



**Hon Andrew Fraser MP**  
Member for Mount Coot-tha



**Queensland  
Government**

---

**Treasurer of Queensland**

TRX-07453

**- 5 DEC 2008**

Mr P Laplagne  
Mutual Recognition Review  
Productivity Commission  
LB2 Collins Street East  
MELBOURNE VIC 8003

*Reu M Laplagne,*

Thank you for your letter of 14 November 2008 seeking submissions on the Productivity Commission's draft report on the Review of Mutual Recognition Schemes.

Queensland supports all efforts, both under mutual recognition and the Council of Australian Government's national reform agenda, to enhance productivity, economic efficiency and labour mobility. Queensland is also keen to ensure that appropriate standards, protections and safeguards, as well as sufficient flexibility to provide local responses in exceptional circumstances, such as criminal inquests or unsafe or fatal occupational practices, are maintained.

Queensland raises the following points and concerns for consideration:

Draft Finding 5.1 and Draft Recommendation 5.2

Recognising the increasing use of 'light-handed' regulatory approaches such as co-regulation, de facto and negative licensing, Queensland agrees that it is timely to clarify the potential application of mutual recognition within these frameworks.

Queensland suggests that it would be beneficial to further investigate how mutual recognition would work in practice within 'light-handed' regulatory approaches, particularly where it relates to maintaining the skills and competency of licensees. For example, it may be difficult to ensure a licence holder has the base level skills to competently carry out the work if a licence is not linked to a training outcome or requirement.

Level 9 Executive Building  
100 George Street Brisbane 4000  
GPO Box 611 Brisbane  
Queensland 4001 Australia  
**Telephone +61 7 3224 6900**  
**Facsimile +61 7 3229 0642**  
**Email [treasurer@ministerial.qld.gov.au](mailto:treasurer@ministerial.qld.gov.au)**  
ABN 65 959 415 158

Draft Finding 8.2

Queensland notes the objectives of this draft finding, that is, to expand and clarify the conditions of 'manner of sale of goods' under mutual recognition to improve the efficiency and effectiveness of the scheme and would support further investigation of its application. Queensland also notes that the proposed extensions to mutual recognition of goods would continue to not apply where there is potential for public health and safety risks and/or environmental harm. However, it is important to also ensure that there is sufficient flexibility within the scheme and exemption mechanisms to allow jurisdictions to respond effectively to local issues and conditions.

Draft Findings 10.1 – 10.4

Queensland acknowledges that significant opportunities and benefits result from bilateral engagements. However, Queensland is concerned that the report understates the risks associated with lower quality products or registered persons with lower qualifications entering Australia or New Zealand under the Trans-Tasman Mutual Recognition Arrangement.

Thank you for the opportunity to comment and for your consideration of Queensland's submission. I look forward to receiving the final report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Fraser', with a long horizontal flourish extending to the right.

ANDREW FRASER

---