

Response to the Productivity Commission's Interim Report on National Competition Policy Analysis 2025

Submitted by Resources Safety and Health Queensland (RSHQ)

Introduction

Resources Safety and Health Queensland (RSHQ) appreciates the opportunity to respond to the Productivity Commission's Interim Report on National Competition Policy Analysis 2025. RSHQ is Queensland's independent regulator for safety and health in mining, quarrying, petroleum, gas, and explosives industries.

Occupational Licensing

RSHQ notes that the interim report acknowledges that Queensland has opted out from AMR. AMR is not universally appropriate due to safety, security or jurisdictional differences and flexibility must be maintained to allow jurisdictions to opt out of AMR where justified. This is particularly relevant for high-risk industries – such as mining, gas and explosives.

RSHQ continues to apply Mutual Recognition (MR) where feasible, ensuring that interstate workers meet Queensland's rigorous safety and competency standards. This approach is particularly critical in areas such as gas work, explosives occupational authorities, and mining certifications (e.g., Site Senior Executive Notices and Ventilation Officer Certificates), where automatic recognition could compromise safety due to variations in qualifications and regulatory expectations.

We particularly note the Commission's view in the Interim Report that a national occupational licensing system would improve labour mobility, reduce regulatory duplication and enhance productivity. While we support the intent of the reform, we highlight the following considerations for the Commission—

- Safety-critical roles require tailored licensing standards that reflect the complexity and risk profile of each occupation. A one-size-fits-all approach may undermine public safety and not take into account local safety issues.
- Regulatory oversight must remain robust, with clear accountability mechanisms across jurisdictions.

International Standards Harmonisation

RSHQ maintains that harmonisation with international standards should be pursued selectively and only where it enhances safety and aligns with local conditions. The report's findings that a majority of mandated Australian Standards are bespoke and not internationally aligned reflect the reality of our regulatory environment.

In high-risk domains such as electrical mining and explosives licensing, automatic adoption of international standards may introduce risks, increase costs, and require legislative changes. RSHQ supports a case-by-case assessment of standards, ensuring that local lessons, environmental factors, and industry-specific needs are incorporated into national frameworks.

We particularly endorse an approach that maintains standards that reflect Australia's unique regulatory and safety priorities, and we encourage continued engagement with industry regulators to ensure harmonisation efforts are risk informed.

Conclusion

RSHQ supports an approach to reform which recognises the importance of tailored regulation in high-risk industries, particularly the resources sector which is the area RSHQ regulates. We support the continued use of MR over AMR where appropriate and advocate for a cautious, evidence-based approach to international standards harmonisation. We also support an approach for standards harmonisation that ensures regulatory, and safety issues are prioritised.

RSHQ's primary mandate is the protection of worker and public safety. RSHQ maintains that regulatory flexibility is essential to uphold the rigorous standards required to safeguard lives.

We appreciate the opportunity to comment on this interim report and look forward to further contributing to the review to support effective, risk-informed regulatory frameworks.