ENGINEERS
AUSTRALIA

Productivity Commission Submission

Response to the PC interim report on Building a Skilled and Adaptable Workforce

Productivity Commission Submission - Building a skilled and adaptable workforce

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Introduction

As Australia's national peak body for engineering, Engineers Australia is the voice and champion of our 140,000-plus members. Engineers Australia is a mission-based, not-for-profit professional association, constituted by Royal Charter to advance the science and practice of engineering for the benefit of the community.

We commend the work of the PC in its interim report on *Building a Skilled and Adaptable Workforce*. On the topics of Occupational Entry Regulations (OER) and Recognition for Prior learning (RPL), we provide some additional context, clarification and recommendations for the PC's consideration.

Occupational Entry Regulations (OER)

Engineers Australia supports the Productivity Commission's intent to identify occupational entry regulations reform opportunities to improve productivity, labour mobility and national competitiveness.

This additional submission aims to demonstrate that, **for the engineering profession, occupational entry regulations should be maintained. There is an opportunity to simplify with nationally consistent alignment to enable effective use of Automatic Mutual Recognition (AMR)**. This will provide benefits for productivity, competitiveness and labour mobility for both individuals and businesses.

Do engineers really need to be registered to provide professional services?

Yes. The most critical reason to maintain OER and ongoing registration requirements for professional engineers is to protect the safety of, and manage significant risks to, individuals, communities, and critical infrastructure.

Safeguarding individuals, communities and critical infrastructure

Similar to many occupations, an objective for professional engineering OER and ongoing registration is to protect the safety of consumers and address information asymmetry when recipients of engineering services are selecting engineering service providers. Engineering is an innate part of everyday life. Without thinking, we trust that the cars, roads, buildings and electronic devices we use will work and not harm us. Because of that trust, preserving the integrity of engineering practice is vital. Registering engineers is therefore critical because it ensures engineering professionals meet benchmarked education, training, professional conduct and competency standards. It allows consumers to feel confident in the abilities of the engineers they hire and the products they use.

Given the breadth and range of operating contexts for engineers, this can translate to protecting the safety of one household who engages a sole trader structural engineer to advise on the renovation of a wonky deck, to a very different scenario whereby a supply chain of multinational engineering consultancy firms, their suppliers and subcontractors, are engaged by a state government to deliver a complex megaproject redesigning community water infrastructure, treatment, accessibility and amenity.

Case Study: NT Tower Flaws – A Cautionary Tale on the Importance of Engineering Registration

In 2020, the Northern Territory's Building Practitioners Board (BPB) found structural engineer [redacted] guilty of professional misconduct following an investigation into multiple non-compliant apartment buildings across Darwin and Palmerston. [redacted] had certified flawed concrete transfer slabs — critical structural components — in at least nine multi-storey buildings. In one case, his under-designed slab led to a catastrophic building failure, only discovered when cracks appeared mid-construction, putting workers and the public at risk.

The BPB concluded that [redacted] had engaged in a pattern of negligent or incompetent conduct, failed to maintain proper records, and refused to cooperate with auditors. He was deregistered and fined the maximum penalty of $6,320. The board noted that it was only good fortune that no one was injured and that the defects were identified before occupancy.

This case highlights the critical role of engineering registration in protecting not just individual consumers, but entire communities and infrastructure. It demonstrates how registration enables regulators to intervene, investigate, and remove unsafe practitioners from the profession.

However, it also exposes a major gap in Australia's current system: in the Northern Territory, engineering registration only applies to the building sector. This means that even in the case of deregistration for serious safety breaches, a person could legally continue working on other major infrastructure projects — such as roads, bridges, or energy systems — without any registration or oversight. Or, they could simply move to another jurisdiction.

Case Study: Queensland – Residential Retaining Wall Collapses

The Board of Professional Engineers of Queensland disciplined a Registered Professional Engineer who was engaged to design and certify a retaining wall constructed on a residential property. The engineer provided the certification even though it was not a true representation of the actual design and construction, failed to show any provision to control and minimise erosion, infiltration or runoff of water, and the design was contrary to the relevant Australian standards, among other identified issues.

The retaining wall collapsed five years later. The Tribunal found that the engineer's conduct "demonstrated a lack of understanding of, or regard for, the engineering practices and principles required to safely design and certify the retaining wall".

Case Study: Unregistered Engineering Practice in Queensland

A recent case in Queensland highlights the risks of allowing unregistered individuals to perform engineering work. An individual, referred to as "N", was engaged to inspect a damaged retaining wall and subsequently produced a report, design drawings, and a compliance certificate—despite not being a Registered Professional Engineer of Queensland (RPEQ).

At the time, N held only a diploma and was still studying for a bachelor's degree. He falsely presented himself as a RPEQ and failed to comply with a formal request for documentation during the investigation.

The matter was resolved in court, with N admitting guilt to all charges. While no conviction was recorded due to it being a first offence, N was penalised and ordered to pay costs.

This case underscores the importance of mandatory registration. Without it, individuals lacking the necessary qualifications and oversight can misrepresent themselves, potentially compromising public safety and infrastructure integrity.

In these cases, however, it is about safeguarding communities and the critical infrastructure they rely on. Engineers play a central role in designing and maintaining systems that underpin housing, energy transmission, water supply, transport networks, and even – in the case of biomedical engineers – the operation of life-saving and life-enhancing medical devices. Failures in these systems can have widespread and devastating consequences, as shown in the case studies below.

Applying high-level judgement to high-risk activities

OER and ongoing registration are essential to public confidence in engineering services because the services themselves require a high level of judgment and navigating complexity. For example, the Victorian registration scheme refers to a "professional engineering service" as an engineering service that requires, or is based on, *the application of engineering principles and data to a design relating to engineering, or a construction, production, operation or maintenance activity relating to engineering.*

Such services are therefore likely to require:

- Interpretation and application of complex standards
- Scientific calculations
- Selection and judgement of products, processes and applications
- Identification, assessment and management of complex safety and security risks
- Dealing with ethical, safety and sustainability issues.

While specific data is not available, anecdotally, Engineers Australia has heard from members that since Victoria introduced its engineering registration scheme, less remedial engineering work has been required. Less remedial work suggests that safety risks are being better managed by engineers who have met registration standards.

Research consistently demonstrates a strong correlation between safer engineering projects and more efficient project delivery, challenging the outdated notion that safety is an impediment to speed and cost-effectiveness. A 2015 study highlighted this, finding that projects with proactive safety measures not only had fewer accidents but also experienced significant improvements in productivity and project timelines.[1] This is supported by research from the *Journal of Construction Engineering and Management*, which found a direct link between higher injury rates and an increase in project rework, indicating that poor safety practices often lead to substandard quality.[2]

Both engineers and their clients value the signal sent by registration that an engineer has been vetted as not only qualified, but also competent and experienced. This is evidenced by Engineers Australia's successful National Engineering Register (NER), established in 2015. As a publicly searchable database, the NER gives individuals and businesses access to a qualified pool of engineers, endorsed by Australia's engineering peak body. In the absence of nationally consistent engineering registration, the NER works alongside statutory state registration to provide a mechanism for engineers to have their qualifications and experience recognised across the country.

Engineers Australia members report that obtaining and displaying the NER credential is a way to showcase their skill, talent and experience to prospective employers and clients, particularly in jurisdictions without a legislated registration scheme, but this cannot be a substitute for a statutory registration scheme which is enforced by empowered regulators.

Regulation is enforceable and can be proactive in removing bad actors from the system.

The statutory regulator for the profession in each state and territory has the power to receive complaints about engineering services and investigate and prosecute persons for breaches of relevant

[1] Kappes, S. D., & Hinze, J. W. (2015). *The relationship between safety and productivity*. Construction Management and Economics, 33(3-4), 253-263.
[2] Hinze, J. W., & Gambatese, J. A. (2003). *The relationship between project safety and project performance*. Journal of Construction Engineering and Management, 129(3), 295-300.

legislation. Such powers ensure that registered engineers adhere to professional standards, and also that unqualified people do not purport to be registered engineers.

Without these essential OER and ongoing registration schemes, anyone can legally purport to be an engineer and deliver professional engineering services, including designing and certifying risky infrastructure and systems that may impact whole communities – such as bridges, fire safety systems, amusement park rides, and power systems.

Professional bodies such as Engineers Australia are voluntary membership bodies. While we play a role within co-regulatory frameworks—such as those operating in jurisdictions like Queensland—as the internationally recognised as custodians of engineering standards in Australia. We support alignment with global benchmarks, enabling consistent standards in both education and professional practice. While we can investigate complaints made against our own members and can remove their membership credentials, we do not:

- have the power to conduct statutory investigations (including entering premises and seizing records),
- apply regulatory sanctions (including imposing penalties such as de-registration and monetary fines), or
- prevent an unqualified individual from providing engineering services.

Only statutory regulators have the authority to implement requirements of legal instruments (such as Professional Engineers Acts) which are not within the power of membership bodies. Beyond cancelling membership in accordance with organisational procedures, these organisations do not have any legal framework to investigate or prosecute bad actors.

Case Study: Board of Professional Engineers Queensland (BPEQ)

BPEQ publishes case notes and de-identified summaries of disciplinary proceeding and prosecutions; these demonstrate the breadth of engineering services for which poor practice can lead to significant safety risks. These include slab and footing designs for residential housing; structural design and certification of multi-storey apartment buildings, swimming pools, and roofing; soil testing and the preparation of geotechnical reports; appropriate housing design for cyclonic regions; utilities works; air conditioning and ventilation systems for community facilities; safety inspections for amusement rides; and directing the release of water from dams during a flood event.

In 2023–2024, the Board of Professional Engineers Queensland (BPEQ) received 14 formal complaints, with 9 requiring further action — including investigations and potential disciplinary measures.

OER and ongoing registration for engineers reflect international practice

The importance of registration for engineering professionals is recognised globally. Countries such as the United States, Canada, Japan, South Korea, Taiwan, Turkey, Mexico, Chile, Italy, Spain, Germany, Poland, Hungary, Greece, Slovakia, and the Czech Republic all have mandatory registration or licensing schemes for engineers. These systems ensure that only qualified, competent professionals are authorised to carry out work that affects public safety and national infrastructure.

The table below lists a sample of countries where registration is required for engineers.

Country	Registration Body / System	Notes
United States	State Boards via NCEES (PE License)	Required for public practice
Canada	Provincial Engineering Regulators (P.Eng.)	Title protected by law

Japan	Institution of Professional Engineers (IPEJ)	National exams required
South Korea	HRD Korea (Professional Engineer License)	National licensing system
Singapore	Professional Engineers Board (PEB)	Professional examination required
Malaysia	Board of Engineers Malaysia	Professional examination required
Taiwan	Taiwan Professional Engineers Assoc.	Certification exams required
Turkey	Chamber of Engineers	Mandatory for public works
Mexico	Dirección General de Profesiones	A license is required to practice
Chile	Colegio de Ingenieros	Registration is required for practice
Italy	National Council of Engineers	Title “Ingegnere” protected
Spain	Colegio de Ingenieros	Mandatory for legal practice
Germany	Regional Chambers (Ingenieurkammer)	Title protected regionally
Poland	Polish Chamber of Civil Engineers	Required for certain disciplines
Hungary	Hungarian Chamber of Engineers	Mandatory for public works
Greece	Technical Chamber of Greece (TEE)	Required for engineering practice
Slovakia	Slovak Chamber of Civil Engineers	Registration is required for practice
Czech Rep.	Czech Chamber of Authorised Engineers	Required for public projects

Is the bar to practice as a registered engineer in Australia set too high?

No. Engineering is a terrific example of an occupation with recognised global practice standards, which support international labour mobility and public confidence in the profession around the world.

Internationally-aligned standards for entry-to-practice and independent practice

Australia is a signatory to the International Engineering Alliance Washington, Dublin and Sydney Accords – each aligned to a different level of engineering qualification. These Accords, which have been in place over multiple decades and are supported by the IEA, establish internationally benchmarked standards that are used to accredit Australian engineering programs at over 50 institutions, as well as assess the qualifications of skilled migrant engineers. This international alignment of OER supports our engineering workforce and firms to be both internationally competitive and an attractive destination for global engineering talent. The engineering profession is recognised as having one of the most mature systems for mobility.[3] It is this system that underpins the standards for statutory registration in Australia.

The IEA also sets out, under the International Professional Engineers Agreement and the APEC Engineer agreement, the global competence standards for professional engineers. Together with the support of the World Federation of Engineering Organisations (WFEO) and UNESCO, we have

[3] Ziguras, C. (2021). Mutual Recognition of Professional Qualifications in the Asia Pacific: Lessons from the Inventory of Mutual Recognition Agreements in APEC (Version 1). RMIT University. https://doi.org/10.25439/rmt.27401766.v1

developed the IEA Graduate Attributes (entry to practice) and Professional Practice Competencies (independent practice).

Countries with mandatory registration systems—such as the U.S., Canada, Japan, and many in Europe—require engineers to meet not only the initial educational requirements, but also the experiential, competency and ethical standards before practising.

Again, managing safety and risk is central to the need for professional competency standards. According to the IEA:

> *Engineering seeks to produce solutions of which the effects are predicted to the greatest degree possible, in often uncertain contexts. While bringing benefits, engineering activity has potential adverse consequences. Engineering, therefore, must be carried out responsibly and ethically, use available resources efficiently, be economic, safeguard health and safety, be environmentally sound and sustainable and generally manage risks throughout the entire lifecycle of a system.*

Australia's statutory engineering registration schemes also require professional engineers to have five years of relevant experience to practice independently (the final year of study may constitute work experience if it includes a significant work-based component). Graduate engineers with less than the experiential requirement can still deliver engineering services under the supervision of a registered engineer. Again, this is consistent with international practice. US states and territories require four years of acceptable work experience for a professional engineer (P.E.) license; Canadian provinces also require four years, while some provinces require that at least one year must be experience in Canada. Both the US and Canada also go further, requiring an exam for professional registration, while Canada also has language requirements.

Are engineering registration schemes in Australia working well enough to maintain the status quo?

No, because the inconsistent registration schemes across states and territories are costly and hamper productivity. And unfortunately, the arrangements have become increasingly inconsistent between jurisdictions over time.

Engineers are a critical occupation for the nation.

Any handbrake to engineering productivity is a handbrake on the nation.

The engineering profession has long been a core contributor to Australia's gross domestic product (GDP) and key industries, adapting over time to meet evolving needs. Engineers play a crucial role in technological development - a key driver of productivity and economic growth. Over half of industry value added in the economy is generated through just six engineering-heavy segments of the private sector, including mining and infrastructure.

There are 433,353 engineers participating in the labour force, with 243,157 working in engineering occupations. Engineering is a key part of Australia's STEM talent pipeline.

Much like the Australian Government's statement to progress nationally consistent licensing of electricians, Australia should have a nationally consistent approach to all engineers in the workforce. Both occupations perform high-risk activities and are critical to national priorities for housing, infrastructure and energy. National consistency would improve productivity and competitiveness while maintaining quality and safety standards.

The current patchwork of engineering registration schemes is hampering engineering productivity and competitiveness – and is costing consumers.

The engineering workforce is increasingly mobile, with many engineers working across jurisdictions; but it is also subject to fragmented and inconsistent state-based registration schemes, largely introduced over the past 3-5 years. Unlike trades, engineers can provide engineering services anywhere in Australia from anywhere in Australia.

While Queensland has had engineering registration for nearly 100 years, the recency of registration in other states and territories reflects a community safety response to high-profile disasters, such as Opal Towers in NSW and combustible cladding in Victoria.

Australia should not wait for another disaster to elicit consistent and comprehensive engineering registration.

Currently, there is an inconsistency across the various schemes:

- legislative frameworks
- regulatory bodies
- sector focus
- areas of engineering
- competency assessment models
- areas of engineering
- CPD requirements
- record-keeping requirements.

This patchwork of regulation has led to significant complexity, as shown in the table below:

Category	QLD	VIC	NSW	ACT	WA	SA	TAS	NT
Established	1929	2021	2021	2024	2024	TBA	2016	1993
Act	Professional Engineers Act	Professional Engineers Act	Design & Building Practitioners Act	Professional Engineers Act	Building Services Regulation	-	Building Act	Building Act
Sector Focus	Range – 19 Areas of Engineering	Range – 5 Areas of Engineering	Building only – 6 Areas of Engineering	Range – 5 Areas of Engineering	Building only – 4 Areas of Engineering	-	Building only – 3 Areas of Engineering	Building only – 3 Areas of Engineering
Regulator	Board of Professional Engineers QLD	Business Licensing Authority	Building Commission NSW	ACT Planning	DEMIRS	TBA	Consumer, building, occupational services	NT Building Practitioners Board
Assessment model	Co-regulatory	Co-regulatory	Building Commission NSW	Co-regulatory	Co-regulatory		CBOS	Building Practitioners Board

Economic Costs to Industry

Credentialing data from Engineers Australia's Business Partnerships reveals the financial impact of fragmented registration:

- Engineering firms often pay multiple registration fees for employees working across jurisdictions.
- Credentialing costs for large firms (e.g., Jacobs, Beca, BG&E, WGA) range from $100,000 to over $500,000 annually.
- A very rough conservative estimate puts engineer registration costs for industry at $144 million annually (240,000 engineers x $300 per registration x 3 states (Average number of

states engineers work across) – $300 x 240000 (registration cost in their home state)). Larger firms shoulder more of this cost as their engineers work across more jurisdictions.

- Firms report significant duplication in CPD tracking, competency assessments, and compliance documentation.

These costs are not just financial—they also reduce productivity and delay project delivery, particularly in infrastructure, energy, and defence sectors.

Confusion for engineers

Consider an electrical engineer who lives and works in Victoria. They are registered in their home state and want to design a solar or wind farm in the ACT. Thanks to Automatic Mutual Recognition (AMR), they can do this without needing to re-register.

However, if they want to do the same work in Queensland, they must pay additional fees and register again, because Queensland has not signed up to AMR.

In New South Wales, they wouldn't need to be registered at all — unless they were designing the electrical system for a building, such as the construction team's temporary accommodation. In that case, registration would be required, but only for that specific building-related work. This would be the same in Western Australia, where registration is only required for engineers working in the building sector.

In the Northern Territory, only civil, structural, and mechanical engineers need to be registered — not electrical engineers. A similar situation is true in Tasmania, who only register civil, fire safety and building services engineers, but building services could include electrical engineers depending on the type of work.

This inconsistency makes it difficult for engineers and their employers to understand where registration is required, and under what conditions. It creates unnecessary barriers to mobility and adds cost and complexity to national projects.

Could AMR work more effectively?

Absolutely. Engineers Australia strongly urges the PC and the Australian Government to consider engineering registration as a priority case study for reform, not to remove OER and jeopardise safety standards, but to uncover what it would take to achieve **nationally consistent registration** for this critical occupation and share learnings on how best to utilise and revitalise Automatic Mutual Recognition's (AMR's) potential.

The internationally recognised framework provides a basis for alignment.

As described above, engineering is one of the few professions globally that benefits from a well-established, internationally recognised framework for qualifications and professional competence.

Importantly, this international framework can also support mobility within Australia. If all states and territories adopt registration schemes that are aligned with IEA standards, then Automatic Mutual Recognition (AMR) can function as intended — enabling engineers to "register once, practise anywhere" across the country.

Engineering is unique in having this level of international standardisation. Professions such as law, teaching, and even some trades do not have equivalent global frameworks. This makes engineering an ideal candidate for national harmonisation of OER, using the IEA framework as a foundation.

By aligning domestic registration schemes with international standards, Australia can reduce regulatory duplication, enhance labour mobility, and ensure that its engineers remain globally competitive — all while maintaining the highest standards of public safety and professional integrity.

There is wide stakeholder support for national consistency.

As the PC identified in its interim report (page 72), multiple participants, including Engineers Australia, BCA, ICA, and Master Builders Australia, have highlighted the challenges and costs associated with inconsistent licensing across states and territories and the need to pursue licensing interoperability.

The South Australian Government has this month confirmed with stakeholders that it is now pursuing a national harmonisation registration scheme for engineers. South Australia has raised the proposal to include a national harmonised registration scheme for professional engineers at the recent Small Business Ministers' Meeting, and has also written to the Treasurer to formally request consideration.

Participants at Minister King's Construction Productivity Roundtable in July 2025 also identified, among other key issues, that for the construction industry:

- Getting the planning and design phase right is the most essential phase to improving productivity
- National consistency in skills recognition is needed
- There is a role for the Commonwealth in driving harmonisation and national consistency in areas like regulation and workforce skills, and planning.

The Australian Government can take a proactive leadership role.

Given where Australia finds itself in this complex regulatory landscape, Engineers Australia believes the most practical and pragmatic step towards national harmonisation of the current fragmented approach is by utilising AMR as it was intended.

The most effective way to progress this is for the Australian Government to lead harmonisation efforts through the National Cabinet. The Australian Government could:

- signal a national priority for nationally consistent engineering registration (similar to electrician licensing)
- Use engineering registration as a case study to urgently progress, streamline and revitalise AMR for the engineer profession and occupational mobility more broadly
- support a shared digital platform for registration, renewals, and data sharing across jurisdictions
- use the national competition policy (NCP) framework to incentivise reform, and
- tie such reform to the national productivity fund requirements.

State and territory governments can also proactively move towards nationally consistent registration through practical action:

- Harmonise legislation to adopt consistent definitions of engineering services, areas of practice, and registration requirements.
- Align competency assessments and CPD obligations with national and international benchmarks to ensure consistency and fairness.
- Enable full participation in Automatic Mutual Recognition (AMR) without scope limitations, allowing engineers to "register once, practise anywhere."
- Recognise nationally approved assessment entities, such as Engineers Australia, to streamline registration and uphold professional standards.

Recognition for Prior Learning

Tax credits for SME work-related training should include student placements.

Engineers Australia supports the PC's draft recommendation for the Australian Government to trial financial incentives (such as a tax credit) to increase work-related training for SMEs. Engineers Australia suggests that this recommendation should extend to work-integrated learning (WIL) for tertiary students completing a placement as part of their course.

The Universities Accord report evidences the benefits and strong links between WIL and positive students, university and industry outcomes. WIL continues to be an essential component of developing authentic learning and assessments.

We support investment in models of cooperation for WIL that incentivise employer-paid WIL placements and increase financial support for students undertaking placements. Engineers Australia recommended to the Universities Accord that more incentives, such as tax concessions, are needed for industry to provide more paid WIL placements to support students in completing the required placement hours.

International standards and professional accreditation can support consistency across courses.

We note the PC's Draft Recommendation 2.1 to "*Move toward a national system of credit transfer and recognition of prior learning (RPL)"* and the "*The Australian Tertiary Education Commission, as steward of the tertiary education system, should play a role in establishing the database and enforcing consistent and accurate data collection from providers."* We support such an approach.

We also note the example the PC cites on page 34 regarding engineering, that *"Because Australian universities have significant freedom in their course design, the structure of degrees and the content of subjects vary across providers. For example, foundational mechanical engineering units may not contain the same subject material in two different universities, which can act as a significant barrier to granting credit."*

We appreciate the general point the PC is seeking to make; however, in the case of course credits, RPL, and student mobility, it is likely that university engineering course design **is more consistent across Australia's 37 universities**, compared to other education disciplines, such as in the social sciences.

That is because Australia is a signatory to the International Engineering Alliance (IEA) and Engineers Australia's deep involvement through the Australian Engineering Accreditation Centre (AEAC), which undertakes voluntary accreditation of 37 universities offering engineering degrees in Australia, in line with the IEA Washington, Sydney and Dublin Accords for entry-to-practice competencies.

This provides a number of student, teacher/academic and national economic benefits, including:

1. Domestic interoperability - enabling broadly consistent engineering offerings among Australian universities, enhancing the potential for RPL, particularly in the first and second years of engineering study, before students specialise in a chosen field, e.g. mechanical, chemical or civil engineering.

2. International labour mobility – both for teachers and students. The reasons universities undertake and pursue voluntary accreditation were well articulated in a series of facilitated

interviews with universities conducted by Engineers Australia in 2024. The comprehensive feedback from the staff interviewed (3 to 4 from all 37 public universities) viewed Engineers Australia accreditation as valuable, primarily as the mechanism to ensure all students meet a consistent global minimum standard.

3. Consistent Migration Qualifications Assessment – Australia's skilled migration program is built on assessment providers (of which Engineers Australia is one) providing skills assessments for potential migrants. The international Accords enable Australia to have increased confidence in the internationally aligned competencies and qualifications of engineers.

A strength of professional accreditation for engineering is that it is outcomes-based and internationally aligned. It provides the opportunity for universities to deliver learning in their areas of strength, while maintaining sufficient foundational content. Such professional accreditation can provide a valuable framework for collaboration between education providers, industry and professional bodies to achieve greater alignment on RPL, help smooth student transition across providers and courses, and reduce any 'wastage' of a student's prior learning and education investment. Engineers Australia would be happy to explore this further with the Productivity Commission.