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Chamber of Commerce  
and Industry WA

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T: (08) 9365 7555

E: [membership@cciwa.com](mailto:membership@cciwa.com)

W: [www.cciwa.com](http://www.cciwa.com)

Mr Marcus Bezzi  
President  
National Competition Council  
GPO Box 250  
MELBOURNE VIC 3001

*Via email: [NationalCompetitionPolicy@treasury.gov.au](mailto:NationalCompetitionPolicy@treasury.gov.au)*

Dear Mr Bezzi

## **Submission to the NCC review of Australia's Mutual Recognition Scheme for Workers**

The Chamber of Commerce and Industry WA (CCIWA) is a member-based organisation with more than 7,000 members, spanning every sector of the economy, every size of business, and every region across our state. We are committed to developing public policy options that makes WA the best place to live and do business.

CCIWA welcomes the opportunity to provide a submission to the review of Australia's mutual recognition scheme for the National Competition Council (NCC). Our submission should be read in conjunction with Australian Chamber of Commerce and Industry's submission, which we support in full.

From the outset, CCIWA supports any reform that will improve labour mobility and productivity in Australia through the removal of unnecessary regulatory duplication in the occupational licensing system.

CCIWA recommends the default position of the NCC should be that within the Federation, labour mobility should be unencumbered without a genuine public interest in doing so.

While we acknowledge licensing serves legitimate regulatory purposes, for example, by protecting consumers from unqualified practitioners, maintaining professional standards, and managing risk in fields where incompetent work can cause harm.

Unfortunately, however, in Australia and across jurisdictions, our occupational licensing architecture has drifted substantially from those founding purposes and serves as a barrier to restrict the supply of skilled tradespersons across State and Territory borders.

About one in every five workers in Australia currently face occupational entry regulations, which can worsen labour shortages, without protecting consumers and the quality of the work provided.<sup>i</sup>

As a result, this not only restricts new entrants from entering markets, but it also impacts the application of technology within businesses, due to more stringent applications of occupational licensing and its interpretation.

While Automatic Mutual Recognition (AMR) has been a positive and necessary reform, it is hampered from delivering the gains often discussed. This is due to the issues that plague occupational licensing itself, specifically, its uneven implementation, and a lack of universal application by jurisdictions.

To this end, CCIWA recommends the focus of the NCC should be to strengthen and expand the implementation of AMR. To ensure the AMR meets its objectives related to productivity and competition, three current barriers must be addressed, namely:

- all States and Territories must be signatories. At present, Queensland is not a signatory to the AMR, restricting the full realisation of economic benefits. There should also be consideration of the alignment between the AMR and the Trans-Tasman Mutual Recognition Arrangement, including the development of standardised disclosure documents for overseas trained workers.
- there must be consistency in terminology and occupations across jurisdictions. At present, there is inconsistency, making the AMR difficult to navigate without support. **Appendix 1** outlines the variance in trade recognition settings across the States and Territories; and
- there must be incentives in place for all States and Territories to address the two former points. At present, there is no incentive for States and Territories to harmonise, which makes the AMR inefficient and ineffective at times.

In addition, AMR must be genuinely automatic as the name implies. The carve-outs and exclusions that dilute the AMR framework should be progressively eliminated, with jurisdictions required to demonstrate compelling public interest justification for any occupation-specific exclusion.

Despite this, we hold the view that Government should continue with AMR, rather than a national licensing system. If a national licensing framework is progressed, then we suggest that dual licensing should be maintained, allowing businesses and individuals to choose their preferred option, and be co-designed in consultation with industry.

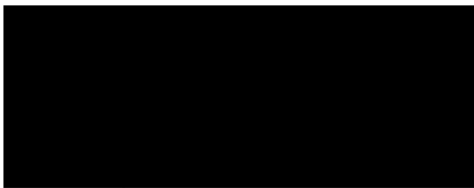
Further, we suggest that National Cabinet's engagement with the labour supply dimensions of the housing and infrastructure pipeline, and how to ensure Australia can build more homes provides a great opportunity for accelerating this reform.

Mutual recognition and AMR have delivered meaningful progress in reducing regulatory duplication within Australia, and in turn has continued to support the free movement of labour across jurisdictions.

This work should be continued, and instead of moving to a one-size-fits-all approach of national licencing, removing the constraints forced upon AMR through fragmentation and inconsistent implementation, would help Australia's declining productivity.

Should you wish to discuss the content of this letter further, please do not hesitate to contact Dr Daniel Kiely, CCIWA Chief Economist, via email at [REDACTED]

Yours sincerely

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Will Golsby  
**Chief Executive Officer**

## Appendix 1: Example of divergent names for same license: Electrician (General and Special Class) eligibility by Jurisdiction<sup>ii</sup>

Jurisdiction	Nomenclature	Requirements
New South Wales	Provisional Tradesperson Certificate	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>12 months supervision by a current electrician with full licence</li> </ul>
Queensland	Restricted electrical work licence/permit	<ul style="list-style-type: none"> <li>Apply to undertake training</li> <li>Enrol with an RTO</li> </ul>
South Australia	Restricted Electrical Worker Registration	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>Be supervised by a current electrician with full licence</li> </ul>
Tasmania	Provisional Licence	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>12 months supervision by a current electrician with full licence</li> </ul>
Victoria	Supervised Workers Licence	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>12 months supervision by a current electrician with full licence</li> <li>Complete the Licensed Electricians Theory (LET) and Licensed Electricians Practical (LEP) assessments</li> </ul>
Western Australia	Electrician's Provisional Licence	<ul style="list-style-type: none"> <li>Apply and receive approval from regulator to attend an Electrical Licensing Board approved RTO</li> <li>Context Gap training</li> <li>Be supervised by a current electrician with full licence</li> <li>Police check</li> </ul>
Australian Capital Territory	Unrestricted Permit Electrotechnology Systems	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>12 months supervision by a current electrician with full licence</li> <li>Letter of need outlining the principal trade to which the incidental work applies and the need for the restricted electrical permit or licence in that trade</li> </ul>
Northern Territory	Electrical work licence trainee permit	<ul style="list-style-type: none"> <li>Context Gap training</li> <li>12 months supervision by a current electrician with full licence</li> </ul>

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<sup>i</sup> Australian Government, Productivity Commission: [Building a skilled and adaptable workforce](#), 10 December 2025.

<sup>ii</sup> Australian Government, Trades Recognition Australia. [Electrician \(General and Special Class\) requirements](#).