Electrical Trades Union

National Competition Policy Analysis 2025

August 2025

Response to the Interim Report on National Licensing and Standards

5 September 2025

Acknowledgement

In the spirit of reconciliation, the ETU acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all First Nations peoples today.

Overview

The ETU welcomes this opportunity to response to the Productivity Commission's Interim report on National Competition Policy Analysis 2025.

The Electrical Trades Union of Australia ('the ETU')[1] is the principal union for electrical and electrotechnology tradespeople and apprentices in Australia, representing well over sixty-thousand workers around the country.

Strong Australian Standards, including the adoption of Internation Standards that reflect the Australian context, our legislation and wiring systems are critical to maintain the safety and compliance of electrical installations, the generation facilities, transmission and distribution networks.

This submission complements the original submissions that we made to this review. We do not repeat all arguments in favour of national licencing or against automatic adoption of international standards from those submissions and instead respond directly to key areas of concern in the interim report.

National Licensing

ETU members make up a critical pillar of the licensed electrical workforce responsible for delivering the Australian Government's commitments on providing a more efficient, affordable, and secure emissions-free energy network, including building renewable generation and storage projects and transmission projects. Strong licensing provisions at a national level are critical to support labour mobility to support the energy transition and associated efficiencies in the electrical contracting industry, while maintaining the safety quality of electrical work.

We note that the Productivity Commission is taking a narrow lens of how to determine whether national licencing is a preferable model:

> *For national licensing to be preferable, the ongoing compliance and administrative cost savings must be greater than the initial costs of transition.*

While the ETU has sought to quantify the financial benefits of a move to national licensing in our original submission, the benefits of national licensing over and above Automatic Mutual Recognition cannot be determined solely on a financial basis. There is a value to workplace safety and reducing workplace fatalities that cannot be reduced to a simple cost-benefit

[1]Being a division of the CEPU, a trade union registered under the *Fair Work (Registered Organisations) Act 2009* (Cth).

analysis.

Approaches to licence interoperability

The ETU is proud of Australia's system of licensing in Australia.

The Productivity Commission cites previous research that "found no compelling evidence that any jurisdiction had set standards at a low enough level that would cause community expectations of safety and quality to not be met".

However, a review of currently electrical licensing across the states finds significant differences between jurisdictions. We find that it remains possible for one to enrol in the Cert III electrotechnology in NSW and SA without a contract of training (an apprenticeship) and gain completion of the Cert III and the Capstone assessment in under two years without any on the job training and be able to successfully apply for a license. Such slipshod standards do not accord with community expectations. Whilst uncommon, adopting a national licence would ensure that safety and quality were maintained at all times.

This is significantly lower than requirements in other states and would clearly cause community expectations and safety and quality of training not to be met if the community was aware of the lesser standards and safeguards that are exploited by some RTOs in these states.

Secondly, the ETU advocated in our submission for the adoption of a national linesworker licence. In our submission, we noted that while electricians and linesworkers are regulated to some degree in all states and territories, with sound licensing and compliance legislation applicable to the work in most states and territories. Western Australia and New South Wales do not have a licence for linesworkers but have announced an intention to introduce one.

The current transmission buildout, which underpins Australia's transition to Net Zero, relies on a significant FIFO and/or DIDO workforce that moves between states to follow the work. Currently, linesworkers in Western Australia and New South Wales are excluded from this work, even under AMR regimes, as they have no licence to recognise. In this context, the electrical trades – including electrical linesworkers – are an ideal case for the adoption of national licensing.

The current national licensing reform is an opportunity for state and territory regulators to work with industry to harmonise licensing in electrical occupations according to the highest standard and also ensure the development of the linesworker licence in WA and NSW which adopts the highest standard from across the states.

Finally, the research quoted by the Productivity Commission ignores that, under the current AMR scheme, if a person holds multiple licences, and breaches a licence in one jurisdiction, then this breach will only impact at most one of those licences,. In other words, under the current AMR regime, it is possible that someone holding licences in multiple states could lose a licence in one state, while retaining their licence in (an)other state(s) and thus still be lawfully entitled to perform licensed work *even in the jurisdiction where they lost their licence*.

The ability for a person to keep working in one state after having lost their licence is plainly contrary to community expectations of safety and quality.

Estimating the economic benefits of reforms

In estimating the economic benefits of reform, the Productivity Commission should consider the actual differences between licensing arrangements, the cost and benefits of these differences, and how they are borne by workers, consumers, firms, and other sectors.

For example, increased safety standards will lower the burden on health systems and decrease lost work hours. Neither of these are mentioned in the interim report.

The ETU notes the Productivity Commission's comments concerning different licensing options. Frankly, the ETU does not consider these arguments persuasive. The comments are based on selective quotes from an outdated study which itself lacked context or nuance. Further, the introduction of additional classes of licence would, necessarily, introduce further complexity to the system and, critically, diminish labour mobility. Finally, it is worth noting that the broad outcomes sought to be achieved in foreign jurisdictions, in terms of training standards, are reflected in post-trade training in Australia[2].

Since the 2015 report was published, the ETU has observed a substantial increase in cross border mobility for work among the electrical workforce. This is largely due to drastic increase in electrical work arising from the twin energy transitions on both the supply (ie renewable generation) and demand (ie electrification) side. The ETU has witnessed a substantial increase in FIFO and DIDO work, reflecting the increasing and acute workforce shortages and an increase in rural and remote work.

In quantifying the benefits of increased labour mobility, the Productivity Commission has measured the benefits to individual workers of greater labour mobility. In addition, there are broader macroeconomic impacts of increased workforce mobility. Specifically, the role of increased workforce mobility in reducing labour scarcity and smoothing the peaks and troughs of work. In the context of the transition to Net Zero, the import of this mobility is amplified.

ETU members already move between states to work on different, fixed term projects. This simultaneously provides a consistency of income for these workers, and consistent pipeline of workers when projects start. However, in doing so, ETU members must navigate multiple licensing regimes and, where applicable, AMR standards.

Implementing reform

The ETU does not agree that the Automatic Mutual Recognition scheme offers a suitable alternative to National Licensing.

As the Productivity Commission notes, there are jurisdictions that are not party to the AMR scheme, which places limits on interstate mobility. Furthermore, ETU members report substantial shortcomings with the current operation of the AMR system, which includes (but is not limited to):

[2] see, for instance, the Certificate IV in Industrial Automation and Control or the Certificate IV in Renewable Energy

National Secretary Michael Wright
PO Box 380 Rosebery NSW 2018 Suite 408, Level 4, 30-40 Harcourt Parade, Rosebery NSW 2018 (02) 9663 3699 (02) 9663 5599

- Workers not registering with the regulator when moving between states.
- Workers not familiarising themselves with the requirements in the state that they seek AMR in.
- A lack of clarity regarding the scope of license in the new state and the regulatory and compliance requirements required.

For these reasons, the ETU argues that any system that relies solely on improving registration systems and communication between jurisdictions (p. 16) would put electrical workers and the community at risk.

As noted in detail in the Union's original submission, the issues and conflicts in the AMR are poorly understood by the broader industry and electrical workers, leaving electrical workers at risk of non-compliance with state and territory legislation, and at risk of carrying out work unsafely and to be subject from enforcement action, infringement or prosecution. National licensing presents a pathway to harmonise the scope and preconditions of electrical licenses across participating States and Territories, providing certainty to workers about the work they are authorised to perform when working across State boundaries.

Continuing professional development

Finally, we note that some states have also introduced Continuing Professional Development (CPD) as a condition of the license, acknowledging that professional development is an essential component in electrical licensing. Continual training in skills like mandatory testing are essential for the adoption of new best practice and safe working methods. Continuing professional development (CPD) is a requirement of continuing license to perform electrical work in only a handful of jurisdictions. In those jurisdictions, CPD ensures that developments in technology and best practice are translated across the industry with consistency. This allows for electrical workers to be drivers of technological and safe working improvements in their workplaces.

In the AMR scheme, a worker transferring to a jurisdiction with CPD requirements is immediately authorised to commence licenced work in that jurisdiction despite not having complied with CPD requirements applicable to those who principally reside in the jurisdiction. This introduces risk of a knowledge gap between workers with local registration and workers relying upon the AMR scheme for registration.

A national licensing scheme will ensure a more consistent application of CPD requirements as part of a national license. CPD inherently inculcates the changing nature of the electrical industry, with the introduction of new technologies and practices, CPD requirements will lift safety across the industry by requiring electrical workers to maintain awareness of and be trained in how to deal with these changes.

Standards

Interim finding 1: Mandated standards largely align
Interim finding 2: Economic benefits from harmonising Australian regulated standards with international or overseas standards

Information request: *The PC is seeking specific examples of Australian legislation where international or overseas standards could be adopted or recognised as equivalent, including any information or data on the expected costs and benefits of alignment.*

Overseas standards may be technically sound, but they are developed in different legal, environmental, and policy contexts. Automatically adopting them could mean ceding Australia's sovereign right to assess what works best for our economy, environment, and safety systems — despite the Australian Government formally recognising Standards Australia as the nation's peak standards body.

The Standards Australia assessment process of international standards provides a national reference point for regulators who often adopt reference to standards in legislation and facilitates safe technological adoption providing clear regulatory pathways for manufacturers and installers. For example, AS/NZS 4777.2 (Grid connection of energy systems via inverters) ensures that home solar systems interact safely with the grid. This standard has adopted international content and is relevant to the Australian context.

Automatic adoption of international, regional and overseas standards is not consistent with targeted and risk-based development of regulation especially in the regulation of high-risk work. The process by which Australian Standards are developed draws upon a wealth of evidence that is collected by state and federal regulators and allows for evaluation in detail of the effectiveness of the regulation and the nature of the risks to be managed by the regulation in an Australian context.

Standards Australia, with input from the ETU and other technical experts from across the electrotechnology industry, plays an essential role in the development of Australian Standards that meet our context and wiring systems. The governing document in electrotechnology is AS/NZS 3000 the wiring rules. This document has been developed over many years and is referenced in state and territory legislation. The wiring rules has been developed, reviewed and edited over many interactions relevant to the Australian wiring systems and considering emerging technologies and international standards.

Standards Australia assesses international standards for relevance and suitability in the Australian context. This process benefits industry, regulators, technological advancement and safety outcomes and the process is essential in the field of electrotechnology for reasons discussed above.

Standards Australia actively participates, through technical experts, in the International Electrotechnology Commission (IEC) and other international bodies to bring world leading international standards to Australia. This engagement ensures that Australian standards and/or international standards adapted or directly adopted bring the latest safety, technological advancement and efficiency in fields such as electric vehicles infrastructure, renewable energy and energy storage.

National Secretary Michael Wright
PO Box 380 Rosebery NSW 2018 Suite 408, Level 4, 30-40 Harcourt Parade, Rosebery NSW 2018 (02) 9663 3699 (02) 9663 5599

The assessment of international standards for the Australian context (our unique physical and regulatory environment) ensures that international standards are not used unsafely or inappropriately and take into account how a standard should be adapted to suit our:

- Climatic conditions and bushfire risk
- Electrical safety regulatory regime
- High temperatures and UV exposure

Interim recommendation 2: Governments should fund access to standards in legislation

As we argued in our original submission, the ETU supports the Productivity Commission's recommendation to that government should "facilitate (or low-cost) access to standards incorporated in legislation".

Australian standards are critical to work in the electrical trades, and are a core part of keeping electrical workers, consumers and the community safe, and their work legally compliant. Given this, the ETU believes that these standards should be provided free of charge to licenced electrical workers (including apprentices).

National Secretary Michael Wright
PO Box 380 Rosebery NSW 2018 Suite 408, Level 4, 30-40 Harcourt Parade, Rosebery NSW 2018 (02) 9663 3699 (02) 9663 5599