Queensland
Government

Please quote: MC08/EP

Department of the
Premier and Cabinet

15 AUG 2003

Mr Tony Hinton
Commissioner
Productivity Commission (MRA)
PO Box 80
BELCONNEN ACT 2616

Dear Mr Hinton

Thank you for providing copies of the Productivity Commission's Draft Research Report entitled "Evaluation of the Mutual Recognition Schemes." As you would be aware, the Queensland Government forwarded a submission to the Productivity Commission earlier this year and Queensland maintains an interest in the issues under review.

The Queensland Government broadly supports the draft report. However, in the consultation process conducted across Queensland Government agencies on the draft report, one issue of significance has been raised that I would like to draw to your attention.

This concerns the ability of registration authorities to properly address the issues surrounding the 'equivalence of occupations' concept under mutual recognition legislation.

This matter was raised by the Queensland Government registration authorities responsible for safety and health in the mining, explosives and petroleum and gas industries. The primary focus of these areas of government is to maintain conditions which mitigate the safety and health risks to workers and the public in relation to these industries.

The registration authorities have expressed concern that mutual recognition can result in a 'lowest common denominator' approach to registration of individuals from other jurisdictions which, in turn, can compromise safety and health in these industries. The registration authorities have sought clarification of their ability to impose conditions on the registration of individuals from other jurisdictions.

It is noted that the draft report deals with this issue but more clarification may be needed in the final report.

Executive Building
100 George Street Brisbane
PO Box 185 Brisbane Albert Street
Queensland 4002 Australia
Telephone +61 7 3224 2111
Facsimile +61 7 3229 2990
Website www.premiers.qld.gov.au
ABN 65 959 415 158

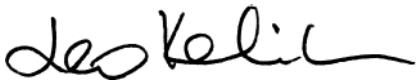
The draft report implies that the 'equivalence of occupations' issue is not being dealt with consistently across jurisdictions, for example

- at Page 14 - 'registration boards seem to make use of their right to impose conditions on registration to achieve equivalence' and
- at Page 79 - 'some participants in the current review believed that the mutual recognition legislation already allows them to impose conditions, such as attendance at a training course on local issues'.

There appears to be a need to clarify the processes used by registration authorities to determine equivalence of occupations and the conditions which can be imposed on registration to achieve equivalence. One way of approaching this would be to develop guidelines which could be consistently applied by registration authorities across jurisdictions.

Thank you for the opportunity to provide further comment on this matter.

Yours sincerely



Dr Leo Keliher
Director-General