning

Dunajska cesta 48
1000 Ljubljana

Brussels, 23 November 2021

Ref: 179/21/CO

Dear Sir/Madam,

The Architects Council of Europe welcomed an earlier **Slovenian initiative to align the description of the architectural profession with the definition included in Directive 2013/55** on the recognition of professional qualifications.

However, ACE recently learned that this initiative has been abandoned, and steps are being taken to **generalise the project management role** – which was previously shared: architects having responsibility for buildings and engineers being responsible for engineering works.

A consequence of this action would be a **lowering of standards, with engineers being able to encroach upon the work of architects**. The quality of the built environment, and in particular, issues relating to the Renovation Wave and the Green Deal, need adequate treatment - as well as professionals with an adequate design-education; this is the case with architects and not with other professions.

The situation is further exacerbated by the **urgency caused by the availability of funding from the Recovery & Resilience Facility (RRF)**, which appears to have resulted in a **reluctance to use tried and tested, future and project orientated quality-based procurement methods such as Architectural Design Contests**.

The 2017 Reform Recommendations on professional regulation, up-dated by the European Commission in July 2021, describe the roles of the main construction professions – architects, landscape architects, spatial planner, chartered engineers and site engineers –

and indicate project management among the attributes of both architects and engineers within their field of competence.

The quality of architecture that is necessary to combat climate change, deliver the Green Deal and the Renovation Wave cannot be obtained if professional standards are eroded. The New European Bauhaus offers a unique opportunity to ensure that funds invested in renovation and climate neutrality are well spent and quality outcomes achieved.

ACE deplores any attempts to make approval of RRF funding and associated action plans conditional upon implementation of deregulatory measures, which are particularly incoherent in the light of the recently published OMC report "Towards a Shared Culture of Architecture" which – amongst others things – calls for **quality-based approaches to the procurement of intellectual services and best practice in public architecture competitions, while recognising the importance of high level architectural competences and skills.**

If the professions are to continue to play a positive role in the economy – and if the quality of professional services is to continue to preserve the EU model – it is necessary to recognise that professional regulation safeguards important public interest objectives – to protect both quality of service and the quality of life of citizens.

We urge the Slovenian legislator to re-consider the proposed deregulation of project management functions foreseen by the draft Construction Law.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'G. Pendl', written in a cursive style.

georg pendl
ACE President