

6 June 2025

National Competition Analysis 2025
Productivity Commission
Locked Bag 2, Collins St East
Melbourne VIC 8003

By online portal: www.pc.gov.au/inquiries/current/competition-analysis-2025

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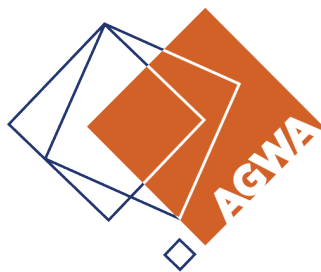
The Australian Glass and Window Association (AGWA), the peak national body for the Australian glass and window industry, welcomes the opportunity to provide a submission on the Productivity Commission's National Competition Policy analysis 2025, notably on occupational licensing and international standards.

AGWA 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. AGWA is committed to improving compliance, standards, and workmanship across all facets of the glass, glazing and windows industry.

- **Occupational licensing**

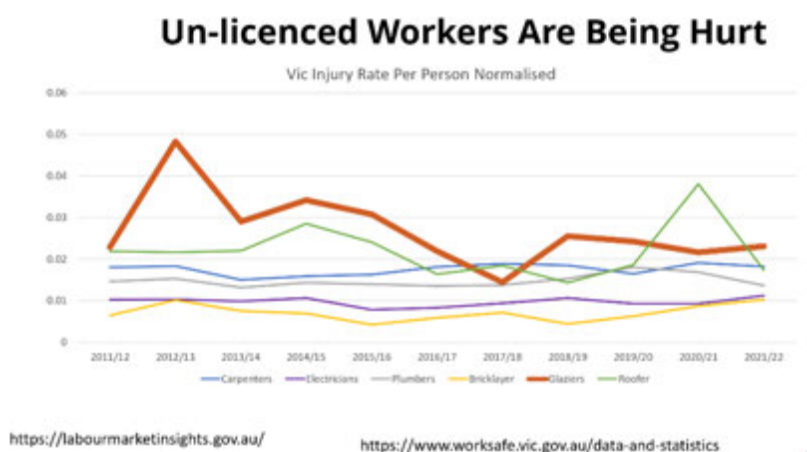
In a modern labour market, which recognises broader social objectives, occupational licensing provides important consumer confidence and protection from unsafe or ineffective products and services, as well as safeguarding regulatory adherence and compliance. In the building and construction sector, licensing minimises both public and private risks by ensuring that people who perform work which is critical to safety, health, amenity, accessibility, and sustainability have achieved a certain standard of technical skills.

For glazing in particular, licensing acknowledges capacity to manage technically difficult and dangerous material across a range of site locations and building typologies. This work would, if done badly, have the potential to cause significant harm to people or cause costly property damage. Ensuring a standard of technical skills is even more important with the industry increasingly reliant on global sourcing via extensive and complex supply chains.



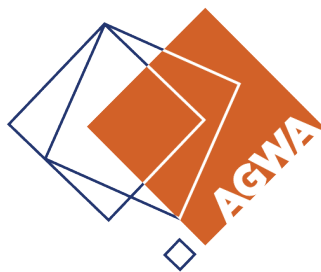
Arguably, licensing underpins productivity by attracting and retaining a more focused individual to their occupation or trade, as well as reducing the cost and time associated with reworking unacceptable work completed initially by unqualified workers. AGWA supports a robust and nationally consistent licensing system that provides consumer protection and strengthening of the current licensing system.

Our industry workers and most importantly, the public, are continually exposed to risk from illegal and unsafe glazing practices. As shown in the data below, unlicensed glaziers experience the highest level of workplace injury, exceeding other trades such as carpentry, roofing, plumbing, electrical, and bricklaying.



An uncomfortably high number of workers who call themselves glaziers continue to carry out glass installations that do not meet the required building standards. In spite of the danger to life and serious injury that results from unsafe and illegal glazing, the community is exposed to operators who have no knowledge of the National Construction Code (NCC) nor any of the relevant Australian Standards AS/NZS 2208, AS 4666, AS/NZS 4667, AS/NZS 1170.2, AS 4055, AS 2047 and AS 1288 that are called up by the NCC.

Despite the dangers involved and the expertise required to glaze in accordance with legal requirements, there are often no obligations or pre-conditions in many Australian jurisdictions for anyone to call themselves a glazier and to advertise for work. The lived experience is all too often that people without the appropriate tools or knowledge of the national building code, state variations and the glazing standards, can still work and call themselves a glazier. This is without considering any lack of public liability insurance, professional indemnity insurance or knowledge of the many complex practices required in glazing.



According to Jobs and Skills Australia, only 56.1% of glaziers have undertaken training, despite the markedly high levels of training in Queensland and New South Wales. Nonetheless, the broader lack of skilled glaziers and likely other trades and professions due to inconsistent national frameworks would be a clear negative drain on glazing work and more broadly construction industry productivity.

AGWA believes this review should come out in support of a national framework for glazier licenses, as well as recommending the adoption of minor glazier licenses supported by skill set (micro credentialling) trade training pathways for works such as shower screens and window retrofit installation. This would not only help with increasing consumer protection, safety, and productivity through being trained appropriately to do the job, but it would also support compliant skilled labour mobility with positive impacts on the long training gap that has been identified by Jobs and Skills Australia.

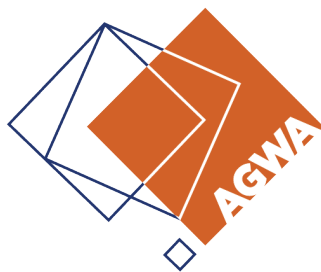
- **International standards**

Members of AGWA's technical team are active in the development of NCC reference standards, including headline standards such as *AS 2047 Windows and external glazed doors in buildings*, *AS 1288 Glass in buildings - Selection and installation*, *AS 4055 Wind loads for housing*. In addition, AGWA also provides technical input to fifteen technical committees that support twenty-eight standards.

In the context of the Australian standards process, it is specifically designed through a consultation framework that allows for consideration of the impact and implications of one standard on another. By universally allowing the adoption of international standards without understanding the context of their reciprocal partner standards, there is significant risk of one element being adopted using one methodology and the other not being compatible as the aligned parties are not represented in the process. When any pathway can be adopted, you risk creating unforeseen defects in building product design, selection, and installation.

A relevant example of the need for Australian specific standards is the Australian standard for safety glass (AS 2208) which aligns with our climatic conditions. If you apply the European standard and the processes required for toughening European glass, noting Australia's climate is so much hotter than Europe, the way safety glass is created is markedly different in relation to the quench and heat cycles. This leads to an inability to meet the performance requirements in a meaningful way.





Access to and cost of standards is already an issue across the building and construction industry more broadly. By increasing the number of applicable standards without a translation through a performance solution, the cost and compliance pathways are multiplied substantially, impacting significantly on all those who design, undertake and certify work as they seek to access and understand multiple complex and potential competing or incompatible compliance pathways.

The Australian standards process is effective at consultative engagement. However, when it comes to Australia's representation on international standards, it is usually only a single person with a limited voice. Whilst there is a consensus view with the Australian standards process, on the international stage this is syndicated to one person's representation in the industry, often at times and locations which is not conducive to Australia's interests being well represented. As difficult as it is to align perspectives and thoughts of stakeholders in Australia, this is even more so in the global context. By default, addressing issues that are pertinent to Australia, particularly with our varied climatic conditions, are very difficult when overseas counterparts do not experience these conditions, are not aware of them or do not see them as a priority. Potentially by watering down the role of Australian standards we reduce our representation, increase the cost of compliance, and are not able to address in a timely manner when amendments are identified.

Where possible, Australian standards seek to align with international standards, but they are prepared and written to meet local performance characteristics. This is especially important to produce resilient buildings given the extensive climate variability of a country as large and climatically diverse as Australia. Importantly, it should be noted that overseas standards are permissible via a performance solution.

Australia's current regime of national standards is fit for purpose, reflects local conditions, and is aligned with regulatory and industry needs. Conversely, international standards are developed in different legal, environmental and policy contexts. Adopting them automatically could see Australia ceding sovereign right to assess what is in the best interest of our economy, environment, and safety systems. As instruments of geopolitical influence, Australia must maintain its ability to contribute, shape, and selectively adopt global standards that align with our national interest.

It is crucial that overseas standards must meet the same transparency, consultation, and scrutiny as standards developed or adopted through Standards Australia committees. Australia already has a strong rate of international standards adoption following an assessment of their appropriateness for local conditions, safety, and quality requirements.



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If overseas-developed standards are allowed into local regulation without equivalent governance or review, it creates a two-tiered system that favours speed over scrutiny, and undermines trust in the regulatory process, and places quality and the safety of Australians at risk.

AGWA's position is that national alignment and harmonisation of regulated standards across states and territories should be the priority, rather than overlaying international standards into an already well-established regulatory framework. It is important to note that international standards can, in some cases, be used as a performance solution under the National Construction Code, however that process requires a suitably qualified person to outline how and why these overseas standards are able to meet the Australian performance requirements. If this review were to lead to the potential for basket of alternate standards' to be adopted it is highly likely that compliance, quality and transparency in a building environment would be undermined as certifiers who are already struggling to cover off on the compliance requirements of the existing referenced standards seek to access, pay for and determine the application and integration of a range of new technical documents.

Do not hesitate to contact me directly at the AGWA office should the Commission wish to seek further information or clarification.

Yours sincerely,

Clinton Skeoch

Chief Executive Officer