



New South Wales Government

Better Regulation Office

Governor Macquarie Tower,
1 Farrer Place, Sydney NSW 2000
GPO Box 5341, SYDNEY NSW 2001
T: (02) 9228 5414 F: (02) 9228 4408

BETTER REGULATION OFFICE ISSUES PAPER

LICENSING OF SELECTED OCCUPATIONS

October 2008

Written submissions due 5:00pm Friday, 28 November 2008



MESSAGE FROM THE MINISTER

The New South Wales Government is committed to ensuring that regulation is appropriate, effective and efficient, with the objective of maximising net benefit to the community and minimising regulatory burden and red tape.

The Better Regulation Office assists me in reducing red tape and regulatory burden in NSW. One of the Office's core tasks is to undertake targeted reviews of areas of regulatory concern.

In a recent review of consumer policy, the Productivity Commission identified a number of occupations that require licensing only in New South Wales, or in New South Wales and one or two other States or Territories. As these requirements are not considered necessary in most States and Territories, it is reasonable to question where there is a need for licensing them at all.

Licensing imposes costs on business, governments and consumers. This form of regulation should only continue if a clear net benefit can be identified.

On this basis, New South Wales has committed to review the need to continue licensing these occupations. We will be looking at the regulatory burden imposed on businesses through increased compliance costs, delays in hiring staff and reduced labour mobility. These costs will be weighed up against the benefits of the licensing regimes.

The purpose of this Issues Paper is to seek stakeholder comment on the need for NSW to continue licensing these occupations, with a view to reducing or removing any unnecessary requirements.

I encourage all interested persons to forward their views on the issues raised in this paper and I look forward to the outcomes of this review.

The Hon Joe Tripodi MP
Minister for Finance
Minister for Infrastructure
Minister for Regulatory Reform
Minister for Ports and Waterways

HOW TO MAKE A SUBMISSION

Interested persons are invited to provide written submissions on this Issues Paper.

Please send submissions by email to: tradelicences@dpc.nsw.gov.au

If you do not have access to email, please send submissions to:

The Better Regulation Office
GPO Box 5341
SYDNEY NSW 2001

Phone: 02 9228 5414
Fax: 02 9228 4408

Submissions must be received by **5:00pm Friday 28 November 2008**.

All submissions will be made publicly available. If you do not want your personal details released, please indicate this clearly in your submission.

INTRODUCTION

All States and Territories have agreed to review the need to continue licensing trades that are licensed solely in their jurisdiction or in their jurisdiction and one other. This is part of a process being undertaken through the Council of Australian Governments (COAG) to rationalise occupational licensing across Australia.

In NSW, the licensing regimes for 11 occupations fall into that category:

- entertainment industry agent/manager
- floor finisher and coverer
- kit home supplier
- lift mechanic
- motor vehicle repairer
- optical dispenser
- property inspector (pre-purchase)
- strata manager
- structural landscaper
- venue consultant, and
- wool, hide and skin dealer.

The purpose of this review is to assess the ongoing need for licensing the above occupations. These licences are administered by several Government agencies. The Better Regulation Office is undertaking the review to cut unnecessary regulation.

The Office is seeking the views of stakeholders on a range of matters including the costs and benefits of the existing licensing regimes, any reasons why licensing may be needed in NSW when it is not considered necessary in other jurisdictions, and alternative ways to achieve the objectives of these licensing regimes.

BACKGROUND

Why do we have occupational licences?

The purpose of occupational licensing is to provide customers with a level of protection by assuring that work is performed by suitably qualified service providers. In occupations where there is potential for criminal activity, licensing may be introduced to strengthen law enforcement activities.

Compared to reliance on the generic law, occupational licensing can be targeted at identified problems in specific industries, and the requirements and response activities can be activated and modified relatively quickly.

What does an occupational licence do?

An occupational licensing regime provides that only a holder of a licence may perform the occupation. A licensing regime will often specify educational and professional qualification requirements. In addition, the licensing regime may impose conditions on service providers, specify the tasks that a licensed provider can undertake, prescribe forms of conduct and provide sanctions for breaches of the requirements.

Benefits and costs of licensing

Licensing schemes can provide benefits to consumers by addressing specific market failures:

- asymmetric information – consumers generally have less information and knowledge than service providers about their needs, the services offered and the quality of services provided which can result in an inequality in bargaining power and poor customer choice, and
- externalities – work undertaken by service providers may have implications for public health and safety or other flow on impacts which are not necessarily reflected in the market transaction. For example, in relation to safety, faulty work by a motor vehicle repairer can have negative impacts beyond the individual consumer as it can be dangerous for other motorists. Similarly, faulty work by a builder can have impacts on a person that subsequently buys a house even though they were not involved in the building work.

Licensing schemes provide consumers with information about service providers by clearly identifying the skills that licensees should possess and allowing for the maintenance of public registers of licensees.

Licensing can assure consumers of a person's ability to undertake work in a competent and honest manner by requiring licence applicants to demonstrate evidence of good character and educational and/or technical qualifications. Good conduct is maintained by monitoring the performance of licence holders on an ongoing basis and through the potential for disciplinary action such as suspension or cancellation of licences.

Some licensing schemes include continuing professional development requirements which impose a discipline on licensees to maintain and update their skills.

Some licensing schemes require licensees to hold certain types of insurance. This requirement protects consumers in cases where work is faulty or incomplete. It is appropriate for licensees to hold insurance where consumers are not aware of the risks or where it is not possible for consumers to obtain cost-effective insurance policies.

Through these requirements, licensing schemes can also address risks to the safety of employees and the public and increase consumer confidence in the operation of the industry.

The Productivity Commission has noted that licensing is most likely to confer net benefits where:

- the potential consumer detriment from making a poor choice is significant
- the costs of obtaining product information are high, and/or
- verification of quality by the consumer or other third parties is difficult¹.

However, licensing also imposes a regulatory burden on business. Businesses face compliance costs in applying for and renewing licences and in meeting the requirements imposed on licence holders. Costs are likely to be passed on to consumers in the form of prices that are higher than would be the case if the licensing scheme did not exist.

¹ Productivity Commission, *Report on the Review of Australia's Consumer Policy Framework*, Final Report, 2008, Canberra, Volume 2, page 93

Licensing schemes can create impediments to labour mobility and delays in hiring staff. They may also act as a barrier to entry and limit competition in service provision. In such instances, the outcome is a lower level of choice for consumers and higher prices.

Impetus for this review

In May 2008, the Productivity Commission released its Inquiry *Report on the Review of Australia's Consumer Policy Framework*. The Productivity Commission recommended that the COAG Business Regulation and Competition Working Group should review and reform industry-specific consumer regulation with the objective of identifying and repealing unnecessary regulation, and that the initial focus should be on requirements that apply only in one or two jurisdictions (recommendation 5.1).

On 3 July 2008, COAG agreed to develop a national trade licensing system that will remove inconsistencies across State borders and allow for a much more mobile workforce. Under current arrangements, an array of occupational trades is licensed to varying requirements in each State. COAG's agreement will result in a new national system which will see a national approach to the licensing of a range of economically important trades.

COAG has agreed that the national system will initially apply to the following trades:

- air conditioning and refrigeration mechanics occupations
- building occupations
- electrical occupations
- land transport occupations (passenger vehicle drivers, dangerous goods)
- maritime occupations
- plumbing occupations, and
- property agent occupations.

As part of this process, COAG asked the Business Regulation and Competition Working Group to report on progress towards a review to determine the need to continue licensing trades that are subject to requirements in only one or two jurisdictions.

Occupations included in this review

The Productivity Commission identified occupations that are licensed only in NSW or in NSW and one or two other jurisdictions in its *Report on the Review of Australia's Consumer Policy Framework*². These occupations form the basis of this review. It is noted that the Productivity Commission identified the occupations of quantity surveyor and steel fixer as being licensed in NSW. These occupations are not, however, licensed in NSW and so they are not included in the review.

The COAG Skills Recognition Taskforce has identified another two occupations that are licensed only in NSW: lift mechanics and inbound tour operators who hire out boats for recreational use. Licensing of lift mechanics is included in the review. Licensing of inbound tour operators is currently being reviewed by the Australian Transport Council and is not included in the review.

² See Volume 2, page 94 and Appendix G, page 489.

The review therefore considers the following licences.

Licences to be reviewed

1. entertainment industry agent/manager
 2. venue consultant
 3. floor finisher and coverer
 4. kit home supplier
 5. lift mechanic
 6. motor vehicle repairer
 7. optical dispenser
 8. property inspector (pre-purchase)
 9. strata manager
 10. structural landscaper
 11. wool, hide and skin dealer
-

Each licence is considered separately in this paper.

Stakeholder views

The Better Regulation Office is keen to obtain stakeholders' views on whether the benefits of licensing these occupations outweigh the costs.

Given that most other States and Territories do not license these occupations, views are specifically sought on why it might be necessary to continue licensing these occupations in NSW.

1. **Entertainment industry agent/manager**
2. **Venue consultant**

The Productivity Commission identified NSW as the only jurisdiction to require licensing of entertainment industry agents and managers and venue consultants.

At the end of August 2008, there were 387 licence holders and 538 licences issued including 256 entertainment industry agent licences, 198 manager licences and 84 licences for venue consultants.

Rationale for licensing regime

The licensing regime is established under the *Entertainment Industry Act 1989* and the *Entertainment Industry Regulation 2004*. The principal objective of the Act is to ensure that entertainment industry representatives (defined as 'agents', 'managers' and 'venue consultants') are appropriately qualified and that their dealings with performers and employers are structured so as to protect the performers.

The Act is intended to reduce the risk of unscrupulous, unqualified or substandard persons from representing performers and thereby causing them possible financial detriment, loss of industry advancement and diminished public standing.

How the licensing regime operates

It is an offence for a person to carry on the business of an entertainment industry agent, manager or venue consultant without an appropriate licence. An industry representative may require more than one type of licence according to the range of activities that the person conducts in relation to a performer.

In order to be eligible for an annual licence, an applicant must satisfy a 'fit and proper person' test, be able to conduct a business in the entertainment industry in a proper and business-like manner and exhibit relevant entertainment industry knowledge or experience.

The Act also provides for other forms of regulation including trust accounts, monetary bonds, fee commission setting and industry relationship constraints.

Previous review

The Act was the subject of a National Competition Policy review in 2003. The review examined the requirements for industry licensing, fee payment restrictions and trust accounts/monetary bonds.

The review found there to be sufficient justification for the retention of the regulatory provisions including substantial benefits from:

- the promotion of professional standards amongst service providers
- a reduction in scope for the possible exploitation of young and inexperienced performers
- the provision of a standard for fee payments, and
- the facilitation of transparent business dealings by service providers with performers.

Accordingly, the review did not recommend changes to the Act.

The Better Regulation Office is seeking the views of entertainment industry participants, including performers, entertainment agents and managers and venue consultants on the licensing regime in the Act.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered by the regime and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry representatives, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of performers, and
- whether there are any reasons why it is necessary to license these occupations in NSW when it is not considered necessary to license them in other States and Territories.

3. Floor finisher and coverer

The Productivity Commission has identified NSW as one of the few jurisdictions to require licensing of floor finishers and coverers.

The *Home Building Act 1989* provides that only licensed flooring contractors are able to contract for relevant residential building work in NSW. At present, there are 737 licences issued in NSW (including individual, company, partnership and qualified supervisor licences). These licensed flooring contractors undertake a range of activities, including floor finishing and covering.

The national trade licensing system being developed by COAG will include building occupations, including many of the activities undertaken by flooring contractors.

Rationale for licensing regime

The primary purpose of the licensing regime appears to be to protect the interests of consumers by ensuring that work is undertaken only by qualified persons who hold appropriate insurance.

How the licensing regime operates

For the purposes of licensing, the term “flooring” is a general term referring to the installation of any material permanently installed as a fixture to form a floor. A “fixture” is any fixed or permanently attached item in a building that cannot be removed without causing damage and would remain upon a change in occupancy.

In order to be eligible for a licence, an applicant must satisfy a ‘fit and proper person’ test, meet certain educational requirements and hold appropriate insurance.

The Better Regulation Office is seeking the views of the floor finishers and coverers industry and consumers on the licensing regime under the *Home Building Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

4. Kit home supplier

The Productivity Commission identified NSW as the only jurisdiction to require licensing for suppliers of kit homes.

At present, there are 346 licences issued.

Rationale for licensing regime

The licensing requirement for kit home suppliers was introduced under the *Home Building Act 1989* to ensure that home building work is conducted by licensed persons whether or not the work is conducted on-site or is the result of prefabrication off-site.

The licensing requirement was introduced in response to the collapse in 1990 of a major kit home supplier which resulted in around 700 consumers losing \$2.7 million in deposits. At the time of the collapse, regulations stipulated the maximum deposit that a builder could demand for residential work. However, the requirement did not apply to kit homes offered on a 'supply only' basis (rather than supply and build). Consumers who had paid deposits were not covered by insurance as they were found to have contracted not for 'building work' but only for the supply of materials.

For consumers in the housing market, there is no material difference between buying a kit home and having it built.

On this basis, the primary purpose of the licensing regime appears to be to ensure that consumers are protected against financial loss in the event of business failure.

How the licensing regime operates

The kit home licence is not an occupational licence per se, but rather a business licence. The requirements imposed on kit home suppliers relate to contracts, deposits and information to be given to consumers and are not as rigorous as those for on-site builders. There are no qualification requirements.

The Better Regulation Office is seeking the views of the kit home suppliers industry and consumers on the licensing regime under the *Home Building Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

5. Lift mechanic

The COAG Skills Recognition Working Group has identified NSW as the only jurisdiction in Australia to require licensing of lift mechanics. The *Home Building Act 1989* provides that only licensed lift mechanics are able to contract for residential building work in NSW.

It is not possible to identify the exact number of licence holders as the licence for a lift mechanic is issued under the generic 'mechanical services' licence. It is estimated that the number of licence holders is low.

Rationale for licensing regime

The primary purpose of the licensing regime appears to be to protect the interests of consumers by ensuring that work is undertaken only by qualified persons who hold appropriate insurance.

How the licensing regime operates

The *Home Building Regulation 2004* provides that persons who undertake work on any fixed apparatus such as a lift must hold a 'mechanical services' licence.

The licence for lift mechanic appears to have limited application as a licensed electrician must do the electrical wiring work on the lift.

In order to be eligible for a licence, an applicant must satisfy a 'fit and proper person' test, meet certain experience requirements (a minimum of two years of acceptable practical experience in carrying out the relevant class of work) and hold appropriate insurance. Applicants are required to undertake a Licence Skills Assessment conducted by the Building Industry Skills Centre.

Separate to the licensing regime, the *Occupational Health and Safety Regulation 2001* requires that lifts must be re-registered annually with WorkCover NSW to ensure installation and maintenance complies with the Australian Standard.

The Better Regulation Office is seeking the views of the lift mechanics industry and consumers on the licensing regime under the *Home Building Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

6. Motor vehicle repairer

The Productivity Commission identified NSW and Western Australia as the only jurisdictions to require licensing of motor vehicle repairers.

At present, there are 12,907 licences issued in NSW.

Rationale for licensing regime

The purpose of licensing motor vehicle repairers is to protect consumers by ensuring that repairs to vehicles are undertaken by qualified persons, and also to prevent crime by controlling the disposal of stolen cars and the re-birthing of vehicles.

How the licensing regime operates

The *Motor Vehicle Repairs Act 1980* requires the licensing of all motor vehicle repairers in NSW. The licensing scheme comprises business licensing and occupational licensing.

In order to be eligible for a licence, an applicant must satisfy a 'fit and proper person' test, meet certain qualification requirements (and/or employ tradespeople who meet these requirements) and have sufficient financial resources to carry on the business.

Previous reviews

The licensing requirements were subject to a National Competition Policy Review in 2000 and a further statutory review in 2004. Both reviews found that the net public benefits of the licensing scheme exceeded its costs.

The Better Regulation Office is seeking the views of the motor vehicle repairers industry and consumers on the licensing regime under the *Motor Vehicle Repairs Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

7. Optical dispenser

The Productivity Commission identified NSW as the only jurisdiction to require licensing of optical dispensers.

As at 30 June 2007, there were 1,498 persons registered as optical dispensers in NSW.

Rationale for licensing regime

The primary purpose of the licensing regime appears to be to protect the health and safety of members of the public by ensuring that only qualified persons carry out optical dispensing.

How the licensing regime operates

The Optical Dispensers Licensing Board licenses optical dispensers under the *Optical Dispensers Licensing Act 1963*. Only a licensed optical dispenser may carry out the practice of optical dispensing, although registered optometrists may also carry out this practice where it constitutes the practice of optometry.

In order to be licensed, optical dispensers must hold approved qualifications in optical dispensing and be of good character.

Dispensers are required to renew the licence annually. A licence may be cancelled if the Board finds a dispenser guilty of misconduct in their professional practice.

Previous review

The Act was reviewed in 1993 as part of the Review of Partially Regulated Occupations by the Australian Health Ministers' Advisory Council. The review concluded that optical dispensers should no longer be licensed, and that the Act should be repealed. The Government did not accept that recommendation at that time.

The Better Regulation Office is seeking the views of the optical dispensing industry and consumers on the licensing regime under the *Optical Dispensers Licensing Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

8. Property inspector (pre-purchase)

The Productivity Commission identified NSW as the only jurisdiction to require licensing of property inspectors (pre-purchase). A person who carries out pre-purchase inspections of residential properties in NSW is required to be licensed under the *Home Building Act 1989*.

There are 414 individual licences and 135 corporate (including partnership) licences currently issued by the Office of Fair Trading.

Rationale for licensing regime

The licensing of building consultants was introduced on 1 January 2004 in response to consumer complaints that inspections of dwellings or specialist work should be undertaken by qualified persons.

The primary purpose of the licensing regime appears to be to protect the interests of consumers by ensuring that work is undertaken only by qualified persons.

How the licensing regime operates

The licensing requirement is limited to persons who carry out pre-purchase visual inspections and excludes pest inspections and inspection solely of specialist work (such as plumbing or electrical work).

In order to be eligible for a licence, an applicant must satisfy a 'fit and proper person' test and meet certain qualification requirements. There is no licence fee.

A publicly available online licence check facility enables consumers to check licence information.

The Better Regulation Office is seeking the views of the property inspector (pre-purchase) industry and consumers on the licensing regime under the *Home Building Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

9. Strata manager

The Productivity Commission identified NSW as the only jurisdiction to require licensing of strata managers.

At present, there are 1371 licences issued.

Rationale for licensing regime

Licensing of strata managing agents under the *Property, Stock and Business Agents Act 2002* was introduced as a consumer protection policy.

How the licensing regime operates

A strata agent is a property manager who manages trust funds on behalf on an owners' corporation constituted under the *Strata Schemes Management Act 1996*. Strata managing agents are required to hold a licence issued by the Office of Fair Trading.

In order to be eligible for a licence, an applicant must meet certain educational requirements. Requirements are imposed on the management of trust funds and a range of other matters.

The national trade licensing system being developed by COAG will include property agent occupations. This is likely to include some of the activities undertaken by strata managers.

The Better Regulation Office is seeking the views of the strata management industry and consumers on the licensing regime under the *Property Stock and Business Agents Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

10. Structural landscaper

The Productivity Commission identified NSW and Queensland as the only jurisdictions to require licensing of structural landscapers.

At present, there are 1,912 licences issued in NSW (including individual, company, partnership and qualified supervisor licences).

Rationale for licensing regime

The primary purpose of the licensing regime appears to be to protect the interests of consumers by ensuring that work is undertaken only by qualified persons who hold appropriate insurance.

How the licensing regime operates

The *Home Building Act 1989* provides that only licensed structural landscapers are able to contract for residential building work in NSW. Structural landscaping is a category of residential building work and is defined in the *Home Building Regulation 2004*.

In order to be eligible for a licence, an applicant must satisfy a 'fit and proper person' test, meet certain educational requirements and hold appropriate insurance.

The Better Regulation Office is seeking the views of the structural landscaping industry and consumers on the licensing regime under the *Home Building Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.

11. Wool, hide and skin dealer

The Productivity Commission has identified NSW as the only jurisdiction to require licensing of dealers in wool, hides and skins.

NSW Police licenses 38 corporate and 80 individual dealers in NSW.

Rationale for licensing regime

The licensing scheme was introduced to help prevent criminal activity in the industry. It aims to ensure high levels of fraud-aversion, probity and industry confidence.

How the licensing scheme operates

Only businesses holding a licence may deal in unprocessed wool, hide and skins under the *Wool, Hide and Skin Dealers Act 2004*. Licensed dealers are required to nominate all business and storage premises that will be used for the purposes of dealing. The Act places a duty upon licence holders to refuse and report suspicious wool, hides or skins and to meet certain record-keeping requirements. Licences are free and are renewed every 3 years.

The licensing scheme enables the movement of wool, hide and/or skin to be tracked so as to detect and prevent theft or fraud. The Act also provides police with stop and search powers to examine skins and proof of identity provisions.

Eligibility to hold a licence is subject to stringent criteria and offences for dishonesty, mental incapacity or undischarged bankrupt preclude licensing.

A dealer who is found to be involved in fraud or theft can be forbidden to trade in NSW. However, the dealer cannot be excluded from trading in other jurisdictions. It is noted that NSW is the largest exporter of these materials amongst the jurisdictions.

Previous review

The licensing regime for wool, hide and skin was reviewed in 2004. Stronger measures to help prevent thefts of wool, hide and skins in NSW were introduced at this time. The Act is due to be reviewed in 2009-10.

The Better Regulation Office is seeking the views of the wool, hide and skin dealers industry and consumers on the licensing regime under the *Wool, Hide and Skin Dealers Act*.

In particular, views are sought on:

- the benefits of the licensing regime including the protections offered to consumers and impacts on professional standards in the industry
- the costs of the licensing regime including compliance costs for industry, impacts on labour mobility and competition between service providers
- existing or potential alternative ways to protect the interests of consumers, and
- whether there are any reasons why it is necessary to license this occupation in NSW when it is not considered necessary to license it in other States and Territories.