

24 July 2015

Mutual Recognition Schemes Review
Productivity Commission
Locked Bag 2
Collins St East
MELBOURNE VIC 8003

By email: mutual.recognition@pc.gov.au

Dear sir/madam

RE: Mutual Recognition Schemes Draft Report

On behalf of the Master Plumbers and Mechanical Services Association of Australia (MPMSAA), I thank you for the opportunity to comment on the Mutual Recognition Schemes Draft Report published by the Productivity Commission in June 2015 and for the earlier opportunity for verbal discussion.

The Association supports the continuance of the Mutual Recognition Scheme for licensing in the plumbing and gasfitting occupations. The system has in the main worked successfully and has facilitated the mobility of plumbing practitioners.

The MPMSAA supports the ability for the registration body to conduct background checks, including police clearance declarations. Applicants should only be able to apply for mutual recognition where they already hold a current license in their home State.

The MPMSAA supports in principal the need for ongoing up-skilling of plumbers and gasfitters as new technologies and skills are required in this ever-developing industry. With the demand for innovation, cost efficiency and environmental protection, plumbing practitioners need to be kept up to date with the necessary information. Consumers demand these solutions to satisfy their needs for improved efficiency from products and technology that are constantly evolving in this continually changing industry. However, at this stage it would be difficult under the scheme to implement and is better left for further consideration at a later review. To our knowledge, other than New Zealand, no other state or territory has a compulsory continuing professional development scheme.

The MPMSAA believes that considerable work on the recognition of the different scopes of work that are licensed in different jurisdictions would be required before a system of automatic mutual recognition would be workable. Much of this work was done in preparation for the National Occupational Licensing Scheme (NOLS) that was abandoned several years ago. It would also create concern that without a requirement to register locally, the capacity of regulators to protect consumers will be undermined. This is because they depend on registration fees to fund enforcement activities, and without a formal registration requirement they will have no knowledge of the people practicing in their jurisdiction.

The MPMSAA supports the view that mutual recognition for plumbers and gasfitters provides:

- Increased opportunities for Australians to work across the country, and for Australians and New Zealanders to work in each other's country;
- Improved cooperation between regulatory authorities;
- Certainty for workers considering moving between jurisdictions;
- Licensing authorities a faster way to consider applications for recognition of equivalent licences; and
- Employers with mobile workforces greater ease to relocate workers more quickly across state and territory borders.

The discussion paper also forwarded a number of options for consideration including:

- Requiring people to reside in the jurisdiction where they first register for a period of say 12 months before seeking registration elsewhere under mutual recognition.
- Attaching additional requirements on service providers from other jurisdictions to protect public health, security or the environment, on the grounds that registration requirements in the person's origin jurisdiction are inadequate.
- Refusing to recognise the qualifications of an individual who undertakes training in one jurisdiction, registers in another jurisdiction and then seeks to have their registration recognised in the jurisdiction where they trained.

The MPMSAA agrees that the first two of these three options are not worth pursuing, as they would add to the cost of administering mutual recognition schemes and hinder the cross-border movement of short-term residents who have a genuine reason for moving. The third option would however in our view provide more confidence in the system in that the perception of jurisdiction shopping would be avoided.

In conclusion, the MPMSAA supports the continuance of the mutual recognition scheme for the plumbing and gasfitting industry, with continual improvements by regulatory authorities to streamline the process wherever possible.

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours sincerely

Ken Gardner
Chief Executive Officer