

Friday, 6 June 2025

National Competition Policy Analysis 2025
Submission from Fire Protection Association Australia (FPA Australia)

Executive Summary

FPA Australia welcomes the opportunity to contribute to the Productivity Commission's review of National Competition Policy.

As the peak national body for the fire protection industry, FPA Australia supports reforms that enhance competition and productivity, but we emphasise the importance of safety, professionalism and regulatory integrity. This is particularly important in high-risk sectors, such as fire protection.

We urge caution when implementing reforms that could unintentionally lower competency standards. Our submission focuses on occupational licensing, the use of international standards, and competition-enhancing reforms that promote trust, quality and sector viability.

About FPA Australia

FPA Australia is the national peak body for fire safety and the fire protection industry. We are a not-for-profit organisation and charitable institution that seeks to improve community safety, with members drawn from some of the leading companies and organisations in fire protection. We provide information, services, accreditation and education to the fire protection sector and the broader community, advocating for a better skilled and more professional industry that minimises the risks and impacts of fire on people, property, and the environment.

Response to identified reform areas

1. Occupational licensing reform

FPA Australia supports occupational licensing reform on the condition that it preserves safety and quality.

We support a harmonised and nationally mobile occupational licensing and accreditation scheme on the condition that it:

- Maintains or strengthens minimum competency standards
- Integrates with existing accreditation schemes, such as the Fire Protection Accreditation Scheme (FPAS), and does not bypass or duplicates them
- Reflects the high-risk nature of fire protection work, which directly affects community safety.

Occupational licensing reform must not dilute standards to achieve harmonisation. FPAS has proven effective in delivering public accountability and sector professionalism. It should be retained or integrated. A national model should build upon mutual recognition and not replace it with a weaker regime.

On previous scheme failures

The National Occupational Licensing Scheme (NOLS) faded due to poor stakeholder engagement and lack of industry confidence in weakened standards. In order for a new approach to be successful, it must be led by the industry and recognised by the government—not the reverse.

Recommendations

FPA Australia makes the following recommendations for occupational licensing reform:

- Treat high-risk trades, including fire protection, as a special class within any new scheme.
- Undertake a robust transition framework that protects existing qualifications and accreditations.
- Involve industry representatives early in the policy design process to ensure practical implementation and sector uptake.

2. International standards

FPA Australia supports the adoption of international standards where they demonstrate equivalency with Australian standards and improve industry efficiencies, innovation and economies of scale.

We oppose the adoption of international standards where they compromise the practices and safety of our local industry, and do not account for the specificities of the Australian environment.

FPA Australia cautions against wholesale adoption of international standards and urges continued protections for Australia-specific risks and conditions.

Industry-driven standard-setting is central to Australia's capacity to uphold safety, quality and context-specific regulation. Reform should strengthen and not diminish the role of Australian experts in shaping standards that reflect our unique built environment and risk profile.

In this context, we must prioritise greater alignment between states and territories before shifting focus to international harmonisation. Inconsistencies across jurisdictions often create more significant inefficiencies than divergence from global norms, and resolving internal issues needs to be the first step in any harmonisation agenda.

Opportunities

FPA Australia believes that the adoption of international standards could:

- Reduce the compliance burden for local manufacturers and importers where equivalent standards already exist.

This means if an imported fire protection product has already been tested and certified to an international standard that is functionally equivalent to an Australian standard, then regulators should avoid duplicating testing or certification.

This would reduce costs, delays and red tape for manufacturers and importers, especially those bringing in compliant products already approved in jurisdictions with similarly high standards, such as the European Union and the United States.

Adopting international standards could also:

- Streamline conformity assessments for lower-risk products.

This means that for products or components posing minimal safety risks, the approval or certification process should be simplified. This might include accepting self-declarations of conformity or mutual recognition agreements rather than requiring expensive third-party testing.

Cautions

FPA Australia highlights the following risks to international standards:

- Fire protection standards are highly contextual and varied, which means that Australian bushfire risk, lithium-ion battery fires, and local climatic and construction conditions are not adequately covered by many international standards.
- Access to international standards is often restricted, costly and blocked by paywalls. This poses challenges to small and medium enterprises and regulators alike.

Recommendations

FPA Australia makes the following recommendations for international standards:

- Maintain Australian-specific standards in high-risk areas, such as AS 1851, bushfire-prone construction and essential fire safety measures.
- Mandate free public access to any international standards adopted by law.
- Ensure stakeholder participation in the planning stages for adoption of international standards.

3. Other competition reform options

FPA Australia recommends that competition reforms:

- Enhance enforcement against unqualified or non-compliant operators, as true competition requires a level playing field
- Address procurement policy reform to reward accredited, compliant providers—not only the least expensive
- Promote industry-led accreditation as a mechanism for both quality assurance and competition, particularly in regulated industries.

Broader reform opportunities

FPA Australia identifies additional reforms as follows:

- Develop a central register of compliant practitioners across all jurisdictions.
- Support transition incentives for businesses that invest in training, safety and accreditation.

Conclusion

FPA Australia supports competition reforms that drive innovation and reduce inefficiencies on the condition that they do not undermine safety, quality or workforce professionalism.

We are ready to assist the Commission in modelling, consultation and the design of implementation frameworks that preserve public confidence in our sector and safeguard the community. We welcome the opportunity to further contribute via roundtables or as a technical resource.

John Collie

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