

## Comment – National Electrical and Communications Association

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NECA's submission focuses on one critical theme: the need to eliminate duplicative and inconsistent regulatory burdens impeding productivity, particularly in the electrical trades. Our economy is under increasing pressure productivity challenges and excessive, fragmented, and inconsistent regulation is a significant drag on productivity, contributing to broader financial and operational challenges. The cumulative impacts include delays, cost overruns, reduced innovation, and constrained workforce movement—factors especially critical in Queensland given its extensive infrastructure pipeline and regional workforce structure.

Our members report their businesses frequently operate in “survival mode” due to:

- Long planning and approval timelines.
- Regulatory red tape.
- Inconsistent procurement and licensing rules.

As Queensland seeks to increase housing supply, infrastructure delivery, and construction efficiency, regulatory reform must be a priority.

NECA urges the QPC to adopt a critical productivity-focused lens on licensing, compliance, and approval processes that currently disadvantage electrotechnology businesses.

NECA is committed to working with government to develop practical, industry-informed reforms that enhance efficiency without compromising safety or quality.

# Queensland Productivity Commission

**Removing Regulatory Burden to Improve  
Electrical Productivity in Queensland's  
Construction Sector**

**2<sup>nd</sup> JUNE 2025**

## About NECA

The National Electrical and Communications Association (NECA) is the peak body for Australia's electrical and communications industry, representing over 6,500 businesses. The industry employs 241,600 people through 56,402 businesses and is made up of electrical contractors, electricity network operators, communications specialists, and digital transformation experts, and will form the backbone of our nation-building efforts.

This sector will drive Australia's transition to a sustainable, tech-driven economy by modernising our infrastructure, enhancing energy security, and supporting the renewable energy revolution. It will play a pivotal role in addressing national priorities such as expanding renewable energy, enabling carbon capture, building climate-resilient infrastructure, electrifying transport systems, rolling out electric vehicle charging networks, and improving national digital connectivity.

The industry generates more than \$80 billion annually and spans a diverse range of sectors, that includes building and construction in residential commercial, industrial and large scale infrastructure, as well as mining, air conditioning, refrigeration, manufacturing, communications, defence and renewable energy.

NECA members play a vital role in Australia's economy, powering businesses, homes, and critical infrastructure. Their work enhances energy security, drives investment, and delivers sustainable, affordable solutions. NECA is committed to maintaining high industry standards, safeguarding the reputation and safety of the electrotechnology sector for tradespeople, consumers, and the broader community.

For over 100 years, NECA has advocated for the electrotechnology industry, championing safety, efficiency, and regulatory compliance. The association represents the sector at all levels of government and within key industry forums.

## Introduction

As Australia transitions to a low-emissions, technology-driven economy, we must ensure that our most critical asset, our people are equipped with the skills and support to meet the future with confidence.

Our economy is under increasing pressure productivity challenges and **excessive, fragmented, and inconsistent regulation is a significant drag on productivity**, contributing to broader financial and operational challenges. The cumulative impacts include delays, cost overruns, reduced innovation, and constrained workforce movement—factors especially critical in Queensland given its extensive infrastructure pipeline and regional workforce structure.

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The *Productivity Commission's Housing construction productivity: Can we fix it?* (February 2025) estimates cost impacts from 12 to 53% productivity decline across measures:

*Dwelling construction **labour productivity** fell by 12% and **physical productivity** (dwellings per hour worked) dropped by 53% over 30 years, while broader economy labour productivity rose by 49% ( PC:Page 2, Figure 1; Pages 16–17)* and **multifactor productivity** in the construction industry **declined by 0.5% annually** over the two decades to June 2024, **the fourth worst** performance among market sectors.

Our members report their businesses frequently operate in “**survival mode**” due to:

- Long planning and approval timelines.
- Regulatory red tape.
- Inconsistent procurement and licensing rules.

This submission addresses the Queensland Productivity Commission's (QPC) call for input into its inquiry on opportunities to improve productivity in the construction sector, aligning with the inquiry's Terms of Reference. Our submission focuses on one critical theme: **the need to eliminate duplicative and inconsistent regulatory burdens impeding productivity, particularly in the electrical trades** and recommendations to enhance productivity and cost-efficiency in the sector

## Recommendations

As the peak industry body for Australia's electrical and communications industry, NECA provides the following recommendations on behalf of its members nationally:

1. Implement a national occupational licensing framework
2. Develop a harmonised national incident reporting framework.
3. Enable single-point digital submissions to reduce reporting fatigue.
4. Introduce fixed statutory timelines for connection approvals.
5. Streamline approvals for certified low-risk infrastructure.
6. Pilot a fast-track certification lane for licensed contractors.
7. Collaborative approach to reduce red tape by streamline the administrative process

## Duplicative Licensing and Certification Requirements

### Issues Include :

Electrical contractors operating across jurisdictions, particularly near borders (e.g., Coolangatta/Tweed, Goondiwindi), must comply with different licensing, insurance, and competency requirements enforced by separate regulators.

### Impact:

Increases administrative burden on businesses.

Reduces workforce mobility.

Delays project start and completion times.

### Recommendation:

Implement a national occupational licensing framework for electrotechnology. This aligns with Productivity Commission recommendations for improving workforce mobility.

## Case Study: Emergency Lighting - Licensing Duplication

In Queensland, electrical contractors must separately obtain qualifications additional to the electrical qualifications already held for the same UoC recognized prior learning (RPL) is not being accepted to receive endorsement and be able to obtain a **QBCC Fire Protection Licence** to inspect emergency lighting. This creates a double-handling of competency requirements.

### Issue:

NECA Members with 25+ years of experience as licensed electricians in installation, maintenance and testing of Emergency and Exit Lightening are required to undertake specific units of competency (UoC), despite already holding high-level qualifications and experience under ESO the licensing frameworks (ie QTP & QBP) that are more than adequate.

Installation of Emergency & Exit light fittings is electrical work by definition which is regulated by the QLD Electrical Safety legislation & Act

### Example:

When two electrical contractor were recently denied renewal of their fire protection licence (specifically as nominee supervisor for *Electrical- inspect and test-emergency lighting*<sup>2</sup>) due to not meeting additional QBCC specified UoC's 3 a-g, including business planning and cost estimation units unrelated to core electrical inspection activities.

<p>Select your licence type <sup>1</sup></p> <p>Individual</p>	<ol style="list-style-type: none"> <li>successful completion of Certificate III in Fire Protection Control UEE31020, including the following unit of competency:             <ol style="list-style-type: none"> <li>Inspect and test emergency and exit lighting systems CPPFES2026; or</li> </ol> </li> <li>Possession of an electrical mechanic licence; and</li> <li>successful completion of the following units of competency:             <ol style="list-style-type: none"> <li>Read and interpret plans and specifications CPCBC4012;</li> <li>Carry out work-based risk control processes CPCPCM4011;</li> <li>Estimate and cost work CPCPCM4012;</li> <li>Prepare simple drawings CPCPCM3024;</li> <li>Establish legal and risk management requirements of new business ventures BSBESB402;</li> <li>Plan finances for new business ventures BSBESB403;</li> <li>Research and develop business plans BSBESB401; or</li> </ol> </li> <li>successful completion of a course or units of competency of a course, the commission considers is at least equivalent to the course or units of competency mentioned in paragraph (1) or (3).</li> </ol>
<p>Select your licence stream <sup>1</sup></p> <p>Electrical</p>	
<p>Select your licence class <sup>1</sup></p> <p>Inspect and test - Emergency lighting</p>	
<p>Select your licence grade <sup>1</sup></p> <p>Nominee supervisor</p>	

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### Impact:

Skilled supervisors are forced into unnecessary retraining.

Business costs increase without improving safety or compliance outcomes.

Penalising established electrical licenced holders (QTP).

<sup>2</sup> <https://www.qbcc.qld.gov.au/licences/apply-licence/available-licences/fire-protection/fire-protection-electrical-inspect-test>

<sup>3</sup> <https://tinyurl.com/QBCCF>

**Recommendation:**

NECA urges the Queensland Government to review and redraft licensing prerequisites for the “Inspect and Test Emergency Lighting” class (and other QBCC license classes that specify additional mandatory UoC’s) to:

- Recognise equivalent certifications under ESO/QTP licensing.
- Remove irrelevant business units (e.g., BSBESB401-403).
- acknowledge the experience and standing of existing license holders.

## Inefficient Electrical Safety Compliance and Incident Reporting

**Issue:**

Multiple regulators (e.g., QBCC, ESO, WorkSafe) demand overlapping reports for the same incidents, with no streamlined data-sharing protocols.

**Impact:**

Diverts skilled tradespeople from on-site productivity.

Duplicates compliance efforts.

**Recommendation:**

Develop a harmonised national incident reporting framework integrated with existing WHS systems. Enable single-point digital submissions to reduce reporting fatigue.

## Delays in Infrastructure Approvals and Grid Connections

**Issue:**

Small electrical businesses involved in housing developments face delays in approvals and confusion due to fragmented environmental and utility regulations.

**Impact:**

Idle labour and higher project costs.

Frustrated clients and reduced builder confidence.

**Recommendation:**

Introduce fixed statutory timelines for connection approvals.

Streamline approvals for certified low-risk infrastructure.

Pilot a fast-track certification lane for licensed contractors.

## Reducing Red Tape in the Transition Process

In Queensland, electrical work can only be legally performed by two categories of individuals:

A licensed electrical contractor (qualified tradesperson), or

A registered apprentice.

Upon reaching the end of their formal apprenticeship contract, which is managed by the Department of Education (DESBT), apprentices are no longer legally permitted to perform electrical work. Until they receive formal recognition from the Electrical Safety Office (ESO)—which includes publication on the ESO website and, eventually, issuance of a blue coloured License Card—they may only undertake non-electrical tasks.

The transition period between the nominal completion date of the apprenticeship and the official issuance of the licence involves two key steps:

TAFE Queensland has 10 business days from the apprentice's nominal completion date to confirm successful completion and forward the documentation to ESO.

ESO then has up to 21 business days to process the paperwork and issue the licence.

Although this process should take a maximum of 31 days, in practice, delays—particularly at the TAFE stage due to administrative workload—often extend this timeline. As a result, apprentices are left in limbo, unable to work in their trade, forced to seek non-electrical work, or simply remain idle.

NECA proposes a collaborative approach involving TAFE, ESO, and employers to streamline the administrative process. Specifically, we recommend that:

The ESO be authorised to provisionally acknowledge the apprentice's successful completion as of the nominal completion date.

A conditional licence be granted under the employer's licence, provided the apprentice has submitted all required documentation to the ESO prior to the completion of their apprenticeship.

This change would:

Minimise downtime for newly qualified tradespeople,

Enable employers to retain skilled workers without interruption, and

Alleviate pressure on the electrical industry caused by unnecessary administrative delays.

Streamlining this process is essential for improving workforce continuity and ensuring that newly qualified tradespeople can transition into full employment without delay.

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## Regulatory Reform Priorities

NECA supports the Productivity Commission's findings that overly complex, overlapping and inconsistent regulations are key inhibitors to construction productivity. We echo the following reform actions:

**National Occupational Licensing:** Streamline licensing across states to remove jurisdictional inefficiencies.

**Simplified Environmental Approvals:** Remove redundant layers and inter-agency delays.

**Fixed Regulatory Timeframes:** Hold agencies accountable for timely decisions.

**Cost Transparency:** Ensure efficient cost recovery and reporting clarity from regulators.

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## Options for Improving Productivity

Drawing on both the Productivity Commission's 2025 report and NECA's Pre-Budget Submission, we propose:

**Streamlined Digital Portals:** Create a single digital platform for regulatory interactions across planning, environmental, and electrical licensing.

**Apprenticeship Reform:** Fast-track mutual recognition of trade qualifications and reduce bureaucratic delays in apprentice supervision and mentoring.

**Industry Collaboration:** Adopt a user-centric approach involving government, peak bodies (like NECA), and small business in regulatory design.

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## Conclusion

The duplication and inconsistency of regulatory requirements is a direct and avoidable burden on productivity. As Queensland seeks to increase housing supply, infrastructure delivery, and construction efficiency, regulatory reform must be a priority.

NECA urges the QPC to adopt a critical productivity-focused lens on licensing, compliance, and approval processes that currently disadvantage electrotechnology businesses.

NECA is committed to working with government to develop practical, industry-informed reforms that enhance efficiency without compromising safety or quality.

To arrange a meeting or discuss this proposal further, please contact:

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