

Productivity Commission's National Competition Policy Analysis 2025 Call for Submissions—RSHQ Submission

Introduction

Resources Safety and Health Queensland (RSHQ) welcomes the opportunity to contribute to the **Productivity Commission's National Competition Policy Analysis 2025 Call for Submissions**. As Queensland's independent regulator for worker safety and health in mining, quarrying, petroleum, gas, and explosives industries, RSHQ plays a critical role in ensuring compliance, protecting communities, and maintaining high safety standards.

This submission provides RSHQ's perspective on occupational licensing and international standards harmonisation, key issues under review in the study. Given the high-risk nature of the industries regulated by RSHQ, maintaining stringent licensing and certification processes is essential. Similarly, while international standards can provide structural benefits, harmonisation should be applied selectively, ensuring regulatory frameworks remain tailored to Queensland's unique conditions and safety priorities.

Key issues

Below is RSHQ's feedback on the key issues under the study.

Occupation licensing

RSHQ applies mutual recognition (MR) where appropriate; however, due to stringent security requirements and the high-risk nature of the industries it regulates, automatic mutual recognition (AMR) is not suitable in all cases.

For example, gas work—which is as high-risk area—must be licensed to ensure safety and compliance. Queensland has chosen MR over AMR to uphold regulatory standards. The current practice of MR applied in Queensland for the trade and occupational licensing for gas work allows interstate practitioners to work in a way that ensures work carried out meets the expectations of the regulator and the Queensland public. A similar approach is taken with explosives occupational authorities, which are excluded from the AMR agreement due to jurisdictional differences and critical safety concerns.

The same principle applies to Board of Examiners certificates. Certain licences, such as Site Senior Executive (SSE) Notices and Ventilation Officer Certificates, are not covered under AMR due to variations in qualifications and role scope across jurisdictions.

RSHQ considers its current approach to occupational licensing appropriate for the industries it regulates and does not see a need for any changes at this time.

International Standards

RSHQ is of the view that Australian standards differ due to local regulations, industry needs, environmental conditions, and workplace safety considerations, and harmonisation with international standards may not be appropriate in every instance. For example, some explosive/hazardous area equipment standards (e.g., 60079 series for Explosion Protection Electrical Equipment) are harmonised, but others remain unique to Australia's specific requirements.

There are differences between international standards and national standards, which also need to be considered. For example, licensing and permits in the explosives industry, are about ensuring safety which requires engaging with applicants to tailor a licence specific to the activities the applicant will be undertaking. In this environment, international standards provide structural outcomes but can lead to variation due to interpretation. National standards tend to be more nuanced, incorporating lessons learned from local incidents and are more likely to benefit the industry.

Similarly, in the electrical mining environment, standards are considered on a case-by-case basis. Automatic adoption of international standards could reduce safety in Australian coal mines. For example, the adoption of an international standard for explosion-protected diesel engines could lead to increased development costs, delays, and would require legislative changes.

In the area of design techniques to minimise the probability of explosions or to mitigate the extent of the damage, there are instances where international standards are required to keep pace with technological advances in related industries. When gaps in these standards arise, regulatory requirements are implemented, sometimes requiring the introduction of supplementary Australian Standards or the adaptation of international standards to better suit national needs.

Recommendations

RSHQ recommends maintaining the current approach to occupational licensing, ensuring MR is applied where appropriate while AMR needs consideration for the specific high-risk industries. Given the stringent security and regulatory requirements in gas work, explosives occupational authorities, and Board of Examiners certificates, AMR is generally not suitable. Queensland's established MR framework effectively upholds safety and compliance standards, and no changes are needed at this time.

Regarding international standards, RSHQ supports harmonisation only where it enhances safety and aligns with Australian industry conditions. Full automatic adoption of international standards is not advisable, as it may overlook local regulatory needs and workplace safety considerations. Standards should continue to be reviewed on a case-by-case basis, ensuring that lessons from Australian industry practices—particularly in electrical mining and explosives licensing—are incorporated into national regulations.

Conclusion

RSHQ remains committed to its role as an independent regulator ensuring the safety and health of workers in Queensland's mining, quarrying, petroleum, gas, and explosives industries. This submission outlines RSHQ's position on the key issues under the study, reaffirming the importance of maintaining a targeted approach to occupational licensing through MR rather than AMR for high-risk industries.

Similarly, RSHQ supports selective harmonisation of international standards where it enhances safety and aligns with Australian regulatory requirements. However, automatic adoption of international standards may overlook local industry needs and safety considerations, requiring a case-by-case assessment to ensure standards are appropriate for Queensland's industries.

By continuing to prioritise safety, compliance, and tailored regulation, RSHQ seeks to uphold industry best practices while maintaining robust protections for workers and communities. We appreciate the opportunity to contribute to this study and look forward to ongoing discussions that support effective, risk-informed regulatory frameworks.