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Competition and Consumer Division
The Treasury
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via email: nationalcompetitionpolicy@treasury.gov.au

To Whom It May Concern,

Review of Australia's Mutual Recognition Schemes for Workers

Standards Australia welcomes the opportunity to contribute to the Review of Australia's Mutual Recognition Schemes for Workers. As Australia's peak national standards body, Standards Australia develops and maintains nationally harmonised standards that underpin safety, quality, interoperability and productivity across the Australian economy.

This role is particularly relevant to occupations subject to licensing and registration requirements, where technical standards are intrinsically linked to public safety outcomes, consumer confidence and workforce competence.

Standards Australia supports mutual recognition schemes that promote national consistency. However, as outlined in our September 2025 submission to the Competition Taskforce on *national licensing for electrical occupations*, regulatory divergence across state and territory jurisdictions remains. Standards Australia welcomes the National Competition Council's review, including how mutual recognition schemes interact with standards and where further reform could improve consistency, mobility and productivity outcomes.

National Standards

As Australia's representative to the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), Standards Australia plays a key role in facilitating the development and adoption of internationally aligned standards. All standards developed or endorsed by Standards Australia are designed to be nationally harmonised, to support consistent application across all Australian jurisdictions. These standards are not state-specific; rather, they provide a unified technical framework that supports safety, quality, and interoperability nationwide.

Standards Australia considers that misalignment between licensing frameworks and nationally harmonised Australian Standards can lead to duplicated compliance efforts, increased costs and delays in project delivery.

Automatic Mutual Recognition (ARM) Scheme v National Licensing Framework

Standards Australia welcomed National Cabinet's signing of the Intergovernmental Agreement on ARM in 2020, enabling licensed workers to undertake equivalent occupations across jurisdictions without the need for additional assessment of their qualifications, skills or experience. Mutual recognition has supported workforce participation, addressed skills shortages and has contributed to productivity gains, which is critical to housing delivery, infrastructure investment and the energy transition.

While AMR has generally worked well, its implementation has been uneven across jurisdictions. Variations in licence categories, requirements and notification processes has created uncertainty for workers seeking to operate interstate.

Standards Australia supports a national occupational licensing framework to address the persistent regulatory divergence across state jurisdictions. A national framework could deliver the objectives of mobility, safety and efficiency more effectively than mutual recognition alone. Greater consistency in both licensing requirements and regulation will strengthen alignment with Australian Standards and best practice to ensure public safety, consumer confidence and technical integrity.

As outlined in SA's 2025 submission on *national licensing for electrical occupations*, a national licence:

- Aligns naturally with nationally harmonised Australian Standards
- Reduces regulatory fragmentation
- Improves workforce mobility
- Enhances safety and compliance certainty
- Supports national priorities in housing, infrastructure and energy transition

Standards Australia supports a hybrid framework, where mutual recognition is strengthened in the short term while national licensing is progressively implemented in high-priority occupations.

Improved systems and processes to support increased efficiency

Embracing use of modern technologies will enhance scheme usability. To achieve this, Standards Australia supports development of a national digital licensing register that incorporates standards references, facilitates real-time updates to requirements and improves regulatory oversight.

Standards Australia is working closely with peak industry bodies on a proposed tripartite initiative to improve access to and usability of Australian Standards. The first stage of this initiative would deliver digital read-only access to mandated standards, while the second stage would establish a 'Standards Hub' that leverages emerging technologies to provide interpretive tools and standards aligned training platforms for practitioners. This hub would ensure that those delivering critical services are equipped with the practical resources needed to meet regulatory requirements, uphold public safety and support industry excellence. Together, these systems and technologies can strengthen existing ARM schemes and support a smooth transition toward a national licensing framework.

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Conclusion

While Australian Standards are already nationally harmonised, their interaction with licensing and registration frameworks is not. Inconsistent legislative and regulatory adoption of standards makes it harder for workers to rely on a single, authoritative technical framework when working across borders. For this reason, Standards Australia has strongly supported the AMR framework, which has helped reduce costs and regulatory burden for licensed workers. However, ongoing regulatory divergence between states and territories continues to limit the full benefits of mutual recognition. A national occupational licensing framework could more effectively achieve the objectives of AMR and boost productivity across key sectors.

Standards Australia considers stronger alignment between licensing regimes and nationally harmonised Australian Standards to be essential to effective mutual recognition.

Yours sincerely,



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