



22 May 2026

Competition and Consumer Division
The Treasury
Langton Crescent
PARKES ACT 2600

Dear National Competition Council

Re: Response to Interim Findings – Review of Australia’s Mutual Recognition Schemes for Workers

Thank you for the opportunity to respond to the Council’s interim findings on the Review of Australia’s Mutual Recognition Scheme for Workers (the Review).

As the peak association representing 16,000 professionals across the resources sector, active in all Australian states and territories, and in more than 100 countries, AusIMM has welcomed the Council’s Review as a means of enhancing professional mobility while preserving the regulatory settings that ensure positive health, safety, environmental, social and economic outcomes for the community.

AusIMM supports the Council’s interim findings and recommendations, and note that:

- Insight from our peers across health, education, construction and other major industries reflects our emphasis on occupational and jurisdictional exemptions as key barriers to effective mutual recognition in Australia.
- More effective data sharing and the introduction of a single administrative portal for registration, assessment and record-keeping would boost mobility while the more substantive work of regulatory harmonisation progresses. Many mining professionals work across jurisdictions on a regular basis, including in remote and fly-in fly-out roles, meaning the administrative burden under current frameworks is exceptionally high for some disciplines.

- Underlying regulatory harmonisation is the key enabler for effective and enduring mutual recognition. As we outline in our initial submission, there are a range of engineering, health, safety and other regulatory settings that deal with risks particular to mining operations and regions. In practice, regulators and assessment bodies cite concerns about weakening these protections as the basis for resisting (or not fully implementing) mutual recognition.

We do not criticise this position; it reflects a prudent approach to managing risks in a high-risk industry. Reforms to enable mutual recognition must not indirectly lower professional or safety standards for our sector.

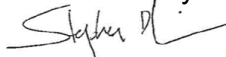
Our message is that a mutual recognition 'overlay' can only be implemented where underlying regulatory requirements are consistent. This is about the conditions of registration, the competencies and qualifications of individuals, and the health, safety, environmental and other standards they must meet

- Underlying regulatory harmonisation requires coordination at the industry, jurisdiction and professional level. Our view is that sector-specific working groups should be established with representation from professional bodies, industry, government and labour to progress harmonisation, under the auspices of the tripartite committee flagged in the Council's interim report.

We provide further commentary on the Council's interim report in the table overleaf. These comments reflect our system-level perspective as the sector's peak professional body, and the individual experiences of members across engineering, environmental science, social performance, health, safety and other key disciplines.

AusIMM welcomes the opportunity to engage further with the Council as part of this review, and I encourage you to contact Harry Turner, Senior Manager Government Relations, at hturner@ausimm.com or on 0411 564 982 to discuss further.

Yours sincerely



Stephen Durkin FAusIMM

CEO, AusIMM

AusIMM response to Interim Report findings	
Finding	AusIMM response
Australia's mutual recognition schemes are working well for some occupations and have provided some benefits to workers across a range of industries.	Agreed. The availability of automatic mutual recognition (AMR) available to mining professionals varies across jurisdictions and disciplines. In practice, the greatest benefits under current regulations exist not because of AMR <i>per se</i> but because professional assessment and regulatory processes are broadly consistent across borders. That is, cross-border recognition is more efficient and straightforward for individuals who have worked through similar processes in their primary place of work, and where the underlying competencies and assessment processes are similar. For example, mine health and safety regulations do not consistently provide for AMR but have similar competency requirements. This allows for <i>relatively</i> efficient cross-border registration, compared to disciplines like engineering where requirements vary substantially. There is still room for improvement across all disciplines, particularly through a single administrative portal.
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	Agreed. This is one of two core messages in AusIMM's initial submission, borne out in the case studies we provide there. State regulators and assessment bodies either do not allow, or do not implement, AMR frameworks due to concerns about the genuine equivalence of regulatory safeguards and assessment rigour between jurisdictions. Regulations and processes must be aligned to the highest common standard to give state regulators and administrators confidence that mutual recognition can be implemented without sacrificing health, safety, environmental, social and economic safeguards.

Mutual recognition schemes can allow for 'jurisdiction hopping', where workers obtain their licence in the jurisdiction with the least stringent entry requirements or fees, before using the schemes to undertake work in a different jurisdiction.	Agreed. This is one of the core risks regulators and professional bodies cite as a barrier to, or concern with, AMR. AusIMM is aware of anecdotal case studies of jurisdiction hopping and licence uplift, but cannot offer broader datasets to demonstrate the prevalence of this risk. AusIMM recommends the NCC coordinate with state regulators to gather data on the prevalence of 'jurisdiction hopping' and 'licence uplifting', looking at both applications and recorded non-compliance (i.e. where the offender has primary registration in another jurisdiction). A comprehensive dataset would support industry, regulators and professional bodies to prioritise regulatory harmonisation in a manner that reflects the actual prevalence and risk of jurisdiction-hopping and licence lifting. For example, it may be the case that prospective jurisdiction hopping is a greater issue for engineering disciplines than it is for health and hygiene roles, and this would indicate that engineering regulations should be harmonised as a priority to facilitate AMR.
The traditional MR scheme can allow for 'licence uplifting', where workers use the scheme to obtain licences that allow a larger scope of work compared to their home state licence.	Agreed. AusIMM recognise this as a potential risk for AMR schemes, but do not have specific data or case studies to indicate whether uplifting is prevalent in the resources sector. As with 'jurisdiction hopping', access to regulatory datasets would provide a comprehensive view of whether and in which professions this is most common (or where the greatest risk exists).
Mutual recognition schemes work best where there is a high level of regulatory alignment.	Agreed. As we describe above, harmonising underlying regulatory frameworks is the most important (and challenging) enabler for effective and comprehensive mutual recognition.
Application of local laws can undermine mutual recognition.	Agreed. As we describe above, harmonising underlying regulatory frameworks is the most important enabler for effective and comprehensive mutual recognition.

Information sharing between regulators is fragmented and heavily reliant on manual processes.	Agreed. Data-sharing, assessment processes and other administrative arrangements (e.g. insurance and professional development records) can be streamlined to deliver significant productivity benefits while underlying regulatory harmonisation is pursued at the jurisdictional, discipline and industry level.
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.	Agreed. A single administrative, assessment and record-keeping portal would deliver significant value for professionals working across jurisdictions. Ideally, such a portal would provide a consolidated view of which states, disciplines and industries allow AMR, and a single application point for individuals working across borders (whether AMR is in place or not). Importantly, a single administrative portal could also provide automated notifications to all state regulators when an individual seeks to work outside their home jurisdiction (i.e. by notifying regulators and professional bodies across states, and within states where relevant).
Information provided to workers and employers using mutual recognition schemes can be fragmented and difficult to navigate, increasing compliance costs.	Agreed. Further to our comment above, we provide case studies in our initial submission, enclosed with this submission for reference.
Data limitations constrain evidence-based regulation and policy reform.	Agreed. As noted above, more effective data-sharing between regulators would enable a single administrative portal, and provide a comprehensive evidence base to assess both the risk and actual prevalence of jurisdiction hopping, licence uplifts and other risks associated with AMR.
There is significant potential for technology to improve information sharing to licensees and between	Agreed. This is the key opportunity to deliver a streamlined and more efficient professional recognition system over the short and medium term, while underlying regulatory harmonisation is pursued.

regulators, with stakeholders expressing strong support for digital licensing and the introduction of a national licensing register.	
Stronger institutional arrangements would encourage national regulatory consistency and support enduring reform.	Agreed. Further to our comments above, a single administrative portal, nationally convened series of industry-specific working groups to align underlying regulations, and data-sharing between regulators to better understand the prevalence of jurisdiction hopping, licence upgrading and other risks associated with AMR would be of great benefit.
Concerns about training quality and fraudulently obtained credentials cannot be addressed through mutual recognition schemes alone.	Agreed. This is where the harmonisation of underlying safety, health, environmental and other regulations need to be aligned, as a necessary precursor to mutual recognition.
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 or there is tripartite support for a national scheme. In such cases, there may be benefit taking a graduated approach.	Agreed. In addition to establishing a single national administrative system, we recommend that the Council convene sector-specific working groups with representation from professional bodies, industry, government and labour to focus on harmonising underlying regulatory frameworks to enable AMR. These can report to or operate under the auspices of the tripartite committee flagged in the Council's interim report.