

Queensland Building and Construction Commission and Other Legislation Amendment Bill 2025

Submission No:	10
Submitted by:	Plumbing and Pipe Trades Employees Union Qld
Publication:	
Attachments:	No attachment
Submitter Comments:	



State Development, Infrastructure and Works Committee

Queensland Building and Construction Commission and Other Legislation Amendment Bill 2025

Applicant: *Communications, Electrical, Electronic, Energy, Information, Postal, Plumbing and Allied Services Union of Australia - Plumbing Division, Queensland Branch (PPTEU QLD)*

Contact: Justin Maxwell, Acting State Secretary (approval level = Queensland Branch)

Email: [REDACTED]

Phone: [REDACTED]

Applicant Submissions:

Digital Licenses and communication

1. The PPTEU QLD supports the principle of reduced red tape for QBCC license holders, as long as appropriate protections for workers, contractors and clients remain.
2. For license holders who are capable of utilising technology, the proposed changes to the QBCC Act and the Plumbing and Drainage Act to enable electronic or digital communication and license cards can be seen to be a worthwhile improvement in process, and to reduce the likelihood of losing a (physical) licence card.
3. However, there remains a substantial number of license holders in Queensland who do not have sufficient technological capabilities who will likely be severely disadvantaged by any mandated shift to digital licensing and communication.
4. We recognise that the Bill merely removes the restrictions preventing the implementation of digital or any alternative to physical license cards, however extensive consultation must be conducted with the industry and license holders directly prior to any implementation of digital-only processes.
5. Physical license cards should continue to be provided in addition to digital license information to avoid the risk of avoidance of obligations under the Act to present license details to an inspector or others when required.
6. Licensees should be provided the option to identify any reasonable grounds to continue receipt of physical license cards and communication in written (non-digital) form.
7. Where the commission does proceed to issue license cards in digital format, penalties should be established for failure of a Licensee to take all reasonable steps to ensure license details can be presented on request in accordance with the Act.

Penalties for Failure to Update Contact Details

8. The Bill introduces a new obligation on license holders to advise the QBCC of any changes to contact details (address, email or phone number) within fourteen (14) days.
9. Failure to adhere to this new obligation may incur a penalty up to 10 penalty units.

10. Whilst we wholeheartedly support the underpinning principle which ensures that license holders can be identified and contactable, the imposition of a strict fourteen (14) day timeframe and up to \$1660 penalties on such updates is unreasonable, particularly given that it may (in some cases) take longer than 14 days in order to obtain replacement postal, email or phone numbers.
11. As noted above, many license holders do also have limited technological capabilities and are likely to be disproportionately represented (and punished) as a result of this new obligation.
12. The obligation to provide updated contact details should be amended to reflect more reasonable timeframes, and due consideration provided to license holders who are not as technologically capable.
13. Education and advice to all license holders identifying these new obligations and potential penalties must be provided prior to implementation, and when any new licenses are issued.
14. We propose that the timeframe for notification at **s 109C (2)** should be amended to '*28 days after the change, or as early as practicable, unless the licensee has a reasonable excuse*'.
15. We propose that the Bill should be amended at Clause 38 to include –

109C-
insert-

- (3) Subsection (2) of this Section shall not apply if the commission has not previously provided reasonable information in a reasonable manner to the licensee regarding the obligations arising from this Section.

Notification of Incidents (Safety and Electrical)

16. The existing regulatory framework ensures that responsible license holders must report all notifiable safety and electrical incidents to the relevant regulators as well as notifying the entity responsible for licensing of tradespersons and contractors (as per s54A of the QBCC Act).
17. This existing regime ensures that informed decisions can be made by the QBCC when considering license applications, actions and investigations and that the QBCC must receive notifications about notifiable incidents.
18. Whilst we support reductions in cost and red tape for license holders, the Bill does not include provisions ensuring that the relevant entities under the Work Health and Safety Act or the Electrical Safety Act must report notifiable incidents to the QBCC, neither does it establish mandatory timeframes for reporting.
19. The omission of existing reporting obligations without ensuring alternative reporting provisions are codified through legislation or regulation presents an unacceptable risk to worker safety, contractors, public safety and industry reputation.
20. Existing information sharing systems between OIR and QBCC – captured under a memorandum of understanding – should be codified, with requirements included obliging relevant regulators to share all relevant details relating to notifiable incidents involving a QBCC license holder with the QBCC within a reasonable timeframe.
21. This is critical to ensure that the commission (QBCC) continues to receive relevant information about safety matters and the outcomes of any associated investigations involving licensees.
22. We propose that the Bill should be amended at Clause 26 to include –

Section 54A-

insert-

- (8) The **relevant entity** under Section 54A(2)(a) and (b) must-
- (a) provide relevant details of a safety matter and associated licensee/s notified under Section 54A(2) to the Commission within 24 hours of receipt of notification; and
 - (b) disclose to the commission any formal findings relating to relevant licensee/s arising from investigations into notifiable safety incidents under this Section.

In summary, whilst we support the intent of efficiency and red tape reduction, adequate safe guards must be enacted to ensure unintended loopholes are not created allowing for safety incidents to go unreported (to the QBCC) or tradespersons to face greater challenges in their dealings with the commission due to technological change.

Further information regarding this submission, if required, can be obtained by contacting our office or via email to [REDACTED].

Yours Sincerely,



Justin Maxwell
A/State Secretary