

Brief comments received

No.	Comment
1	More harmonisation on occupational licenses for trades. Out of scope for the NC review, but a general safety provision similar to Canada is very much needed as part of consumer related reforms to ensure businesses cannot sell dangerous products in the first place.
2	I strongly object to a move to adopt international standards into Australian regulations as a policy step. I co-ordinate a team of experts representing the Human Factors and Ergonomics Society of Australia. They are expert members of a range of committees including areas such as machine guarding, prevention of slip, trip and fall, furniture design, exposure to machine vibration and others. They frequently comment that the research undertaken by their committees results in higher and more comprehensive Standards than the international equivalent. The continuation of the current consultation model with researchers and practitioners who bring practical advice is an essential process for the credibility of the Standards.
3	Falls prevention has become a significant industry, where the elderly are recognised as being at risk of falling. Age-related functional declines are thought to be caused by hallmark biological processes that manifest in physical, mental, and metabolic impairments compromising intrinsic capacity, health span and quality-of-life. Exercise is a multipotent treatment with promise to mitigate most aging hallmarks, but there is substantial variability in individual exercise responsiveness. While we should try to improve such quality of life for as long as patients are prepared to collaborate, there is a wider problem of environmentally-induced slip and fall injuries which have largely become neglected. Workcover authorities provide general guidance but rely on subjective approaches rather than requiring slip resistance measurements when potential hazards are identified. Slip resistance research has largely been abandoned by governments and left to a small number of citizen scientists and small businesses. Many of the slip resistance treatments that are peddled are ineffective on many types of floors. They may be sold to people concerned about the elderly falling, even though comparatively very few elderly falls are due to slips. Flooring manufacturers have largely done as little as is necessary to satisfy the widely varying safety expectations (and requirements) in different international domains. Manufacturers often dominate standards committees and may seek to trivialise any compliance requirements. Australian representation on some committees may counter some excesses, but many ISO committees start with CEN standards where there may have been minimal public good input. Many product requirements have been reduced to the lowest common denominator in some standards. Manufacturers often base their recommendations on the ex-factory characteristics, even though these may provide a very poor indication of performance that will occur through the majority of their life cycle. This can be most unfortunate in the case of slip resistance. If we consider the resin bound engineered stone products that have now been banned in Australia, how did such a lapse occur. The products complied with the European Norms which were then used as the starting base for the ISO standards While the proposal may often be sound, there is a need to ensure that each and every “harmonized standard” has been optimized from a public good perspective and that it serves the Australian national benefit. It would be sheer folly to accept and adopt deficient documents for Australian use. There must be a process of due diligence that may benefit from an associated degree of accountability and liability.

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4	Information request 1 Having regard to government policies to reduce the cost of housing and promote increased supply, focusing on occupations in the building and construction sector could be considered a priority, but from past initiatives, could also be regarded as well-suited to a national licensing scheme. Such an approach would increase mobility, streamline mutual recognition and help guard against inferior quality buildings in the quest for quantity. The key occupations and first steps for such a scheme have already been documented in work conducted by the Australian Building Codes Board (ABCB) at the end of 2021 as part of the Building Confidence Report National Implementation Plan, in the form of a National registration Framework for 16 disciplines: National Registration Framework There will no doubt be many reasons why attempts at a national licensing scheme have not succeeded in the past, which apart from the obvious problems around the appetite of the states and territories to collaborate and compromise, the National Occupational Licensing Scheme was overly complicated. Quantification of some of the benefits can be found in a CIE macro-economic analysis conducted at the time: Building Confidence Report - A Case for intervention Information request 2 An opportunity exists to increase recognition and acceptance of reputable overseas standards used in the evaluation and certification of building and construction products. This needs to be conducted with a range of safeguards in place to avoid sub-standard or fraudulent products entering the market that are not fit for purpose, but with appropriate criteria, this has the potential to diversify and expand supply changes, increase competition and reduce the cost of building materials and products. In this circumstance, standards may not necessarily represent the universally accepted understanding of a document developed by a recognised Standards Development Organisation but could include what are often referred to as technical specifications. Key, however, is the status and reputation of the organisation and the processes it follows in the development of the document, particularly when used for normative purposes. Another safeguard is to require the application of such international instruments to be applied through independent third-party evaluation, which can be achieved by requiring their application under accredited product certification schemes by accredited conformity bodies, employing digital conformance protocols that include an examination of a product's fitness for purpose against local requirements, which would include comparison to any established referenced standard. Alternatively, the National Construction Code (NCC) could contain a schedule of recognised international standards for categories of products. In the absence of this or similar type of arrangement, the costs for international manufacturers to export product to Australia can act as a disincentive due to the need to retest and recertify products, and in some cases potentially modify products in order to satisfy unique requirements for this market. Where there is justified need for different requirements, these can be considered as part of any comparative analysis. The New Zealand Government is in the process of implementing such an arrangement through the Building (Overseas Building Products, Standards, and Certification Schemes) Amendment Bill - Using overseas building products set to be easier Building Performance Although the methodology being employed has the potential to be improved and simplified, this initiative points to consideration of a similar approach for Australia. There would need to be reforms made to both Australia's standards and conformance infrastructure, with an emphasis on JASANZ, and measures incorporated in State and Territory regulations and the NCC to support access to reputable and appropriate international documents.
5	The Association of Wall & Ceiling Industries of NSW represents the Wall & Ceiling Industry (Plasterers, gyprockers). Our organisation totally resists an amalgamation of standards due to the following reasons: USA & European building processes and construction requirements differ greatly to Australia. USA completely brace ALL framing (roof & walls) USA do not use trussed roof frames (which is designed to deflect) and as such use a screw only method (no screw / glue) combination. USA / Europe also use more level 5 finish or texture (popcorn) finish as they don't have 6mtr sheets (more butt joins). USA / Europe also have a greater external thermal barrier requirement especially with commercial construction due to "freeze / thaw" issues of their climate. The above reasons are just a few examples of why only Australian Standards should be accepted.

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6	Woman here. We are 51% of the voter population. Productivity Reform/Red Tape Reduction: - 1. Remove the Moving to Area of Lower Employment Prospects (MALEP) policy (Social Security Legislation) so whether it's for affordable rental stock or to be closer to Elderly parents for caring, the MALEP financially punishes women for moving. 2. Remove the Partner Income Test for women so they can have a relationship while unemployed or underemployed. As you know, if they do, they are removed completely from the Welfare Safety Net. It would be a mental health reform as it is an economic reform and returns women into our Australian Constitution (Social Security Legislation). 3. Sole Traders and Small Businesses in the AI era for women are being blocked by Landlords, ATO and red tape. Women are renters and taxpayers, yet we are making it almost impossible to have a home business as job creators. This does not make sense in the AI era where women are losing foothold on job market (ABS). Thank you for this opportunity. I hope women will be acknowledged as tax payers in every way our Australian Constitution does not see us. Currently we are read as Widows and Child Endowment. We are taxpayers, renters, home owners, investors, citizens and deserve access to everything refugees, migrants and visa holders can access. I'm confident the Productivity Commission will understand my submission. When in Parliament House, peak bodies gave me a tin ear on topic. I ask you to push again. This is 2025 not 1901. We are not a chattel to men. Yet we are when you look at those 3 dot points.
7	It is absurd that hairdressers have to have a license. It's a blatant form of rent seeking. Anyone can cut hair - they may do so poorly, but that should be reflected through market forces, not some government-backed title.