AIRAH

HVAC&R FOR A BETTER WORLD

March 31, 2026

National Competition Council

To the consultation team,

Many thanks for the opportunity to provide feedback on Australia's mutual recognition system. AIRAH welcomes the work the Commonwealth government is doing to improve labour mobility and productivity through this review.

AIRAH is a leading association for professionals working in HVAC&R building services, with many engineers and technicians among our 4,500-strong membership. Accordingly, our responses to the consultation questions cover the treatment of both professional engineering registration and trade licensing under mutual recognition schemes.

To support our industry, we run the AIRAH Professional Engineer Register (APER) – the only professional accreditation program catering specifically to mechanical engineers operating in HVAC&R building services. AIRAH is an approved assessment entity for professional engineers in Queensland, Victoria, the ACT and Western Australia.

We would like to highlight a couple of themes that run through all our responses.

- Many of the issues we see in Australia's mutual recognition schemes reflect a lack of harmonisation in registration and licensing requirements. To truly improve labour mobility and productivity, we must have greater consistency between jurisdictions.
- Establishing appropriate scope for registration and licensing regimes will reduce risk for workers and consumers. Registration and licensing frameworks should recognise differences in skill levels for different applications, climate and environment – and these should be incorporated into our mutual recognition system. Registration and licensing should also recognise higher risk work and the higher skill levels needed to do this type of work, potentially through a tiered system.

If you have any questions about our responses, please feel free to reach out.

Mark Vender

Advocacy and Policy Manager

AIRAH

Impact and effectiveness of mutual recognition schemes

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

   Professional engineers

   Not currently. Engineers are getting registered in individual states and have to pay fees in each state, irrespective of mutual recognition. Some applicants report that mutual recognition is the harder path.

   One AIRAH member who runs a small business in NSW, and who is registered and does work in Queensland and Victoria, described their attempt to register for another jurisdiction:

   "We were one of the early appliers to gain the relevant registration. We found the process very challenging with unclear requirements and unnecessary hoops to jump, even though we have some of the highest qualifications and experience in the field and across a number of other states. After numerous attempts to gain the registration, we have given up in the face of what we see as red tape and wasteful process. This is a big loss to national interest to supply local, desperately needed resources and skills to lift our nation."

   Air conditioning and refrigeration trades

   AIRAH supports the comments submitted by the ARC, that mutual recognition is only effective if there is clarity about what work the additional licence covers. Because of inconsistencies between jurisdictions, workers face uncertainty about what they can and cannot do, and what additional licenses are required.

   AIRAH members have reported that mutual recognition for air conditioning and refrigeration trades between Queensland and NSW is working smoothly.

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

   Professional engineers

   Our members report that despite mutual recognition, working across states and territories is expensive.

   One director of an engineering firm in NSW reported that they spend tens of thousands of dollars a year registering staff in different jurisdictions, renewing these registrations, paying for membership of Engineers Australia to be on the National Engineering Register (often required by certifiers in NSW for commercial building classes), and doing continuing professional development activities that are prescribed but not always appropriate.

   Our members report that smaller firms may have just one or two engineers who are registered for signoffs, regardless of who is actually working on each project. This runs counter to the goal of professional registration schemes: to strengthen and build confidence in engineering work.

3. **Does the Mutual Recognition Act, and the processes and policies implemented by jurisdictions in support of the operation of the Act, appropriately manage risks to worker safety and consumer protection?**

   Professional engineers

   No.

   For example, in NSW, engineers only need to be registered to work on class 2, and certain 3 and 9c buildings. But they can use this registration without an interview or proper assessments to work on apartments and hotels in other states.

   Apartments are where the biggest construction issues lie, and where most people can be impacted. NSW needs a registration system for all building classes to close the back door allowing engineers to work on high-risk classes via mutual recognition without proper assessment.

   AIRAH members report that mobility has facilitated a "lowest common denominator" approach where practitioners move to jurisdictions with less rigorous oversight, undermining the high standards of states like Queensland. Mutual recognition should establish a high standard to be achieved, not set the lowest bar.

4. **Which trades, professions and/or sectors have benefitted from mutual recognition schemes?**

   Professional engineers

   Design engineers have not obviously benefitted from mutual recognition schemes. The current system is unwieldy, inconsistent and confusing.

   Air conditioning and refrigeration trades

   AIRAH members have reported that mutual recognition for air conditioning and refrigeration trades between some jurisdictions is working smoothly – for example, between Queensland and NSW.

Implementation and alignment of mutual recognition schemes

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

   Professional engineers

   No.

   For example, the Queensland regulator requires a letter from the original assessment entity. Proof of registration elsewhere should be enough.

   Engineers can register now for WA but can't use mutual recognition until July next year. If they can register now, all mechanisms to do so should be available.

In the ACT, both mutual recognition and automatic mutual recognition are available, depending on the state where the engineer holds registration. For example, engineers registered in Queensland cannot work in the ACT under automatic mutual recognition, as Queensland is not currently participating in the automatic mutual scheme. Likewise, ACT registered engineers cannot work in Queensland under automatic mutual recognition.

AIRAH members have expressed frustration at this lack of consistency.

Air conditioning and refrigeration trades

AIRAH members have reported inconsistencies in how mutual registration is handled across jurisdictions.

For example, one technician with a licence in NSW applied for an equivalent licence in Queensland and was given the same licence, plus an additional plumbing licence class, where other applications were only given the air conditioning and refrigeration licensing class. Another member was able to obtain a NSW licence based on their Queensland licence, but in Victoria they had to do an exam.

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

   Professional engineers

   Registering in each state means time, effort and cost. In some jurisdictions, it is difficult to establish what activities require registration. One member shared their experience in Tasmania, where the regulator pointed to an explanation on the webpage (which they had already reviewed), without providing any additional support. The capacity and disposition to answer questions varies widely across jurisdictions, with some regulators seemingly sealed behind many locked doors, and others very happy to engage.

7. **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?**

   Professional engineers

   The current systems are not harmonised, with significant differences. NSW only covers certain building classes – and no engineering work outside buildings. Victoria requires a specific endorsement to work on buildings. The areas of engineering covered in Queensland are different to other jurisdictions. Western Australia has a tiered approach to registration. AIRAH supports the tiered approach, but the point here is that it is not consistent across the country.

   Current registration schemes are not aligned around CPD and ethics. In NSW, for example, engineers are required to complete continuing professional development, some of which consists of prescribed courses at a basic level run by TAFE NSW, at significant expense.

Another example that has been brought to our attention by members is in Queensland, where the QBCC administers an "unlimited" design licence for mechanical HVAC tradespeople. There is no need for the licence holders to have suitable qualifications for doing unlimited design. This is engineering work. Allowing unqualified people to do it leads to non-conformances in buildings.

Air conditioning and refrigeration trades

Different licensing frameworks exist across different states and territories, and in some cases there is a complete absence of licensing for high-risk air conditioning and refrigeration work. This leads to extra costs and complication for business working across borders. AIRAH supports a nationally consistent definition of restricted electrical work for HVAC&R trades, including defining what tasks can be performed, as well as supervision requirements. This should be aligned to competency and risk.

Overlaid onto this patchwork of licensing frameworks is the national ARCtick licensing scheme, which focuses on environmental protection by ensuring that scheduled refrigerants are handled by licensed and competent trades. Despite the ARC's work to align state and territory requirements with its scheme, there are still gaps when it comes to certain refrigerants. Natural refrigerants such as carbon dioxide, ammonia and hydrocarbons, as well as fluorinated refrigerants, such as HFOs, are not covered by the ARCtick scheme, or by most local licensing systems.

The landscape of requirements is so confusing that a dedicated project is underway to map them across Australia. This project is being run by Powering Skills Organisation, the Jobs and Skills Council responsible for the electrotechnology training package.

The experience of industry navigating mutual recognition arrangements

8. **In what specific ways do current mutual recognition arrangements impede or create barriers to the movement of workers, contractors or firms?**

   Professional engineers

   Engineers and contractors are not encouraged to work across state lines due to state registration costs, as well as the time required to confirm the requirements.

   Air conditioning and refrigeration trades

   AIRAH members have reported that work in other states is often subcontracted to workers with local licences. Others have reported that some experiences with mutual recognition – notably between Queensland and NSW – are working well.

9. **Is it easy to find information regarding eligibility, processes, and mutual recognition requirements for workers and employers? How clear is this information? Is help available to navigate the process?**

   Professional engineers

States have information available on their own websites, but the requirements are not always clear until an engineer applies. In Queensland, there is no process other than to contact the authority, as it is done on a case-by-case basis.

A one-stop-shop for mutual recognition systems would save time and increase certainty for professional engineers.

Air conditioning and refrigeration trades

The landscape of requirements and mutual recognition processes is difficult to navigate. It is so complicated that a dedicated project is currently underway to map the systems across Australia, as mentioned above.

10. **Are requirements to notify regulators when working interstate imposing a barrier to mobility? Do regulators receive sufficient information on interstate workers? Could the notification process be simplified or improved?**

    Professional engineers

    AIRAH is not aware of a notification system for engineers – they often have to fully register. A national registration scheme would improve certainty and reduce risk for engineers.

11. **How do registration authorities support cross-border mobility?**

    Professional engineers

    In our dealings with state regulators while running the APER program, we have been encouraged to use mutual recognition, but the system often fails our members.

Opportunities to strengthen and streamline licensing arrangements

12. **What are the opportunities to improve the consistency and efficiency of mutual recognition processes across jurisdictions?**

    Professional engineers

    AIRAH supports a single national registration scheme for engineers that is open for interested and capable entities (such as AIRAH) to participate, rather than a scheme that is run by just one body.

    Air conditioning and refrigeration trades

    AIRAH supports the creation of a national portal where mutual recognition could be checked and managed.

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

    Professional engineers

    The national register should be online. Searching current registers is difficult and different for each state. There is an argument for not only providing a look-up facility, but also for

providing a listing of registered engineers working in each jurisdiction, their branch of engineering and their assessment entity.

AIRAH supports the development of a national, real-time skills and competency register to replace the current paper-based mutual recognition system. This system should track not just a licence or registration, but specific endorsements for high-risk work and regional environmental expertise.

One issue AIRAH has encountered is connecting our own system with state systems. We do not have an automated system for confirming that someone who has been assessed by us actually gets registered afterwards.

Air conditioning and refrigeration trades

AIRAH supports the creation of a portal where users can verify the licences of particular trades. The ARC's "look for the tick" website is a good example of how this system can improve consumer safety and support businesses.

14. **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?**

Professional engineers

AIRAH supports a national registration scheme that involves appropriate engineering bodies to assess and accredit engineers.
Benefits would include:

- Constant and common requirements across all jurisdictions, including consistent registration fees
- A single process instead of many (reducing time and effort)
- Single cost instead of multiple costs
- Bringing other states where registration is not required into line
- Providing a single register for engineers, clients and administrators etc.
- Supporting better renewal and management processes
- Ensuring common quality, CPD and training requirements
- Incorporating common alternative pathways for pre-Washington Accord engineers
- Eliminating multiple registration fees across different jurisdictions, saving engineering firms up to80% on fees based on currently participating states.

Air conditioning and refrigeration trades

AIRAH supports a nationally harmonised approach to trade registration and licensing. This should establish air conditioning and refrigeration as a trade of its own, separate to electrical and plumbing, and be based on standards of competency and sphere of operation. It should include a separate contractor/business licence as required.

Within this framework, risk-based tiers of licencing should be established for working on different types of refrigerants and systems.