

6 June 2025

Ms Danielle Wood
Chair, Productivity Commission
Locked Bag 2, Collins St East
Melbourne VIC 8003

Online submission: www.pc.gov.au/inquiries/current/competition-analysis-2025

Dear Ms Wood,

Productivity Commission – National Competition Policy Analysis 2025

The Chamber of Minerals and Energy of Western Australia (CME) is the peak representative body for the resources sector in Western Australia. CME is funded by member companies responsible for 24 per cent of Australia's company tax receipts in 2023-24.¹

In 2023-24, the WA resources sector accounted for 56 per cent of resources exports,² 52 per cent of resources capital expenditure³ and 51 per cent of resources employment in Australia.⁴

Overview

Productivity growth is the predominant driver of higher living standards for Australians. The more goods and services a society can produce with a given set of inputs (i.e. higher productivity), the greater the material standard of living of that society.⁵

It is therefore no surprise that Australia's resources sector is one of the highest productivity sectors of the economy⁶ and also one of the largest contributors to our nation's standard of living, generating highly skilled and highly paid jobs and contributing significantly to the provision of public goods and services such as roads, health, education and police via its payments to state and federal governments. With regards to jobs, average weekly earnings in the resources sector are 57 per cent higher than the national average,⁷ while the WA resources sector alone directly and indirectly supported 5 per cent of national employment in 2022-23.⁸ In terms of public goods and services, the national resources industry is estimated to have paid \$356.6 billion in company tax and royalties in the decade to 2022-23,⁹ while the WA resources sector contributed around one third of the WA Government's general revenue in 2023-24.¹⁰

CME and its members recognise the critical importance of improving Australia's productivity growth to remain competitive in global markets. As such, we appreciate the opportunity to provide feedback regarding reforms to occupational licensing for electrical trades and the importance of aligned national and international standards to promote productivity growth.

¹ Excludes fringe benefits tax, petroleum resource rent tax and fuel excise duty. CME, [2023-24 Economic Contribution: Australia](#), March 2025; Commonwealth of Australia, [Final Budget Outcome 2023-24](#), The Treasury, 30 September 2024, Note 3: Taxation revenue by type, p 38.

² Government of Western Australia, [2023-24 Economic Indicators Resource Data File](#), Department of Energy, Mines, Industry Regulation and Safety, 29 October 2024.

³ Investment refers to capital expenditure as measured by gross fixed capital formation, current prices. Australian Bureau of Statistics, [5220 Australian National Accounts: State Accounts](#), Table 25. Australian Bureau of Statistics, [5206 Australian National Accounts: National Income, Expenditure and Product](#), Table 34.

⁴ Australian Bureau of Statistics, [6291 Labour Force, Australia, Detailed](#), Table 5.

⁵ Productivity Commission, [Australia's productivity performance](#), accessed 8 January 2025.

⁶ Business Council of Australia, [Australia's flagging competitiveness and productivity](#), 19 November 2024, p 29. Productivity Commission, [Trade and Assistance Review 2022-23](#), 24 July 2024, pp 31-32.

⁷ ABS, [Average weekly earnings, Australia – May 2024](#), August 2024 release.

⁸ CME, [2022-23 Economic Contribution Factsheet – Australia](#), 17 March 2024.

⁹ Minerals Council of Australia, [Royalty and Company Tax Payments](#), 21 May 2024.

¹⁰ CME, [2023-24 Economic Contribution Factsheet – Western Australia](#), March 2025.



Electrical Trades

CME's 2025-26 WA Pre-Budget Submission¹¹ highlighted that adjustments to our education and licensing systems are needed to develop the workforce required to deliver the state's decarbonisation and strategic industry ambitions. To reduce the time and re-training burden for individuals and employers alike, Vocational Educational and Training (VET) providers and universities need to recognise transferrable skills already acquired by mid-career professionals in other sectors wanting to transition to new roles, particularly those related to decarbonisation. This includes providing credit transfers and recognising prior learning in an agreed and consistent manner.

In electrical trades, CME members highlight examples where their employees, such as tradespeople, are considering cross-skilling to become electricians, but a lack of 'core and common' units from other Certificate III trade qualifications that can be credited to an electrical apprenticeship act as a barrier, requiring experienced tradespeople to undergo a full apprenticeship again. This is an unproductive use of resources and constrains both decarbonisation and industry development efforts.

Other examples include WA's Restricted Electrical Licence for hybrid electric and battery electric mobile mining equipment, which specifically references an original equipment manufacturer training course rather than a certified qualification. The high-volume, repetitive task of connecting solar panels requires a higher qualification (A grade electrician) than a Restricted Electrical Licence holder, reducing productivity by taking more qualified electricians away from higher value-adding tasks.

CME is advocating for the modernisation and expansion of the electrical licensing options available for clean energy jobs to support faster growth of this critical workforce. To boost productivity, harmonising regulations in electrical trades can reduce regulatory and administrative barriers to worker mobility, resulting in increased efficiency and economic output. This will also facilitate better matching of skilled workers to jobs.

The Commonwealth announced a national licensing scheme for electrical trades¹² in March 2025 through the National Competition Policy (NCP) framework. If this is based on standard levels of competence that are appropriate to the relevant risk, this could boost productivity by enabling electrical trades to work across state and territory borders without reapplying for a separate license or additional fees. This will also boost productivity by encouraging labour mobility within sectors where it is needed the most such as housing construction and clean energy.

Product Certification Standards

Nationally and internationally aligned product certifications, especially related to decarbonisation and emerging green industries, are critical to ensuring robust market development and transparent price discovery, while also fostering innovation and facilitating trade and market access for WA producers.

In particular, CME has called for the development of clear and robust standards and certification schemes to ensure the sustainable, productive and effective development of a green iron industry in Australia. CME's 2024 Green Iron report calls for:¹³

- International alignment of definitions and methodologies to measure emissions reductions in green steel and iron production. These definitions should recognise the diversity of ironmaking decarbonisation pathways.
- The alignment of Australia's Sustainable Finance Taxonomy with global transition frameworks and excluding Scope 3 emissions for iron ore producers.
- The expansion of the Guarantee of Origin Scheme to green iron products and ensuring recognition in critical offtake markets.

CME has also previously advocated for standards for low-carbon hydrogen¹⁴ (and derivatives) to be aligned with international standards, such as Japan, S. Korea, the US, UK and EU. This will unlock global markets that Australia is well positioned to export into, including electrolytic hydrogen powered by renewable electricity, but also CCUS-enabled hydrogen, which many jurisdictions see as key to

¹¹ CME, [WA Pre Budget Submission](#), October 2024

¹² Federal Treasury, [National licensing for electrical trades](#), 23 March 2025

¹³ CME, [Realising WA's Green Iron Potential](#), December 2024.

¹⁴ CME [Submission on National Hydrogen Strategy](#), August 2023



stimulating at-scale demand while the costs of renewable hydrogen come down in the medium term. This includes alignment of Australia's Sustainable Finance Taxonomy.

Similarly, with regard to low-carbon liquid fuels (LCLF), CME supports emissions and sustainability criteria that is aligned with international standards.¹⁵ Aligning LCLF sustainability criteria with the existing International Sustainability and Carbon Certification (ISCC) requirements for Australian farmers may assist in gaining access to EU markets.¹⁶ However, it will be important to ensure that the application of standards is proportionate and does not unduly increase administrative burdens and audit requirements on suppliers and traders, who are often small-scale, which could hinder growth of the LCLF sector.

Adoption of International Standards

CME advocates for consideration on a case-by-case basis to determine suitability of each initiative or standard within the Australian context. This suitability assessment should take into account local regulatory frameworks, industry needs and operational environments. This approach allows for tailored implementation that supports both national priorities and international compatibility.

Once again, CME appreciates the opportunity to engage with you on this matter.

Should you have any questions regarding this submission, please contact Anita Logiudice, Assistant Director – Policy and Advocacy,

Yours sincerely,

Brooke Fowles

Acting Director – Policy and Advocacy

¹⁵ CME, [Submission to Future Made in Australia: Unlocking Australia's Low Carbon Liquid Fuels Opportunity consultation](#), 17 July 2024.

¹⁶ Sustainable Grain Australia, [Program Overview](#), accessed 30 May 2025.