



31 July 2025

National Competition Policy Analysis 2025
Productivity Commission
Locked Bag 2, Collins St East
MELBOURNE VIC 8003

**Joint Submission on behalf of Cross Border Commissioners and Counterparts in New South Wales, South Australia, Queensland and Victoria:
*National Competition Policy Analysis 2025***

We are submitting this response to highlight the heightened impact of skills mobility in cross border regions in response to the *National Competition Policy Analysis 2025*.

As Cross Border Commissioners and counterparts in New South Wales (NSW), South Australia (SA), Queensland, and Victoria, we work to facilitate improved outcomes for people and businesses in our cross border communities.

As a collective, we are focused on the administrative and regulatory challenges faced by communities located adjacent to or in some cases spanning multiple state or territory jurisdictions. We operate under a series of Memoranda of Understanding between our respective State and Territory Governments to advance priority focus areas and key initiatives affecting cross border communities and businesses. The importance of skills and labour mobility, particularly in relation to occupational licensing, is a key theme reflected in these agreements.

We acknowledge the sovereignty of each State and Territory Government to develop appropriate policy and legislative frameworks. However, we also recognise the value of collaboration and a considered approach to policy development which aligns with community expectations and supports shared outcomes across and within our respective jurisdictions.

This joint submission focuses primarily on identifying occupational licensing barriers under the Automatic Mutual Recognition (AMR) scheme, as well as highlighting other sectors where policy reform could enhance skills and labour mobility across state and territory borders.

Occupational Licensing

Together the Cross Border Commissioners and Counterparts in NSW, ACT, SA, Queensland and Victoria have a shared interest to improve mutual recognition of licensing and qualifications to promote skills and workforce mobility outcomes for cross border communities.

The Intergovernmental Agreement on the Automatic Mutual Recognition of Occupational Registration established a widespread uniform scheme for Automatic Mutual Recognition (AMR). The purpose of the scheme is to streamline the occupational licensing and **registration processes** when an individual is



seeking to work in a second or subsequent jurisdiction. However, even under these recognition schemes for licences and qualifications, barriers continue to persist to business operation and employment in cross border communities.

For example, though a state or territory may be a participating jurisdiction of the Automatic Mutual Recognition (AMR) scheme, conditions can be attached to licences identified under the scheme requiring already licensed professionals to undertake additional skills and training to meet requirements of the secondary jurisdiction in which they intend or seeking to work in.

These conditions can carry an additional burden of cost upon the licensee and at times be confronted with challenges in accessing the required skills and training barrier with no local option or alternative for the required training. This is particularly experienced across our respective cross border communities which are made up of regional, rural and remote communities.

Case Study Example:

A professional builder with approximately 30 years of experienced cross border licensing challenges due to differing requirements between New South Wales (NSW) and Victoria, necessitating separate licences for each state.

The builder received conflicting information from several licensing regulators, building and construction industry association, and local governments as to which of their NSW and New Zealand licences are recognised in Victoria under the Automatic Mutual Recognition scheme.

Additionally, Victorian regulations required further training to undertaken to prepare for these licences. The training requirement was for a waterproofing course which was estimated to cost approximately \$5,000.

Although courses are offered through free TAFE, the required courses are only available in Bendigo or Melbourne making it inconvenient and was an additional barrier for builders located in the cross border region.

The above case study is not isolated in its nature, it is particularly problematic for builders working in cross border regions like Albury/Wodonga, Broken Hill, Tweed Valley, Mildura, Mount Gambier and more broadly experienced across a number of trade professions.

The objective of AMR schemes is to enable labour and skills mobility of individuals beyond their home jurisdiction by removing additional fees and reducing the administration burden to help drive economic outcomes and improved productivity. However, in practice this is not always the case and the above case study example represents a misalignment of policy intent and with the desired outcome.

We also highlight to the National Productivity Commission for consideration, unlicensed skills which are not covered under existing recognition schemes. As a result, unlicensed skills training lacks portability. For example, unlicensed skill training obtained in one jurisdiction are commonly not recognised in another, requiring individuals seeking to work across border to undertake duplicate training. Further to



this, different jurisdictions have different requirements in how to retain and maintain this type of skills training.

This significantly impacts the hospitality sector, particularly in areas with cross border communities which consequently feels the direct impact of these restrictions and hinders developing a skilled workforce and creating additional pressure on an already limited regional labour supply.

Other sectors of policy for reform

TAFE Subsidy Schemes: The fee free TAFE scheme is nationally funded and jurisdictional based, meaning a student living in Victoria cannot access the fee free TAFE scheme beyond their state border into another jurisdiction, e.g. South Australia. This creates a financial inequity in relation to how cross border students access education. This is further complicated in a cross border environment due to the availability and access to TAFE providers that are nearby within a state or territory border that is of reasonable access. As mentioned, our cross border communities are made up of regional, rural and remote communities whereby options for TAFE alternatives may in fact cross a state or territory border.

In some cases, the closest and available TAFE option for a student may in fact be across their state border into another jurisdiction. It is this tension between fee free TAFE options in a cross border context, that brings an inequity in access under the fee free TAFE schemes and requires great consideration in the areas for reform to reduce unnecessary barriers to education. We do note under the fee free TAFE schemes that eligibility extends to working in the state of which you intend to study, despite residing in another jurisdiction. We also note that State of Victoria they do recognise designated cross border regions e.g. a student from NSW or SA that resides in a border region is eligible to access the fee free TAFE scheme within Victoria.

Standards of a national approach to licensing: As we look towards a national approach to synchronise occupational licensing we bring to the National Productivity Commission the awareness at a jurisdictional level, our concerns on an approach which favours the highest standards towards occupational licensing. In respecting the jurisdictional right and a need to necessitate more stringent approaches to particular licences, we do ask that a considered approach for a middle ground option as a principle, rather than highest standards, as this would create a cascading impact on reducing labour and skills mobility.

We acknowledge and welcome the announcement by the Australian Federal Government as part of the Budget 2025-26 the work towards designing a national licensing scheme for electrical occupations and recognise the shared benefits of a national approach.

In South Australia the Office of the Cross Border Commissioner is undertaking a dedicated research project assessing cross jurisdictional recognition of training, certificates, accreditations and registration systems.



We would welcome any opportunity to contribute further to *National Productivity Commission Analysis 2025* and to policies that meaningfully consider the vulnerabilities cross border communities face.

Thank you again for the opportunity to make a submission and for your consideration.

Yours sincerely

Kelly-Anne Saffin

Cross Border Commissioner- South Australia

On behalf of:

Mr Brett Davis

Cross Border Commissioner (Victoria)

Mr Ian Leavers APM

Cross-Border Commissioner (Queensland)

Ms Kalina Koloff

Cross Border Commissioner (New South Wales)