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Competition and Consumer Division
The Treasury
Langton Crescent
PARKES ACT 2600

Dear National Competition Council

Re: Review of Australia's Mutual Recognition Scheme for Workers

On behalf of the Australasian Institute of Mining and Metallurgy (AusIMM), I write to provide an initial response to the National Competition Council (NCC) review of Australia's Mutual Recognition Scheme for Workers (the Review).

AusIMM is the peak association representing 16,000 professionals working across the resources sector, in disciplines ranging from health and safety through to environmental management, social performance, engineering and materials science. As the trusted voice in resources, we shape policy, uphold standards and connect a global professional network to advance the sector for the community's benefit.

The response we provide in this letter outlines our perspective as an association delivering professional standards, certification, competency and professional development programs for the resources sector. We share the insights and experience of members working across a breadth of disciplines, covered variously by mandatory and voluntary, legislative and administrative, and regulator and industry managed frameworks for professional competency assessment and recognition.

Our key message is that a fully implemented national framework to assess, register and recognise professionals is vital to advance the Australian resources sector's position at the vanguard of best practice and technical excellence globally. This is especially important as we navigate a changing higher education and training landscape at home and build capability to capture a greater share of the minerals, materials and manufacturing value chain abroad.

Our insight is that practical implementation fails where the underlying regulatory requirements for specific disciplines and industries are not appropriately delineated and aligned. The consequence is that regulators, professional associations and assessment bodies retain significant concerns regarding the genuine equivalence of state and territory standards, the

rigour of assessment processes, their relevance for industry, and the associated prospect of 'jurisdiction shopping' by individuals lacking relevant competencies and industry expertise. Aligning regulatory requirements for specific disciplines is necessary not only to address these concerns, but to deliver a streamlined framework that deals appropriately with the various administrative and procedural inefficiencies we canvass in this initial submission.

The impacts of failing to harmonise effectively include reduced professional mobility, poor access for industry to vital professional skillsets, substantial costs and inefficiencies for registrants (including duplicate fees, misaligned registration timelines and inconsistent professional development, insurance and other requirements), duplication of effort and cost by state and federal regulators, and a failure to realise any benefit in terms of industry output, productivity, environmental management or health and safety performance.

Failing to realise these benefits also represents a substantial lost opportunity for Australia's resources sector. The skills and expertise of Australian resources professionals is the basis for our sector's leading position as a supplier of minerals, materials and 'know-how' globally. As we seek to extend this position to meet growing demand for various commodities, products and services, the mobility of our professional workforce and their ability to demonstrate our sector's capability across borders will be key.

To make meaningful progress towards a harmonised national framework, AusIMM see two priorities. The first is to align underlying regulatory frameworks for all disciplines, again by delineating effectively between disciplines active in the sector, ensuring appropriate regulatory provisions are in place, and connecting regulators across jurisdictions to harmonise. This is the most complex and challenging aspect of mutual recognition in practice.

The second area is to align administrative frameworks and 'front end' systems to provide a more consistent experience and greater clarity for professionals managing registrations across multiple jurisdictions. Meaningful progress can be made here to align and consolidate assessment, registration, record-keeping and financial aspects of professional registration while the underlying regulatory harmonisation project is pursued.

This not simply a story about what the resources sector needs, but what it can deliver for Australia's broader science and industrial base. Greater professional mobility would lift productivity, skills utilisation, and research and industrial capability across the broader Australian Science, Technology, Engineering and Mathematics (STEM) ecosystem. Forthcoming AusIMM research demonstrates the substantial role our sector can play in engaging, developing and utilising the skills of our growing STEM graduate pool, but once again an effective professional recognition framework will be necessary to ensure skills can be deployed across the disciplines, industries and locations where demand is most substantial.

Given the significance of this issue for both our sector and its role advancing the broader

national interest, we specifically request an opportunity to brief the Council on the matters raised in this letter, as well as our forthcoming research, as part of the ongoing Review.

We trust the insights provided in this initial letter will be of some value to the NCC as it progresses the Review and will welcome the opportunity to contribute to future consultation. I encourage you to contact our Senior Manager for Government Relations, Harry Turner, on (61)411 564 982 or at hturner@ausimm.com to discuss further.

Yours sincerely

Stephen Durkin FAusIMM
CEO, AusIMM

DETAILED RESPONSE TO THE COUNCIL'S REVIEW QUESTIONS

Please note we respond at this stage to select questions from the Council's Terms of Reference, noting the significant intersection between issues raised in the Review.

Impact and effectiveness of mutual recognition schemes

Have mutual recognition schemes made it easier to work across jurisdictions or pursue job opportunities outside of a worker's home state or territory?

Mutual recognition schemes have had a varied impact across the resources sector, depending on the jurisdiction, discipline and level of regulation at which the framework is administered. Generally, mutual recognition has not made it easier to work across jurisdictions.

Engineering, health and safety disciplines have the longest history of coverage under legislative registration frameworks and so are the most obvious potential beneficiaries of a Mutual Recognition Act (MRA). In practice, however, benefits have not been realised due to:

- Incomplete implementation by regulators with specific authority for assessing and administering competencies in specific disciplines or sectors (like engineering, or in relation to mine health and safety).

- A lack of clear support and endorsement from professional and non-government organisations, typically due to concerns regarding the quality of assessment, complaint and disciplinary frameworks across jurisdictions, or the relevance of generic professional registration frameworks for specific industry circumstances.

- Extra-jurisdictional application of some legislation, for example where an engineer must be registered for services provided in Queensland and outside Queensland (where services are provided from Queensland).

- Variable cost, application timelines and audit processes, which compound concerns regarding the relative rigour and 'quality' of different state and territory frameworks.

- Unintended outcomes including the requirement for post-qualification experience, which we describe at greater length in the sections that follow.

Beyond engineering, health and safety, there has been a recent proliferation of voluntary frameworks in fields such as environmental and social performance. AusIMM recognise the fundamental role these frameworks have in defining and upholding professional competencies – indeed, it is a core part of our function within the resources sector.

The proliferation of such frameworks, and their management by organisations with varying levels of financial and governance maturity, however, is not ideal to deliver national harmonisation or support cross-border workforce mobility.

Have mutual recognition arrangements generated economic benefits? For example, have they helped to address workforce participation, skills shortages or productivity?

AusIMM would support a whole-of-economy analysis of mutual recognition arrangements. While there have been a breadth of studies demonstrating that poor mobility has hampered productivity growth, there are few contemporary assessments of the role mutual recognition can play in addressing this challenge. The most recent analysis of which we are aware dates to 2015, when the Productivity Commission identified many of the priorities we outline here.[1]

Forthcoming AusIMM research commissioned though the Bankwest Curtin Economic Centre demonstrates the potential for our sector to boost course completion and skills utilisation for students and new professionals working across STEM disciplines. By expanding pathways for STEM professionals to pursue careers in resources, AusIMM see an opportunity to meet looming workforce shortage while also contributing to Australia broader STEM ecosystem.

In many cases, this will lift skills utilisation for fields of study where graduate outcomes are poorest, and where a high proportion of students are female, have First Nations heritage or are from a culturally or linguistically diverse background.

A more efficient and nationally harmonised recognition framework would enhance the impact of improved STEM skill development and utilisation, by ensuring skilled workers can apply their skills across industry and around the country.

Does the MRA, and the processes and policies implemented by jurisdictions in support of its operation, appropriately manage risks to worker safety and consumer protection?

There have been long-standing concerns in the resources sector regarding the potential safety and other risks associated with 'jurisdiction shopping' for people seeking to occupy safety-critical statutory occupations in high hazard operations such as coal and metalliferous mining.

Statutory boards of examination in major mining states appropriately apply rigorous standards as part of 'certificate of competency examinations' before granting individuals a 'ticket' to hold key statutory roles on site. There has been a perception in the sector that one way to bypass these exams is to obtain a comparable certificate in another jurisdiction, and to then access work in other states through the MRA system. The same concerns have been observed in other professions including dentistry, gas fitting, surveying, electrical trades and construction.

Our message, therefore, is that risks to worker safety, consumer protection and the environment cannot be sacrificed in pursuit of the benefits mutual recognition offers. To give confidence and enable effective mutual recognition implementation, underlying regulatory settings need to be aligned towards a highest common standard and delineate appropriately between industries and specific professional disciplines.

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[1] See, for example, Commonwealth Treasury, 2022, 'Reaching for the Starts: Australian Firms and the Global Productivity Frontier', available at the embedded link and Productivity Commission, 2015, 'Mutual Recognition Schemes: Productivity Commission Research Report', available at the embedded link.

Implementation and alignment of mutual recognition schemes

Have mutual recognition schemes been implemented consistently across jurisdictions? Where variations exist, are they clear, adequately justified and proportionate to risk?

Mutual recognition schemes have not been implemented consistently across disciplines, sectors or legislative frameworks. The clearest examples again exist in health and safety regulation, and in the registration of professional engineers.

Current engineering programs, which operate under discrete statutory regimes in each state, do not allow for automatic mutual recognition, or otherwise apply a range of additional requirements that constitute a de facto re-assessment (or re-processing) of an individual's competency and fitness for registration. This results in substantial duplication of efforts for engineers working across multiple states, even where mutual recognition is nominally available, and reiterates the importance of addressing root concerns regarding the substantive alignment of underlying regulatory frameworks. National harmonisation efforts require significant and direct industry input to ensure they are implemented effectively, and with a sufficient degree of adaptation to account for health, safety and other risks relevant for specific sectors.

How do exemptions, delays or inconsistencies impact on the operation of mutual recognition schemes and the benefits that these schemes are intended to provide?

AusIMM members working as mining engineers have shared several examples of exemptions, delays and inconsistencies in jurisdictions where the MRA framework is nominally in place. To contrast Victoria and Queensland, consider that:

- The board of Professional Engineers Queensland does not require Professional Indemnity insurance, whereas the Business Licensing Authority in Victoria does.
- Continuing professional development requirements are substantially different between Queensland and Victoria, notwithstanding the mutual recognition framework.
- BPEQ has an extensive engineering governance board, working under state legislation, whereas BLA assessments are not supported by the same level of engineering professional expertise.
- BPEQ audit requirements depart from registration requirements.

Members add that state-by-state registration can become expensive and that notification systems across states are not consistent, which can complicate the task of 'tracking' expiration and renewal timelines when working across borders.

This suggests several 'quick wins' are available to government where the administrative and customer-service interfaces that sit over state level frameworks are aligned, to support mobility while the more complex task of substantive national harmonisation is pursued.

We provide a further case study, adapted from member feedback, at Appendix 1.

To what extent are licensing and registration laws and standards harmonised across jurisdictions? Where they are misaligned, does this make it harder to work across jurisdictions and/or pursue job opportunities? If so, how?

Harmonised administration and the alignment of underlying regulatory requirements at the industry and professional level are the two key enablers for effective mutual recognition.

Even for professions and sectors where the MRA framework applies, such as engineering, the reality is that administration at the state level has not proven to be an effective mechanism of putting mutual recognition into practice. The example for professional engineers in Queensland again provides a case study. The legislation requires that engineers be registered at the state level for work undertaken in Queensland, and beyond Queensland (where the engineer is still based in Queensland). The extra-territorial application of this clause means registration will likely be required in both the state of residence and the state of service, with the consequence that (at least) two levels of assessment, recognition and administration apply.

A national system could avoid duplicate fees, reassessment and administrative burden for professionals, while also reducing financial and other resourcing pressures on state-assessment bodies.

This could be delivered through the establishment of national professional registration body, with discrete decision-making and oversight processes for specific professions and industries; or through continued state-level administration with a more comprehensive harmonisation and referral of administrative functions to a national authority. Under both models, a national 'interface' for prospective registrants with a single portal for applying, assessing, maintaining registrations and managing fee, professional development and other processes would be invaluable.

Safety and health demonstrate the importance of aligning substantive regulatory frameworks, with mutual recognition resisted or frustrated by concerns within industry and regulatory bodies regarding the prospect of 'jurisdiction shopping' by professionals lack relevant competencies and qualifications.

Qualification pathways and professional registration

Consider, also, the unintended impact of post-qualification experience requirements for engineers seeking recognition under schemes such as the Registered Professional Engineers Queensland (RPEQ) program. Please note that we cite the RPEQ framework as an example of a broader challenge, rather than as an especially egregious example of the perverse impact on professional mobility in our sector.

Traditional qualification pathways for specialist mining disciplines disciplines including mining engineering, geological sciences and metallurgy are under significant strain in Australia. Course closures and restructuring across regional and metropolitan universities have created an imperative for our sector to expand qualification pathways and take a more considered approach to recognising prior professional experience when setting criteria and assessing

applicants for registration as specialists in our industry.[2] While the challenge is especially acute now, the impact does not only impact new graduates and early career professionals, but also functions to foreclose registration opportunities for established professionals with decades of experience working in the resources sector

The case study at Appendix 1 is relevant here, but consider also that under the RPEQ system:

- Many professionals with 20+ years mining industry experience make the decision to seek registration as part of their continuing career development.
- These professionals often have qualifications in civil engineering, or occasionally in a science field, rather than a specialist mining engineering degree.
- RPEQ (and similar schemes) require professionals to demonstrate a continuous period of post-qualification experience in the mining sector before obtaining registration.
- The requirement here is typically for a specialist mining qualification, meaning professionals seeking RPE recognition must complete a postgraduate mining qualification before obtaining registration.
- Even where prospective applicants obtain a postgraduate specialist qualification, prior experience may not be counted towards the applicant's post-graduate experience.
- The impact is that a well-established and highly expert professional may have to undertake an additional three-four years of study, and more than five years of continued work in industry on top of their undergraduate qualification and previous decades of work in the sector, to obtain RPEQ recognition.

AusIMM's engagement with international counterparts including the Institute of Materials, Mining and Energy and Global Minerals Professionals Alliance indicates there are similar challenges impact our sector in other jurisdictions, and strong support from industry, community and government to establish a more efficient framework for recognising specialist skillsets and facilitating recognition across intra- and international boundaries.

[2] AusIMM's Professional Pathways Whitepaper explores this challenge at length, and can be access at the link enclosed here.

Opportunities to strengthen and streamline licensing arrangements

National administrative alignment and underlying regulatory alignment across state and federal jurisdictions are the two key opportunities to strengthen and streamline professional licensing.

AusIMM members emphasise Australia is too small a market to have multiple systems, and indicate they would support either a single national registration body or more effective regulatory alignment and administrative coordination including harmonised legislation, a single national (and digital) registration, online verification and data standards, and ideally a single interface for reporting professional development, registration fees, insurance and licensing renewal periods.

We note our response to the proceeding question, where we outline possible models for a streamlined national registration framework (at both the regulatory and administrative levels).

How can technologies, systems and/or processes reduce costs and improve safety, quality and employment outcomes?

Implementing the substantive regulatory harmonisation, we discuss above, and coupling this with a streamlined national administration framework, would reduce costs to professionals, regulators and government, and in AusIMM's view deliver a more effective response to improve safety, quality and employment outcomes. An optimised and systemised digital-first system would be a central element of this approach.

In what circumstances could a national licence (broadly defined as a single licence recognised in all jurisdictions to a common set of regulatory standards) complement or replace existing mutual recognition arrangements? What would be the potential benefits and costs of moving to a national licensing scheme?

From an administration perspective the elimination of state systems, and centralisation into one system provides cost, administrative consistency and benefits to end users accessing registrants' services. It also improves the competitiveness of the industries that rely on professional registration as a measure of competency and qualifications. In practice, this will require an alignment of regulatory frameworks towards a 'highest common standard' with an appropriate mechanism to account for profession and industry-specific regulatory regimes.

Appendix 1. Case study on the intersection between qualifications, recognition and professional mobility in the resources sector

The following case study has been adapted from the direct examples provided by AusIMM members working across engineering, earth science and metallurgical disciplines.

Scenario

A professional working in resources with a background in metallurgy navigates a system that demonstrates the limitations of an assessment framework that has not kept pace with modern industry requirements or changes in tertiary education. The professional has:

- A Bachelor of Applied Science (Metallurgy), University of Ballarat (2001) and was part of the final graduating cohort prior to department closure.
- Trained across Primary, Secondary, and Tertiary Metallurgy (mining/extractive, smelting/refining/hydrometallurgy, and materials science).
- Has gained more than 20 years' experience in base metals, iron ore, geometallurgy, flowsheet evaluation and optimisation, mineralogy, and operations.
- Has functional expertise across advanced areas including flotation, comminution, magnetic separation, crushing and grinding.
- Has authored and co-authored more than 13 technical publications
- Is a Member of AusIMM, with more than 14 years continuous membership, including 12 years as a Chartered Professional, and became a Fellow in 2026.

1. Impact and Effectiveness of Current Recognition Schemes

Current mutual recognition frameworks place disproportionate emphasis on degree accreditation (e.g., the Washington Accord), rather than on demonstrated professional capability or the historical accreditation of degrees that have since been altered or discontinued within Australian universities. As a result, senior professionals are being assessed through graduate-level equivalency processes designed for new entrants, not experienced Engineers/Metallurgists/Geologists.

Consequences:

- Highly experienced professionals are treated the same as graduates
- Technical leadership, industry contribution, and lifelong competence are undervalued
- Recognition processes do not reflect industry reality or risk profiles

This creates significant and unnecessary barriers to participation.

2. Misalignment With Modern University Pathways

Significant restructuring has occurred across both metallurgy and geoscience, complicating the assessment for industries with multiple generations of qualified professionals.

2.1 Contextual note on Metallurgy degrees in Australia?

Standalone metallurgy degrees have almost entirely disappeared from Australia's tertiary system.

- The University of Ballarat, which historically delivered metallurgy programs (including mine), is now listed as a defunct tertiary institution, and those programs have long since ceased.
- Today, metallurgy is taught at only three universities—Curtin University, Murdoch University, and the University of Queensland—through the Metallurgical Education Partnership (MEP).

Only three universities in Australia still teach metallurgy as a four-year degree.

All other historical metallurgy programs have been closed, merged, or absorbed into chemical or process engineering streams, indicating a significant reduction in the availability of dedicated metallurgy programs.

Under current recognition pathways, these legacy metallurgy degrees (and these limited current degrees) are not automatically recognised, not because they lack merit, but because they fall outside the Washington Accord, which did not apply to Applied Science metallurgy degrees even when they were active. This mismatch forces experienced professionals to take graduate equivalency assessments despite decades of practice.

Contextual note on Geology and Geoscience Restructuring

Geoscience has experienced a similar contraction:

- Federation University has closed its 155-year-old geology and geoscience programs due to declining enrolments.
- Nationwide, universities have discontinued ~20% of geoscience teaching capacity, with an additional 25% currently under review.
- Several universities have closed geology and geotechnical engineering departments entirely, including Macquarie University, the University of Newcastle, and the University of Wollongong.
- Other institutions, such as UNE, now embed geology within wider Earth & Environmental Science programs.

These changes reflect deep structural shifts, not isolated cases.

3. Experience Navigating the Current System

The professional's RPEQ application was placed on hold solely because their metallurgy degree predates Washington Accord accreditation by their university—even though:

- *They hold a comprehensive metallurgy qualification*

- *They have 20+ years of industry experience*
- *They hold CP certification and have published extensively*

The professional must now undergo a **Stage 1 graduate-equivalency assessment**, costing an additional $865, which will duplicate documentation already supplied. This process is not suited to senior practitioners and does not meaningfully assess competence.

This demonstrates that the current pathway functions primarily as a gatekeeping mechanism rather than an assessment of professional capability.

3.1 Contextual note on industry hiring trends and discipline substitution

The reduction of metallurgy programs has forced the industry to change its recruitment practices. Job advertisements now routinely list *"Degree in Metallurgy or Chemical/Process Engineering"* or similar for many metallurgist roles.

This suggests that industry is substituting chemical engineers for metallurgists due to supply shortages. Chemical engineers, however, typically study mineral processing only as a minor component of their degree. University curriculum expectations for chemical engineering explicitly list mineral processing as one unit within a broader program. By contrast, metallurgy is fundamentally about mineral separation, involving complex physical and chemical processes distinct from the elemental or molecular separation underpinning chemical engineering.

Industry feedback confirms companies must now invest significantly in in-house training to compensate for the reduced academic depth. This demonstrates an urgent need for recognition frameworks that value competency and experience rather than degree titles.

4. Opportunities for improvement

- Establish 'Or equivalent' and experience-based pathways for senior professionals
- Recognise AusIMM CP accreditation as a valid demonstration of competence
- Eliminate duplicate assessments where capability is already established
- Update recognition frameworks to reflect modern university structures and industry needs

5. Considerations for a national licensing framework

Any future system must avoid amplifying errors already present by:

- Moving away from rigid degree accreditation
- Evaluating demonstrated capability, not outdated administrative classifications
- Ensuring modern multidisciplinary graduates are not disadvantaged
- Supporting competency pipelines across metallurgy, geoscience, and minerals engineering

6. Contextual note on Metallurgy and practical Licensing Considerations

Metallurgists rarely sign off on statutory engineering designs. Most metallurgical failures relate to:

- Operational variability
- Process optimisation
- Throughput or design bottlenecks

These do not fit the traditional engineering risk models underpinning RPEQ requirements for structural, mechanical, or electrical engineers. This strengthens the case for **a more tailored recognition model** for metallurgy.

Australia's recognition systems must evolve to reflect:

- The near-total disappearance of standalone metallurgy degrees
- Widespread restructuring of geoscience education
- Industry's increasing reliance on chemical engineers as substitutes
- The need for competency-based pathways for experienced Engineers/Metallurgists/Geologists