

Review of Australia's Mutual Recognition Schemes for Workers



**FIRE
INDUSTRY
ALLIANCE**

INTRODUCTION

The Fire Industry Alliance welcomes the opportunity to respond to the National Competition Council's Consultation Paper on the Review of Australia's Mutual Recognition Schemes for Workers. We acknowledge our earlier submission of March 2026 and note that the Council has drawn on it in formulating its interim findings, including in support of Finding 5 concerning inconsistent regulatory frameworks for fire-related trades.

This response builds on that earlier submission without repeating it. The focus of this response is on the Council's interim findings and the new consultation questions, identifying the findings we support, the findings that require qualification, and the specific actions we recommend to the Council in its final report.

The fire protection industry is the invisible guardian of Australia's built environment. Every commercial building, every high-rise apartment, every aged care facility, every hospital depends on fire protection systems designed, installed, maintained, and certified by practitioners whose competence is, quite literally, a matter of life and death. Our position in this Review is grounded in that reality and shaped by our Members experience on the ground.

The Australian Fire Protection Industry

Fire protection in Australia is typically achieved via three means:

- Active fire protection (fire sprinklers, fire hydrants and fire alarm systems);
- Passive fire protection (fire rated walls, floors and ceilings and fire sealing); and
- Education.

The Fire Protection Services industry contributes over \$4.2 billion to the Australian economy every year. Over 2000 businesses pay nearly \$700 million in wages each year and industry revenue is projected to increase at an annualised rate of 1.5% over the five years through 2025-26, to reach \$2.7 billion.

The IBISWorld Industry Report OD5424 Fire Protection Services in Australia (November 2020), claims that despite the presence of vertically integrated multinational giants, the industry has a low level of market share concentration. The two major companies have a combined market share of only 10% and are both part of large multinational companies operating globally across several related industries. Thirty years ago, the two major companies are estimated to have had 80% of the market.

There are numerous regional and local players that construct, install and service fire protection systems to small, medium, and major buildings across the full scope of class 2 to 9 buildings as well as higher risk facilities such as fuel depots, harbours, and similar

developments. Over half the industry enterprises employ between one and 19 people. As the minor players have increased their share of the total market, the industry has become more diverse, while also growing substantially.

Where thirty years ago, the two major companies offered a form of institutionalised but limited “industry” training to their people, it could be argued that the industry was less in need of regulation. However, as the industry has grown substantially and its make-up evolved it is now predominately made up of many more, smaller independent contracting companies. That market growth and diversification has provided customers with better contractor choices, better outcomes, and better pricing but, at the same time, raised the need for more over-arching regulation.

The Fire Industry Alliance

The Fire Industry Alliance is an Australia-wide community of commercial fire protection contractors, their people, suppliers, and industry stakeholders representing a wide and varied membership from the smallest sub-contractor through to large Australia-wide construction and service businesses. Our Members work at the frontline of fire protection with an estimated 80 per cent of the fire protection work undertaken in Australia completed by Members of the Fire Industry Alliance.

The Fire Industry Alliance utilises the resources of other Australian and International industry organisations and associations.

The Fire Industry Alliance is a member of The World Fire Emission Reduction Alliance, signing a Memorandum of Understanding with the Dubai Directorate General for Civil Defence, during the opening ceremony of the World Fire Reduction Emission Alliance at the COP 28 World Climate Conference. The Fire Industry Alliance attended the Conference as specially invited guests of the UAE Government, demonstrating the role Fire Protection plays in the global conversation on climate change. Through the achievement of shared aims, reduction of global emissions from fire can be achieved through effective Fire Protection. The Fire Industry Alliance will continue to work through this alliance to cooperate through the sharing of information and best practice in Fire Prevention and Protection as well as collaboration on education, research, and worldwide awareness to minimise climate change.

The Fire Industry Alliance is committed to the delivery of quality fire protection practitioners across all aspects of fire protection safety. To this end, the Fire Industry Alliance has sponsored and supported the growth of the world leading fire industry Registered Training Organisation, Fire Industry Training (FiT), which now delivers fire industry required training for all of Australia at its campuses in Brisbane, Melbourne, and Sydney.

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The Fire Industry Alliance believes that an appropriate regulatory framework should be one that protects the safety of the community and property, provides adequate consumer protection, recognises, and accommodates industry practice and standards, requires registration of practitioners, and is linked to the national training package framework.

EXECUTIVE SUMMARY

The Fire Industry Alliance's central position is unchanged from our March 2026 submission: mutual recognition will not deliver safe, effective labour mobility in fire protection while the underlying regulatory frameworks remain so fundamentally misaligned across jurisdictions. The fix is not in the recognition machinery — it is national consistency in the frameworks being recognised. Better, not more.

We are encouraged that the Council's interim findings reflect a similar understanding. We particularly endorse:

- **Finding 2** — that AMR's effectiveness is materially limited by occupational exemptions and Queensland's non-participation. Fire protection is one of those exempt occupations.
- **Finding 5** — that mutual recognition works best where there is high regulatory alignment, and that this alignment is absent in fire-related trades and other safety-critical occupations.
- **Finding 8** — that the Ministerial Declarations supporting the MR scheme are out of date and difficult to maintain.
- **Finding 11** — that a national or interoperable digital licensing register would deliver significant benefits.
- **Finding 12** — that stronger institutional arrangements are needed for enduring reform.
- **Finding 13** — that mutual recognition alone cannot address concerns about training quality and fraudulently obtained credentials.
- **Finding 14** — that national licensing may be desirable for occupations meeting specified criteria, and that a graduated approach can build towards it.

We submit that fire protection meets every one of the four criteria the Council identifies in Finding 14 for prioritisation under a national licensing framework. We urge the Council to specifically nominate fire protection as a priority occupation for the national licensing pathway in its final report.

Our recommendations are set out at the end of this submission.

RESPONSE TO COUNCIL'S INTERIM FINDINGS

Impact and effectiveness

Finding 1. Australia's mutual recognition schemes are working well for some occupations and have provided some benefits to workers across a range of industries.

We agree that mutual recognition has produced benefits in some occupations. We do not consider fire protection to be one of them. As outlined in our March 2026 submission, the practical experience of fire protection contractors and practitioners working interstate remains one of complexity, uncertainty, and significant administrative burden. The cross-border, short-term and surge labour mobility benefits highlighted in Finding 1 are unfortunately theoretical for our industry while exemptions and the underlying misalignment of frameworks persist.

Finding 2. While AMR has the potential to deliver significant mobility benefits, its effectiveness is limited by occupational exemptions and Queensland's lack of participation in the scheme.

We strongly endorse this finding. Fire protection work is explicitly exempted from AMR in Queensland and Victoria — the two jurisdictions with the most developed fire protection licensing regimes. These exemptions are not, in our view, incorrect protectionist measures. They are a rational response by regulators to a genuine safety concern: that automatically recognising credentials from jurisdictions with materially lower (or absent) licensing requirements would constitute a tangible reduction in standards in jurisdictions that have invested in stronger frameworks.

The Fire Industry Alliance does not seek the removal of these exemptions. We seek the alignment that would make them unnecessary. So long as some jurisdictions license fire protection comprehensively and others do not license it at all, exemptions are the only safe option — but they hollow out AMR's promise for our industry.

Finding 3. Mutual recognition schemes can allow for 'jurisdiction hopping'.

We support this finding. The Council identifies “building” and “plumbing” among the occupations of concern, both of which overlap with fire protection licence classes in some jurisdictions. The risk in fire protection is more acute than the Council’s general framing suggests, because the consequences of unqualified or under-qualified practitioners working on life-safety systems are not theoretical — they are measured in the Childers Palace, Quakers Hill, and Lacrosse Tower outcomes referenced in our earlier submission.

We acknowledge the Council’s observation that the data necessary to determine whether jurisdiction hopping is currently producing measurably worse safety outcomes is incomplete. We submit, however, that the absence of bad data is not the same as evidence of good outcomes. The data gap is itself a finding: in a life-safety critical industry, we cannot afford to wait for a measurable safety failure before acting. A national digital register, as discussed under Finding 11, would resolve much of this uncertainty.

Finding 4. The traditional MR scheme can allow for 'licence uplifting'.

The case study of ‘Mr S’ in the consultation paper is instructive. It is precisely the dynamic we identified in our March 2026 submission: mutual recognition, in the absence of substantive alignment, can become a mechanism for exporting lower standards into jurisdictions that have invested in stronger frameworks. The fix is not more rules around equivalence — it is alignment of the underlying scopes themselves.

Implementation and alignment

Finding 5. Mutual recognition schemes work best where there is a high level of regulatory alignment between jurisdictions.

We strongly endorse this finding, which is in our view the single most important conclusion in the Council’s interim report. We note with appreciation that the Fire Industry Alliance is cited in footnote 4 alongside AMCA, the Electrical Trades Union, and Master Plumbers as evidence supporting this finding.

The three dimensions the Council identifies — licence scope, terminology and classes; eligibility and competency requirements; and ongoing obligations — are precisely the dimensions on which fire protection is misaligned across Australian jurisdictions:

- **Scope.** Queensland licenses installation, maintenance, certification and design across five streams; Victoria and South Australia license water-based installation; Tasmania operates a permit system; Western Australia and the Northern Territory do not currently license fire protection installation and maintenance at all.

- **Qualifications.** The nationally recognised qualifications that should form the baseline — Certificate III in Fire Protection (CPC32820), Certificate III in Fire Protection Control (UEE31020), Certificate IV in Fire Systems Compliance (11002NAT), and the Diploma of Fire Systems Design (CPC50520) — are not consistently required across jurisdictions, even though they are the qualifications identified in the Australian Building Codes Board's National Registration Framework.
- **Ongoing obligations.** Continuing professional development, public registers, professional indemnity insurance, and renewal requirements vary materially between jurisdictions.

Finding 6. Application of local laws can undermine the effectiveness of mutual recognition.

We agree with this finding, with one important qualification. Local law requirements that are duplicative, inconsistent, or imposed without clear safety justification undermine the benefits of mutual recognition. However, in fire protection some “local law” requirements — particularly relating to insurance, the certification of works, and notifications to fire authorities — reflect legitimate jurisdictional differences in building law and fire services arrangements that are more than a friction to be removed.

The right response is to align local law requirements where alignment is sensible (for example, professional indemnity insurance thresholds and white card requirements) and to preserve them where they reflect genuine jurisdictional functions.

Finding 7. Information sharing between regulators is fragmented and heavily reliant on manual processes.

We strongly endorse this finding. The Fire Industry Alliance has advocated for a national digital register of licensed fire protection practitioners. The current reliance on manual updates of shared platforms creates exactly the risks the Council identifies — weak oversight, regulatory risk, undermined trust, and difficulty verifying credentials. In a life-safety critical industry, these are not just administrative inconveniences. They are gaps through which under-qualified or disqualified practitioners can move between jurisdictions undetected.

Finding 8. Regulators, employers and workers can face difficulty when attempting to determine the equivalence of licences under the MR scheme, and the Ministerial Declarations outlining equivalent licences are out of date.

We strongly endorse this finding. The static nature of Ministerial Declarations is fundamentally incompatible with the dynamic nature of modern licensing frameworks, where licence classes, scopes of work, and qualification requirements continue to evolve. The Fire Industry Alliance supports the move to flexible, transparent and digitally maintained equivalence mechanisms, and would welcome the opportunity to contribute fire protection expertise to that work.

Experience of Workers

Finding 9. Information provided to workers and employers using mutual recognition schemes can be fragmented and difficult to navigate, increasing compliance costs.

We strongly endorse this finding. Our March 2026 submission described the position as follows: there is no single, authoritative source where a fire protection practitioner or their employer can determine what is required to work in each particular jurisdiction. That assessment remains current.

Case study: A sprinkler fitter taking a short-term project interstate

A qualified sprinkler fitter living in the Northern Rivers Region holds the NSW Water plumbing – fire protection systems contractor licence and is offered a six-week project in Queensland. To take the work lawfully, the practitioner must: confirm the relevant Queensland licence class for water-based fire installation under Queensland's five-stream regime; identify whether AMR applies (in Queensland, for fire protection, it does not); apply for the relevant QBCC licence through a separate state portal; satisfy additional Queensland-specific requirements including evidence of insurance and tax compliance; and meet any Queensland-specific induction requirements.

For a six-week engagement, the regulatory pathway often takes longer than the project itself. The practical effect is either that the work does not proceed or that it proceeds with workers who already hold the right licence (potentially at a higher price), or that smaller contractors withdraw from interstate work altogether due to the cost of maintaining the various licenses and state specific compliance. Each of these outcomes is contrary to the productivity and labour mobility objectives of the schemes.

Opportunities to strengthen and streamline

Finding 10. Data limitations constrain evidence-based regulation and policy reform.

We endorse this finding. The Fire Industry Alliance will seek to contribute to industry-specific data collection on fire protection licensing, mobility, and compliance outcomes. We would welcome engagement with any body charged with developing a national data framework.

Finding 11. There is significant potential for technology to improve information sharing to licensees and between regulators, with stakeholders expressing strong support for digital licensing and the introduction of a national licensing register.

We strongly endorse this finding. A national or interoperable register and a digital licence are not optional improvements — they are the basic regulatory infrastructure required for any modern, mobile workforce in a safety-critical industry. The benefits the Council identifies (real-time verification, streamlined notifications, improved visibility of disciplinary action) are precisely the gaps the Fire Industry Alliance has been raising. We refer the Council to the more detailed proposal in our March 2026 submission and would welcome the opportunity to contribute to collaborating on scoping work on a fire protection register.

Finding 12. Stronger institutional arrangements would encourage national regulatory consistency and support enduring reform.

We strongly endorse this finding. The Fire Industry Alliance supports the establishment of a tripartite governance group with representation from governments, industry and unions, and periodic reviews of occupational licence equivalence. We would expect any such body, in relation to fire protection, to engage directly with the Fire Industry Alliance as the industry peak body, with Fire Industry Training as the leading RTO for the Fire Industry, the relevant Unions and with the Australian Building Codes Board, which administers the National Registration Framework relevant to fire safety practitioners.

Critically, the Fire Industry Alliance submits that without enduring institutional arrangements, jurisdictional regulatory regimes will continue to diverge — making the alignment task ever larger.

Finding 13. Concerns about training quality and fraudulently obtained credentials cannot be addressed through mutual recognition schemes alone.

We strongly endorse this finding. The Fire Industry Alliance has documented concerns about the consistency and rigour of training provided by some registered training organisations delivering fire protection qualifications, and about the limited ability of state regulators to refuse where training quality is in doubt. This finding requires action beyond mutual recognition reform: it requires direct engagement with the VET system and the regulation of RTOs.

The potential for a national licensing framework

Finding 14. National licensing may be desirable for some occupations, particularly if they comprise a large and mobile workforce, are subject to AMR exemptions, involve cross-border work that occurs remotely and/or there is tripartite support for a national scheme. In such cases, there may be benefits in taking a graduated approach that builds towards national licensing in a sequential manner.

We strongly endorse Finding 14, and submit that fire protection meets every one of the four prioritisation criteria the Council identifies:

Council's criterion (Finding 14)	Fire protection — Fire Industry Alliance Assessment
Large and mobile workforce	The fire protection industry employs tens of thousands of practitioners across nearly 3,000 businesses, with workforce demand growing in line with the national housing pipeline, the energy transition, infrastructure projects and the expansion of aged care and health infrastructure. Major contractors, developers, and specialist firms routinely operate across state borders.
Subject to AMR exemptions	Fire protection is explicitly exempted from AMR in Queensland and Victoria, the two jurisdictions with the most developed fire protection licensing frameworks. The marginal mobility benefit of removing these exemptions through alignment is therefore at the high end of the Council's schedule.
Cross-border work, including remote work	Fire protection design and certification work is routinely performed remotely across jurisdictions for projects in any state. The fire protection systems themselves are governed by the National Construction Code and Australian Standards, which apply nationally. The case for state-based licensing of work that is national in substance is weak.

Council's criterion (Finding 14)	Fire protection — Fire Industry Alliance Assessment
Tripartite support for a national scheme	The Fire Industry Alliance, as the peak industry body, supports a national licensing framework. The Building Confidence Report (Shergold and Weir, 2018) recommended mandatory practitioner registration, with endorsement by all jurisdictions in 2019. The qualification framework is already nationally recognised through the VET system and the National Registration Framework. The conditions for tripartite agreement on a national fire protection scheme exist now.

On each criterion, fire protection sits at the strong end of the case for national licensing. The Fire Industry Alliance therefore urges the Council to specifically nominate fire protection as a priority occupation for the national licensing pathway in its final report to CFFR — alongside (and on the same basis as) the electrical trades and engineering occupations the Australian Government has already nominated for a national approach.

A graduated approach, as the Council suggests, is acceptable provided it has an explicit endpoint and timeline. Australia has pursued harmonisation in construction including fire protection over many years with inadequate progress. The continued failure of the cooperative model strengthens, rather than weakens, the case for a Commonwealth-led national scheme. We urge the Council to recommend that, where the graduated approach does not deliver alignment within a defined period, a national scheme should follow.

The Fire Industry Alliance reiterates the position from our March 2026 submission: any alignment of standards must align upward, to best practice, and must not result in the reduction of existing standards in any jurisdiction.

RESPONSE TO CONSULTATION QUESTIONS

The Fire Industry Alliance's detailed responses to the consultation questions are covered by our findings-by-findings analysis above and our March 2026 submission. We summarise our position on selected questions of particular relevance below.

Q2. Evidence of productivity, workforce, or deployment improvements in our industry

The Fire Industry Alliance is unable to point to material productivity or deployment benefits delivered by MR or AMR for the fire protection industry to date. The economic potential of effective mutual recognition is substantial — the industry contributes over \$4.2 billion annually to the Australian economy — but the current fragmented arrangements continue to impose duplicative compliance costs and to limit interstate deployment, particularly for short-term and surge labour needs.

Q3. Safety or quality outcomes for MR/AMR workers vs locally licensed workers

The Fire Industry Alliance is not aware of any reliable comparative data on safety or quality outcomes for workers operating under MR or AMR versus locally licensed workers. The Council's own observation under Finding 10 — that no such evidence has been identified — is consistent with our experience. The Fire Industry Alliance considers the absence of data to itself be a finding, and a strong argument for the data framework proposed under Finding 11.

Q4. Prevalence of jurisdiction hopping and licence uplifting

Quantifying these practices is difficult precisely because of the data limitations identified by the Council. The Fire Industry Alliance receives anecdotal reports from our Members in jurisdictions with more developed licensing regimes of practitioners obtaining licences in jurisdictions with lower entry requirements and then seeking to work interstate. This dynamic has been a recurring source of concern in industry for some years. A national digital register would enable the systematic collection of evidence on these practices.

Q8. Are AMR exemptions proportionate to the risk of harm?

Yes, in the case of fire protection. The exemptions applied by Queensland and Victoria are a proportionate response to the genuine safety risks that would arise from automatically recognising fire protection credentials from jurisdictions with lower or absent licensing requirements. The exemptions should not be removed in advance of underlying alignment. The right path is to remove the need for the exemptions through alignment, not to remove the exemptions while the misalignment persists.

Q14. Are the schemes fit for purpose for remote, evolving, or skills-based work?

Increasingly, no. Fire protection design work is routinely performed remotely, with practitioners in one jurisdiction designing systems for projects in another. The current schemes do not cope well with this pattern. As the Council notes in Finding 14, this is one of the four criteria that strengthens the case for national licensing rather than further refinement of mutual recognition.

Q18. Which occupations would benefit from a national licensing framework, and why?

Fire protection. For the reasons set out in our response to Finding 14 above, fire protection meets all four of the Council's prioritisation criteria. The characteristics that make it suitable for national licensing are: a large and mobile workforce; standards (NCC, Australian Standards) and qualifications (VET) that are already national; current AMR exemptions; remote cross-border work in design; tripartite readiness; and a life-safety risk profile that makes the continued tolerance of jurisdictional gaps unacceptable.

Risks to be managed include: ensuring upward alignment to best practice; protecting transitional pathways for practitioners currently working in jurisdictions without licensing requirements (including through recognition of prior learning and experience); preserving legitimate jurisdictional functions; and ensuring that any national administrative arrangements are adequately resourced. None of these risks are reasons not to proceed — they are reasons to design the transition carefully.

RECOMMENDATIONS

The Fire Industry Alliance recommends that the Council, in its final report to the Council on Federal Financial Relations:

- 1. Specifically nominate fire protection as a priority occupation for the national licensing pathway under Finding 14, on the basis that fire protection meets all four prioritisation criteria.**
2. Recommend the implementation of comprehensive fire protection licensing in all states and territories, covering installation, maintenance, certification, and design, in line with the Building Confidence Report (Shergold and Weir, 2018) and as committed to by the Building Ministers Forum in July 2019.
3. Recommend that licensing in each jurisdiction be aligned to the qualifications set out in the ABCB's National Registration Framework: Certificate III (via apprenticeship) for installation and maintenance, Certificate IV for certification, and Diploma for design.
4. Recommend the introduction of a digital fire protection licence enabling real-time credential verification by regulators, employers and consumers and real-time visibility of disciplinary action and licence conditions across jurisdictions.
5. Recommend the establishment of a tripartite governance body, with explicit provision for industry peak body involvement, to oversee licensing alignment and equivalence on an ongoing basis to replace Ministerial Declarations.

6. Recommend a national data framework for the collection of licensing, mobility, and compliance outcomes data.
7. Recommend that, where a graduated approach is adopted, an explicit timeline and endpoint be set, with a national scheme to follow if alignment is not achieved within that period.
8. Recommend stronger oversight of registered training organisations delivering qualifications underpinning higher-risk occupational licences, including in fire protection.
9. Recommend mandatory continuing professional development for all fire protection licence classes.
10. Recommend that the Council on Federal Financial Relations engage directly with the Fire Industry Alliance on any further development of fire protection licensing reform.

CONCLUSION

Mutual recognition is the appropriate principle. In fire protection, it has been asked to do work it cannot do — to manufacture mobility across regulatory frameworks that are not, in any meaningful sense, equivalent. The Council's interim findings recognise this. The opportunity now is to act on it.

The Fire Industry Alliance urges the Council to use its final report to nominate fire protection as a priority for the national licensing pathway, alongside electrical trades and engineering. We have the standards. We have the qualifications. We have a national construction code. We have the industry support. What we lack is a national licensing instrument to complete the picture — and the lives saved, costs avoided, and productivity gained by completing it are not trivial.

The Fire Industry Alliance welcomes further engagement with the Council on any aspect of this submission, and would welcome the opportunity to contribute to any ongoing work.