

29 August 2025

National Competition Policy analysis 2025
Productivity Commission
Locked Bag 2, Collins St East
Melbourne Vic 8003

Via online portal

AGWA Response to National Competition Policy analysis 2025 Interim report

The Australian Glass and Window Association (AGWA) welcomes the opportunity to respond to the Productivity Commission's interim report and appreciates the focus on occupational licensing and international standards.

AGWA is the peak body for the Australian glass and window industry. It is committed to improving standards and workmanship across all facets of the glass, glazing and windows industry. It provides accreditation services to over 1,200 companies to ensure the best quality products and services come from accredited AGWA members. Its members are a broad amalgamation of glass and window manufacturers, fabricators, glass processors, glaziers, merchants, suppliers, educators, regulators, and professional stakeholders and bodies, focused on ensuring a professional and sustainable industry.

We provide the following responses to the Commission's two information requests, supported by industry-specific data and insights.

- **Information Request 1: Examples of Legislation Where International or Overseas Standards Could Be Adopted or Recognised**

AGWA acknowledges the theoretical benefits of harmonising standards but due to the risk profile, complexity, and building typology variations we are not aware of any international legislation or standards that could be adopted for our sector without rigorous contextual review and industry engagement. Further to this:

- **Safety Glass Standard (AS 2208):** This standard is tailored to Australia's climate. European toughening methods, designed for cooler climates, differ significantly in quench and heat cycles. Applying European standards in Australia risks non-compliance with performance requirements due to thermal stress failures.
- **Complexity of Standards Interdependence:** AGWA contributes to 28 standards via 15 technical committees. The Australian standards process is designed to consider interdependencies between standards. Adopting international standards without this context risks incompatibility and defects in product design and installation.



- **Cost and Compliance Burden:** Increasing the number of applicable standards without performance-based translation multiplies compliance pathways. This impacts designers, certifiers, and builders who must navigate overlapping and potentially conflicting standards.
- **Limited Representation in International Forums:** Australia's voice in international standard-setting is often limited to a single representative, which may not adequately reflect national interests. This undermines the ability to advocate for standards suited to Australia's unique conditions.

AGWA recommends:

- Sector-specific performance equivalency assessments and extensive industry engagement must be undertaken before any consideration of adopting international standards.
 - Continued prioritisation of national harmonisation across states and territories.
 - That the Productivity Commission recognises that international standards may be used under the current NCC via performance solutions, but only when assessed by qualified professionals as being compatible and fit for purpose.
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- **Information Request 2: Data on Productivity Impacts from Occupational Licensing Reform and Interstate Mobility**

AGWA supports a nationally consistent licensing framework for glaziers and other high-risk trades to promote good work health and safety practices, as well as a safe built environment for occupants. Data from Victorian public hospitals shows that from 2015/16 to 2023/24 there were 4,299 unintentional presentations to emergency departments due to glass injuries from windows, doors, shower screens and mirrors. Key data points include:

- **Workplace Injury Rates:** Unlicensed glaziers experience the highest rate of workplace injury among trades, exceeding carpenters, electricians, plumbers, roofers, and bricklayers. This not only affects worker wellbeing but also imposes significant costs on employers through lost time, insurance claims, and rework, and underscores the safety risks of unregulated practice. The lack of licensing contributes to unsafe practices, non-compliant product selection, and poor workmanship, which in turn leads to reduced productivity and increased liability across the construction sector.
- **Training Deficit:** According to Jobs and Skills Australia, only 56.1% of glaziers have undertaken formal training. While Queensland and NSW show higher training rates, the national inconsistency contributes to a skills gap and reduced productivity. The absence of a national licensing framework results in fragmented skill development, limiting labour mobility and reducing the overall efficiency of the glazing workforce.
- **Regulatory Gaps:** In many jurisdictions, individuals can advertise and operate as glaziers without licensing, insurance, or knowledge of the NCC and relevant standards (e.g., AS/NZS 2208, AS 1288, AS 2047). This exposes the public to unsafe practices, non-compliant production selection, and undermines industry professionalism.



- **Productivity Drain:** Inconsistent licensing leads to rework, safety incidents, and reduced labour mobility. AGWA supports micro-credentialing for minor glazing tasks (e.g., shower screens, retrofits) to improve workforce flexibility and safety.
- **Nationally consistent licensing** at a minimum, and where the head contractor is licensed to contract and be contracted for the work, would be ideal. This would support upskilling, while simultaneously driving improved accountability through greater transparency. While concurrently this would also improve labour allocation and mobility, through nationally consistent and understood requirements for trade and semi-skilled supporting work under supervision.
- **Micro-Credentialing for Minor Licences:** AGWA recommends the introduction of minor glazier licences supported by micro-credentialing for specific tasks (e.g., shower screens, window retrofits). This would enhance safety and compliance for lower-risk tasks, and support labour mobility and upskilling, especially for workers entering the trade or transitioning between roles.

AGWA proposes:

- A national licensing scheme for glaziers aligned with NCC requirements.
- Minor licences are supported by skill-set training pathways.
- Integration of licensing reform with broader workforce development initiatives to address the long training gap.

Conclusion

AGWA urges the Commission to consider the nuanced risks and benefits outlined above. Reforms to occupational licensing and standards must be grounded in local context, safety imperatives, and industry expertise. We welcome further engagement to support the final report.

Do not hesitate to contact me.

Yours sincerely,

Clinton Skeoch
Chief Executive Officer

