AUSTRALIAN GLASS & WINDOW ASSOCIATION

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Productivity Commission
Locked Bag 2, Collins St East
Melbourne Vic 8003

Via online portal (Make a submission | Engage - Productivity Commission)

## AGWA Response to *Five pillars of productivity inquiries*

The Australian Glass and Window Association (AGWA) welcomes the opportunity to selectively respond to the Information requests as detailed Productivity Commission's *Five pillars of productivity inquiries* Interim reports.

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.

There is a growing need for regulatory settings to be both responsive to technological change and supportive of industry capability. To maintain compliance and competitiveness, regulation should offer clarity and consistency while enabling simpler pathways to achieve established standards. Importantly, regulatory reform must not be confused with lowering standards. Simplifying the process to meet high standards is a positive step; reducing the standards themselves is not. Where certain sectors struggle to meet these standards, the appropriate response is targeted support - not deregulation. By proactively addressing these dynamics, reforms can resolve inefficiencies and better prepare the industry for future challenges, aligning regulatory approaches with both industry requirements and societal expectations.

- ### Creating a more dynamic and resilient economy

*2.1 . . . duplicate and inconsistent regulations*

Addressing duplication and inconsistency in regulatory frameworks is essential for removing barriers that hamper innovation and the adoption of best practices. The National Construction Code (NCC) is a prime example of regulatory inconsistency across states and territories. Variation across jurisdictions of scope, breath and timing of implementation of the NCC is a barrier to productivity, as regulatory uncertainty and inconsistency undermines a resilient and vibrant construction industry.

For the construction sector, a harmonised approach would not only streamline compliance for industry participants but also enhance confidence in long-term investments and drive technological advancement. By reducing duplicate and inconsistent regulations, the industry can focus its efforts on delivering higher quality outcomes for consumers and broader community benefits, thus laying a foundation for progress in areas such as energy efficiency, resilience, and workforce development.

- **Investing in cheaper, cleaner energy and the net zero transformation**

*3.1 . . . national resilience rating system*

AGWA recognises that aligning regulatory frameworks, particularly those related to energy efficiency, is essential in driving both environmental and economic outcomes. With a focus on residents, the development of a national resilience rating system would create the foundation for protecting building occupants while also assessing and promoting energy-efficient materials and construction practices throughout Australia.

Provided the rating system comprises transparent criteria and focuses on consumer-beneficial outcomes and government accountability, such a system would enable clear benchmarking on resilience, as well as fostering innovation in building design, construction and product development.

AGWA encourages collaboration between government, industry, and other stakeholders to ensure that a national resilience rating system is practical, inclusive, and tailored to the unique needs of the Australian construction landscape.

- **Building a skilled and adaptable workforce**

*2.1 . . . impacts and use of credit transfer and RPL*

As AGWA noted in our earlier submission, recognition of prior learning (RPL) has been a longstanding problem in trade industries. For the glazing industry there are substantial numbers of highly skilled but unqualified workers. Due to the lack of licensing to date, workers have been able to learn the trade on the job. At this point, only 56% of people that call themselves glaziers have completed tertiary training, all others are self / industry trained.

The current RPL framework is often a very low priority for RTOs as it features low funding, requires high support, involves extensive administrative management and recording of evidence, which then just discourages providers from offering RPL and individuals seeking a qualification. When offered, the process is time-consuming and costly, with an individual seeking an RPL assessment often being told that the service is not offered or may be delayed for 6-12 months until a critical mass of students is achieved to make it a viable option for the RTO. In addition, the requirements for a successful RPL can differ between locations and training providers.

In aggregate, this assessment roadblock further disenfranchises and ignores those in the workplace without a formal qualification that nonetheless have skills and knowledge obtained from both formal and informal learning, and these issues compound and exacerbate the challenges faced by indigenous people, those with a disability, people living in regional and remote locations, women, mature-aged workers, and people from culturally and linguistically diverse backgrounds.

### *2.2 . . . national credit database*

AGWA has identified concerns regarding the inflexibility of current credit recognition practices, particularly when minor curriculum updates render prior learning invalid (for example, changes to a core unit such as first aid certification). AGWA recommends that issues related to time-based validity and potential barriers to course innovation be considered during database design.

To address ongoing gaps and optimise qualification pathways, AGWA proposes the implementation of a robust, nationally consistent framework for credit recognition. This approach would ensure equitable acknowledgment of all forms of prior learning, whether obtained through formal education or extensive industry experience. By establishing a national credit database encompassing both accredited and non-accredited expertise, the system would more accurately reflect varied career progressions and adapt to contemporary industry benchmarks. Such measures would enable workers to build upon their foundational knowledge and embrace technological advancements, while employers would gain access to a wider pool of qualified candidates. Additionally, combining these reforms with transparent guidelines and adaptable acceptance criteria would strengthen the responsiveness of the training system and promote innovation within the sector, thereby setting the stage for the targeted financial incentives and tailored advisory services to follow.

### *2.4 financial incentives for SMEs*

AGWA endorses recognition of both accredited and non-accredited training, noting SMEs gain most from micro-credentials and step-by-step skill improvements. AGWA suggests funding limits should apply per business based on their overall number of employees, rather than simply per employee. This gives businesses flexibility in terms of training spending.

Financial incentives are vital for SME skills development in glazing and construction. Targeted funding - like wage subsidies, training grants, and support for national or cross-border courses - can help SMEs offset upskilling costs and encourage apprentice hiring. These measures would lower financial risks, boost workforce growth and mobility, and improve safety and quality standards across the sector.

### *2.5 . . . SME advisory services for training provision*

Industry associations play a key role as skills in construction and manufacturing evolve rapidly. Advisory services should focus on building managerial and digital skills. Industry specific support tailored for SMEs can address knowledge gaps, helping both employers and workers adapt to new qualification paths and training options. By combining industry engagement with accessible digital tools and ongoing guidance, businesses can find suitable upskilling opportunities, keep up with changes to regulations, and benefit from new credit and licensing systems. This approach promotes a flexible, skilled, and safety-conscious workforce, laying the groundwork for more unified and forward-thinking occupational entry at multiple skill levels, and licensing standards.

*3.1 . . . occupational entry regulations*

AGWA challenges the perspective that existing occupational entry regulations are overly stringent, noting that the environment often experiences an absence of sufficient enforcement or prosecution. These conditions are not merely a regulatory hurdle – they are the cornerstone of consumer protection, workplace safety, and industry professionalism, and exist to ensure that work is completed safely, and with appropriate care and skill. It allows consumers and others to assess competency and help ensure that workers have the necessary skills and are accountable for the work they do. We recommend adopting nationally a hybrid licensing framework – that integrates both individual and company-level licenses - as implemented in NSW. Additionally, AGWA advocates for minor licensing and micro-credentialing to enhance career pathways while maintaining industry safety standards.

AGWA supports universal occupational licensing complemented by minor licenses, which would be validated through skill sets tailored to specialised sectors within the industry. For example, glaziers may dedicate their careers exclusively to shower screens or pool fencing without requiring expertise in window or door glass replacement. In such cases, completing the entire Certificate III in Glass and Glazing is unnecessary, as employers are unlikely to support apprenticeships for qualifications only marginally relevant to specific roles, and individuals are similarly disinclined to pursue largely irrelevant coursework. Incorporating skill sets and minor licenses into the RPL (Recognition of Prior Learning) and licensing model stands to increase the number of qualified professionals, enhance training outcomes and completion rates, and promote a positive perception of training within segments of the industry that currently lack formal qualification.

In conclusion, AGWA urges the Commission to consider the nuanced risks and benefits outlined above. Reforms must be grounded in local context, safety imperatives, and industry expertise and we welcome ongoing engagement.

Do not hesitate to contact me on 02 9498 2768 or [redacted] should you wish to discuss further.

Yours sincerely,

**Clinton Skeoch**
Chief Executive Officer