

AETT Program

Response to Advanced Entry Trades Training (AETT) Program

**Department of Employment and Workplace
Relations**

October 2025

Executive Summary

The National Electrical and Communications Association (NECA) welcomes the opportunity to provide feedback on the parameters of the proposed Advanced Entry Trades Training (AETT) Program. NECA is the peak body for the electrotechnology sector, representing more than 6,500 businesses and over 344,000 licensed electricians across Australia. Our members are central to delivering the safe, reliable, and efficient electrical and communications services that underpin housing, infrastructure, and the transition to renewable energy.

NECA acknowledges the Australian Government's commitment to establish the AETT program to fast-track the qualifications of 6,000 experienced but unqualified workers in residential housing and civil construction. We recognise that, for a number of occupations, this complementary pathway, using recognition of prior learning (RPL) and targeted gap training through TAFEs and other high-quality registered training organisations, can help address pressing workforce shortages.

We also acknowledge the Department's clarification that this program is not intended as an apprenticeship or traineeship, but rather as a complementary pathway to build the supply of qualified workers to the industry. NECA supports the principle of ensuring that skilled individuals are provided with appropriate recognition and formal qualifications in industries where licensing frameworks permit such pathways.

However, we must emphasise that **the inclusion of electrical qualifications within the AETT program poses unacceptable risks to licensing integrity, workforce standards, personal and public safety and infrastructure integrity.**

Submission

1. Electrical Work Requires a Distinct Approach

Electrical qualifications cannot be treated in the same way as other trades. Unlike many occupations in housing and construction, electrical work is highly regulated, licensed, and directly tied to personal and public safety and infrastructure integrity. No jurisdiction in Australia permits electrical work to be conducted outside a supervised apprenticeship, Overseas Trade Skills Recognition (OTSR) or licensed trade pathway. Creating an alternative pathway via RPL would undermine decades of regulatory effort to ensure the maintenance of personal and public safety and infrastructure integrity.

2. Misalignment of Proposed Qualifications

The proposed list includes post-trade qualifications that cannot be accessed without an unrestricted licence, as well as qualifications of limited relevance to housing construction.

Examples include:

- Certificate IV in Electrotechnology and Certificate IV in Instrumentation, both of which require completion of a Certificate III qualification through an apprenticeship pathway leading to an unrestricted electrical licence.
- Electrical Fitting, which does not provide a pathway to an unrestricted electrical license and, as such, risks misleading participants.

Allowing entry through RPL after as little as two years of experience rewards unlawful and unsafe practice, as unlicensed individuals are not permitted to conduct electrical work outside a formal apprenticeship or OTSR arrangement in any jurisdiction.

3. RPL is unsuitable for Electrical Licensing

In electrical work, an RPL-based system cannot be substituted for the structured Apprenticeship or OTSR systems. Both the electrical apprenticeship and OTSR pathways are underpinned by supervised on-the-job training, recorded through sophisticated electronic profiling systems, on-the-job training through Registered Training Organisations (RTO) and compliance by the Employer, Apprentice and RTO with rigorous and extensive regulatory and safety requirements. Removing this protective systemic scaffolding and permitting RPL-based recognition will expose workers, employers, the public and infrastructure to unacceptable risk.

Furthermore, implementation of an RPL-based system would conflict directly with the Australian government's commitment to strengthened national electrical licensing.

NECA Position

NECA supports the policy intent of the AETT program and recognises its potential value for a number of trades and professions in housing and civil construction. For those sectors, the program could make a meaningful contribution to addressing skills shortages while ensuring individuals are provided with structured training to achieve relevant qualifications.

However, the electrical industry must be treated differently. The apprenticeship and OTSR pathways, with their inherent structures to ensure competency and safety, must remain the only pathways to an unrestricted electrical license. Any attempt to include electrical qualifications under the AETT model risks undermining the very objectives of national licensing reform currently being pursued.

Recommendations

NECA recommends that the Department:

1. Confirm the removal of all electrical qualifications from the AETT program until comprehensive consultation is undertaken with employer groups, unions, regulators, and the Powering Skills Organisation.

2. Reaffirm the apprenticeship and OTSR models as the only pathways to unrestricted electrical licensing in Australia.
3. Ensure that the AETT program settings recognise the distinct nature of the electrical occupations, and that RPL-based pathways are inappropriate for these sectors.
4. Continue to engage NECA and other members of the National Construction Industry Forum in the design of program parameters, to ensure alignment with industry's workforce needs and regulatory, legislative and safety obligations.

Supplementary Comment – Surveying Industry

As a founding member of the Australian Subcontractors Alliance, NECA strongly supports the position advanced by Surveyors Australia regarding the inclusion of CPP41721 – Certificate IV in Surveying and Spatial Information Services and CPP50121 – Diploma of Surveying within the Advanced Entry Trades Training program. Surveyors are critical first movers in the construction ecosystem. Their work in establishing legal boundaries and delivering precision set-out data is indispensable to residential housing and civil infrastructure projects. Without this foundational expertise, no project can commence, and the risks of costly error and delay are materially increased. The inclusion of these qualifications in AETT is, therefore, a strategic necessity to address workforce shortages in surveying and to secure the integrity of the national construction pipeline.

Through the ASA, NECA has consistently advocated for reforms that strengthen the entire subcontractor supply chain, ensuring all specialist trades and professions are recognised for their role in delivering safe, productive, and timely outcomes. We recognise the acute skills shortages facing the surveying profession and the direct impact this has on the broader housing and infrastructure sectors. Supporting Surveyors Australia's request aligns with the federal government's objective to fast-track qualifications for experienced but unqualified workers in priority areas. It also complements NECA's own advocacy on electrical licensing by reinforcing that workforce development must respect the distinctive requirements of each licensed trade and profession, while ensuring construction projects have access to the skilled labour they cannot progress without.

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