

5 September 2025

Catherine de Fontenay & Alex Robson
Commissioners
Productivity Commission

Sent via online submission portal

Dear Commissioners,

Response to the *National Competition Policy analysis 2025 Interim Report*

Consult Australia is the industry association representing businesses in design, advisory and engineering consulting, an industry comprised of over 58,600 businesses across Australia. This includes some of Australia's top 500 companies and many small businesses (97%). Our members provide solutions for individual consumers through to major companies in the private sector and across all tiers of government. Our industry directly employs over 285,000 people in architectural, engineering, and technical services and many more in advisory and business support. It is also a job creator for the Australian economy; the services we provide unlock many more jobs across the construction industry and the broader community.

I was pleased to note that the Interim Report considered many of the issues we raised in our [June 2025 submission](#) especially with respect to Automatic Mutual Recognition and the cost of standards, especially those mandated in legislation.

In response to the Interim Report, Consult Australia:

- **supports interim recommendation 1**, particularly:
 - review legislation that is inconsistent across jurisdictions and agree to harmonise regulated standards across Australia
 - update legislation to enable compliance with current versions of incorporated standards where appropriate.
- **supports interim recommendation 2**, that governments should fund access to standards in legislation.
- **supports interim recommendation 3**, that the scheduled independent evaluation of Automatic Mutual Recognition be instigated.

I would be pleased to discuss Consult Australia's position on the above in detail.

Yours sincerely,

Kristy Eulenstein
Head of Policy and Government Relations