

**Statutory Review of the
*Building and Construction Industry Training Fund and Levy Collection Act 1990 (WA)***

**Submission of Construction, Forestry, Maritime Employees Union, Construction and
General Division – WA Branch (CFMEU)**

Introduction

1. The CFMEU is the principal union representing workers and their industrial interests in the construction industry in Western Australia.
2. The CFMEU has consistently expressed its concerns about the efficacy and performance of the apprenticeship and VET system in Western Australia. Since the last statutory review of the Act in 2019 (which was undertaken prior to the impact of Covid -19 on the construction industry), the VET system has received unprecedented investment by both Federal and State governments. Prior to this period, the reality was much different. In the construction industry, we heard consistent reports of plummeting apprenticeship numbers or for-profit providers forgoing funding or ripping off students.
3. The Covid-19 pandemic exposed an underfunded, under regulated system negatively impacting apprentices and workers. The pandemic made it clear that a push towards privatisation, the undermining of TAFE and the public provision of vocational education and training, and broader labour market ‘flexibility’, was impacting local jobs – and the future jobs for our kids. Casualisation, sham contracting, an over reliance on foreign labour (which was ultimately restricted due to the pandemic) and a falling public sector workforce were all making it increasingly hard for employers to take on apprentices and generate further skills within our workforce. For many years, training, skilling up and investment in our workforce was not a priority.
4. Decades of reform have focused on tailoring vocational education to benefit business, following the notion that the benefits will trickle down. Group/Registered training organisations (**GTOs & RTOs**), which promised to increase apprenticeship numbers by addressing the unpredictable nature of the industry and finding new employers for apprentices who had lost work, have increasingly become profit focused labour hire. They are competing on price at the expense of quality education and support services. These same organisations are receiving direct funding from both government and the Building and Construction Industry Training Fund (**BCITF**).
5. At the same time, apprenticeships have lost their social status. For many school leavers apprenticeships, traineeships and TAFE are seen as a second-choice option, particularly compared to going to university. Worryingly, individuals that commence university are much more likely to finish their course to completion than their peers who commence an apprenticeship or attend TAFE.
6. So it is in this context that the BCITF operates. We see a more significant role for the BCITF to play in the building and construction industry than just a “cheque book” or a source of money for employers. We want to see the BCITF tackle the structural issues within the VET system in order to meet its objectives and foster a sustainable, more prosperous building and construction industry.
7. We welcome the opportunity to make submissions to the 2024 Review.

Term of Reference 1

Effectiveness of the Board

8. Relationship with industry and effectiveness of communication.
 - a. The CFMEU strongly supports the BCITF and the important role it plays in advancing and developing skills and training within the building and construction industry. Since the 2019 Review, we have supported the BCITF's push to increase awareness of the BCITF and its broader initiatives. We believe that the BCITF has generally succeeded in increasing awareness of its programs and initiatives across the industry. We understand this success has largely been driven by traditional and electronic media investment.
 - b. Notwithstanding the above, we are of view that consultation and communication with organisations such as unions must improve. There have been many instances where the BCITF has implemented programs with little to no consultation with the union movement. The concern is that unions are not considered to be a valued stakeholder. We are unsure if this is a considered approach or an incidental one. Nonetheless, we believe unions offer a unique perspective, a workers' perspective which should be central to the BCITF's decision making.
9. Structure of the Board and its effectiveness in meeting the needs of different sectors in the industry.
 - a. The CFMEU continues to be concerned that with the inclusion of resource industry employer organisations into the structure of the Board, there is a risk that workers' voices such as those from union representatives are diluted.
 - b. We note that no further union representatives were allocated board positions with the most recent increase. It has always been our position that with the inclusion of the resource industry employer organisations, its representation should have come from within the existing pool of associations/organisations in order to maintain balance.
 - c. Otherwise, the Board broadly operates effectively with no substantial change required.
10. Operation of the Board in strategic management of the Construction Training Fund.
 - a. We understand that the BCITF continues to comply with all regulatory and statutory requirements, including the management of risk and development of its strategic plan.
 - b. The CFMEU believes if the BCITF conveyed its strategic plan to industry stakeholders, more effective planning and collaboration could occur across industry. If industry was able to coordinate and plan in conjunction with the BCITF on programs and initiatives, particularly with respect to future BCITF initiatives, industry participants could and would assist in creating awareness across the building and construction sector.
11. Efficiency of the Board in collection of levy and administration of programs.
 - a. Under the Act, the BCITF has specific powers to enforce and recover payment of the Levy through litigation. Further, the Act has a pecuniary/penalty regime to assist in the collection of the Levy. In this context, the CFMEU considers that enforcement and compliance of the Levy is an important but underutilised function of the BCITF.
 - b. For context, the CFMEU is unaware of any prosecutions commenced by the BCITF to ensure compliance by construction participants required to contribute to the Levy. On the basis that it is unlikely that there has been a level of compliance sufficient to warrant

no proceedings being commenced by the BCITF, we believe a direct plan for enforcement with appropriate resourcing should be developed and implemented by the BCITF.

- c. A well-resourced compliance and enforcement program will not only increase funds held by the Levy for distribution, but also increase awareness of the Levy throughout the building and construction industry.

Recommendation 1

The BCITF improve consultation and communication with union stakeholders.

Recommendation 2

Consideration be given to reduce the number of Board members from employer organisations. Otherwise no other structural changes are required.

Recommendation 3

The BCITF communicate and coordinate with stakeholders on BCITF's strategic plan and future initiatives so that stakeholders can assist in creating awareness across industry.

Recommendation 4

The BCITF develop, resource and implement a specific compliance and enforcement program.

Term of Reference 2

Attainment of the objectives of the Act

12. To improve the quality of training.
 - a. The increase in funding opportunities available to for-profit providers (including now for capital assets facilitated by the BCITF), coupled with the creation of more modular, competency-based training has historically, spelled disaster for the VET system. The segmental nature of education has meant the units of competency have become increasingly portable. For-profit providers cherry pick units with the lowest costs and highest subsidy in order to increase their profits. The BCITF undoubtedly feeds into this system by issuing grants and support to non-performing RTOs.
 - b. By way of example, some private providers operate entirely online, offering only the units that a conducted cheaply via the internet at low cost, then send students to TAFE for the more expensive on-the-job style education.
 - c. The structure of government funding means unscrupulous for-profit trainers can maximise their profit by offering low quality cheap education while increasing costs for the TAFE sector. While competency-based training has its advantages and is largely supported by some unions, inadequate requirements for time served and unsatisfactory monitoring and enforcement of educational quality has led to a rise of 'tick and flick' providers rorting government and BCITF funding.
 - d. This creates an environment where it is near impossible for training providers who are providing quality training to compete. This dynamic creates a race to the bottom, with the quality of training the victim.
 - e. It is not only private providers who are profiting. Competency-based training coupled with increased funding to for-profit private providers has also resulted in individual businesses as employers setting up RTOs. Many of these organisations train students solely with skills specific to their enterprise. These kinds of organisations currently

receive BCITF funding. Many of these skills are not transferrable across the building and construction industry or sometimes across companies. This can result in not only employers transferring costs of developing firm specific skills in their business towards taxpayers, the BCITF, apprentices and trainees but also has created a scenario where business actually makes a profit from taxpayer/BCITF money simply through training its own staff. This is a real risk with the inclusion of the resources industry as contributors to the Levy as it seeks funding for more specialised training typically outside of traditional skills and training associated with building and construction.

- f. Whilst significant investment because of government intervention, grants and incentives in response to the Covid-19 pandemic has led to an artificial increase in the number of apprenticeship commencements, as a whole, we have seen a rapid reduction in the quality of education, aggressive and predatory spruiking of courses, and the undermining of the VET system. We have already seen a trend downwards on completions of apprenticeships in the building and construction industry since the height of Covid-19 related investment.
 - g. Further compounding of the problem has been removal of the teeth from many of the regulatory organisations supporting apprenticeships, resulting in little oversight of the quality of education and support for apprentices.
 - h. We are currently not convinced this objective is being met by the BCITF in any meaningful way. We see the BCITF playing a critical role in reversing these trends by improving the quality of training it supports.
 - i. In this context, the BCITF must develop, through research or other avenues, its own metrics and undertake its own due diligence prior to funding allocations in order to drive and improve the quality of training in the State.
13. To increase the number of skilled persons in the building and construction industry.
- a. Whilst we acknowledge the intent of the BCITF in its effort to increase skills in the building and construction industry consistent with the objectives of the Act, we see structural and regulatory impediments either prohibiting or at least restricting the ability for the BCITF to substantially meet this key objective. On this basis, we see a greater role for the BCITF to address underlying and systemic problems stifling a real and sustainable increase in the number of skilled people in the building and construction industry.
 - b. Trade licensing
 - i. A key obstacle for the BCITF in achieving this objective is the unregulated trade licensing environment in Western Australia.
 - ii. By way of background, in Australia trade licensing and registration is a state or territory-based issue. Different states and territories have different requirements for the licensing of trades people. However, across jurisdictions many of Australia's core trades are unlicensed. This is true in Western Australia, with only plumbing and the electrical trade requiring a license to undertake work. In this environment, why would a young person undertake a carpentry apprenticeship in the civil or commercial construction sector at apprentice rates of pay, when they can work as a 'formwork carpenter' in the mining industry with a rate of pay potentially 4 times higher?
 - iii. In addition to improving skills and improving training, trade licensing would also have many benefits and flow on effects to Western Australia's

apprenticeship training. Not only does it improve health and safety standards by ensuring trades people are adequately trained (filtering out incompetent, unsafe and unskilled workers), it also benefits consumers through higher quality services by ensuring the trades people they engage are skilled and experienced.

- iv. Licensing the trades means only those that have adequate education and experience are able to work a particular occupation. This prevents unskilled workers from engaging in work where they have no formal education.
 - v. Licensing of trade occupations protects skilled workers by preventing the undercutting of the wages and conditions of experienced qualified workers by unskilled labour. We have found unqualified labour working in qualified job roles is rife on Western Australian construction sites, with many people working as carpenters who have never undertaken formal qualifications. This can undermine skilled wages and conditions and have negative implications for the apprenticeship system, with many potential apprentices unable to see the benefit of investing time, money and effort into an apprenticeship when they are able to enter the industry without formal qualifications.
 - vi. The undermining of skilled wages also means there is little incentive in terms of future income as compared with simply entering the labour market as an unskilled labourer – diminishing education in Western Australia.
 - vii. To ensure high levels of health and safety in high-risk industries, as well as to ensure adequate incentives and rewards for investing in vocational education, Western Australian trades in the building and construction industry need to be licensed. The CFMEU believes that the BCITF should have a central role in supporting such an initiative in Western Australia.
- c. Apprenticeship wages and conditions
- i. Apprentice (and trainee) pay rates and entitlements, like other forms of employment, are regulated under awards, enterprise agreements and the National Employment Standards.
 - ii. Apprentices receive the same entitlements as other staff, such as annual leave and superannuation and are paid while attending school or TAFE. Pay increases occur incrementally, with a first-year carpenter apprentice earning as little as \$15.65 per hour before tax. By contrast, a young retail worker gets paid significantly more. Our members inform us that it is almost impossible to live on apprentice (award) rates of pay. In fact, one of the common reasons cited for non-completion of an apprenticeship is low pay.
 - iii. In industries where trades are not licensed, many potential apprentices find they can make substantially more money as a labourer in the mining industry than an apprentice; the difference between the wages of a skilled tradesperson and a labourer is not sufficient to entice them into completing an apprenticeship.
 - iv. This is particularly the case in Western Australia, with the allure of mining sector construction employment. There continues to be a significant “pull” dynamic from the apprenticeship or VET system and other construction sectors such as the commercial construction sector to the mining industry. The dynamic was one of the key reasons for the relatively recent inclusion of the mining industry into the Levy.

- v. The BCITF must consider the impact of low wages and conditions in the sector as a key obstacle to meeting the objective of increasing the number of skilled people in the industry. In this regard, the BCITF must investigate this issue in order to effectively advance this objective.
- d. Changes to the nature of work and the impact on apprenticeships, skills and training.
 - i. Deregulation of the broader labour market and increased flexibility has led to an increased number of West Australian workers facing precarious and insecure work. From an Australian perspective, over 2 million workers are engaged on casual contracts, with many others engaged through labour hire or hired as independent contractors (ABNs), particularly in the trades.
 - ii. Combined with additional changes such as reduced role of the public sector in large scale projects and changing social perceptions of trade workers, the changing structure of the labour market has contributed to a decline in training and apprenticeship numbers.
 - iii. Subcontractors, or “subbies” work as independent contractors under their own ABN for one or more companies or higher-level contractors. While some of these arrangements are for legitimate purposes, we estimate that in the building industry up to 46 per cent of working in the construction industry are on sham contracts.
 - iv. The growth of the ‘subbie’ and sham contracts has had broad negative implications for employment in the construction industry, for the effective delivery of BCITF funding initiatives as well as the wider economy. The increased reliance on ABN workers has undermined the systems that have historically fostered the training of apprentices. This has occurred through both the dismantling of crews of workers, where an employer would engage a team of employees – including apprentices; as well as reluctance of ABN workers to commit to the long-term training of apprentices when there is uncertainty as to what work is available going forward.
- e. The BCITF’s support for migration agreements
 - i. We understand that the BCITF is currently assisting the Department of Training and Workplace Development (**DTWD**) in developing a statewide Designated Area Migration Agreement (**DAMA**). We suggest that support for the DAMA, which provides the framework for foreign workers to enter the State to work in the building and construction industry, comes at the cost of local workers and new entrants to the industry.
 - ii. We witness on current state government infrastructure projects, workers engaged through the “On Track” training programs (funded by the BCITF), are undermined by workers engaged through the DAMA or some other visa arrangement.
 - iii. The CFMEU does not support the BCITF being involved in assisting in facilitating the DAMA as it undermines the training programs it currently invests in.

Recommendation 5

In order to more effectively meet the objective ‘to improve the quality of training’ the BCITF research, develop and implement its own metrics and drive its own due diligence for the purpose of assessing how and where funding is allocated.

Recommendation 6

The BCITF undertake a greater role in addressing underlying and structural impediments to increasing the number of skilled people in the building and construction industry.

Recommendation 7

The BCITF use its resources to research and support the benefits of a trade licensing system in this state in order to determine how it might assist meeting its objectives under the Act.

Recommendation 8

The BCITF immediately ceases assisting the DTWD in the development of the state wide DAMA.

Recommendation 9

The BCITF undertake further investigation, assessment and resource initiatives to counteract the negative impact of low pay and conditions for apprentices on skills and training development in the building and construction industry.

Recommendation 10

The BCITF undertake further investigation, assessment and resource initiatives to counteract the negative impact of the rise labour hire, casualisation and sham contracting on skills and training development in the building and construction industry.

Term of Reference 3**The Need for this Act to Continue in Operation**

14. The CFMEU strongly supports the need for the Act to continue in operation. The BCITF plays a critical role in the building and construction industry in assisting the government and wider community to address skill development and emerging workforce challenges post Covid-19.

Recommendation 11

The BCITF plays a critical role in the construction industry and must continue in operation.

Term of Reference 4**Review the operation of the Act with respect to the resources sector, including four recommendations referred from the 2019 statutory review to this review.**

15. Introduction of a capital value cap.
- a. The CFMEU strongly opposes the proposal to introduce a capital value cap for the purposes of calculating the Levy. Nor do we support applying a tiered levy based on project value.
 - b. Applying a cap is a simply a blunt instrument to reduce the costs and contribution to the Levy by the resource industry. This risks undermining the policy intent of both the Act and the BCITF. Further, a cap has no regard to the capital-to-labour ratio on a given project and fails to consider the skills needed either prior to or during delivery of

that project. For instance, does every project over a cap threshold \$5 Billion have skewed capital-to-labour ratios? Unlikely. Furthermore, we have not seen any evidence that capital value of a given project are driven solely by the high value of imported capital equipment.

- c. One of the central reasons for the inclusion of the resources as contributors to the Levy was to address the long-standing skills drain from sectors that had long contributed to the Levy (such as the civil, commercial and residential sectors), to the mining sector. To put an arbitrary cap on projects contributing to the Levy would be counterproductive to that policy setting.

16. Increase threshold at which the levy applies.

- a. The CFMEU does not support an indexation of the threshold at which the Levy applies. The existing threshold fixed at \$20,000 has been in place for several years and is now entrenched within the industry.
- b. Our approach is and will always be to make the BCITF as expansive as possible to benefit the largest number of construction workers across the industry. Indexation may have a negative effect in reducing the threshold. We would be concerned that any reduction in the threshold would lead to reduced effectiveness of the BCITF.

Recommendation 12

The introduction of a capital value cap must be strongly opposed.

Recommendation 13

Maintain the Levy threshold at \$20,000.

Term of Reference 5

Test six recommendations from the 2019 statutory review noted and for further consideration (Stage 2 legislative change), including four recommendations arising from the 2014 statutory review.

17. Legislative changes to address the current issues with the definition of construction.

- a. Under section 3(1) of the Act, the definition of *construction work*, which critically defines the BCITF's scope, application and operation, is not directly contained within the Act. Oddly, the definition refers to the definition found in the *Construction Industry Portable Paid Long Service Leave Act 1985 (CIPPLSL Act)*. This is problematic for the following reasons:
 - i. A number of long-standing imperfections exist within the CIPPLSL Act definition, in that it is very rigid and exclusionary.
 - ii. The CIPPLSL Act is currently within its review period, with a number of submissions (including from the CFMEU) recommending amendment of the definition. Where amendments are made, these amendments could impact the strategy, operations or scope of the BCITF.
- b. The CFMEU is of the view that a single, broad but bespoke definition should be within the Act. The purpose of that definition should be to capture as much of the construction industry as possible including but not limited to off-site work and shutdown maintenance.

- c. The CFMEU does not support any definitions for exclusion from the Levy to be located in the *Building and Construction Industry Training Fund and Levy Collection Regulations 1991* due to the ease of amendment. It is preferred that definitions are enshrined within the Act where possible.
18. Streamlined definition of resources construction.
 - a. The CFMEU does not agree with the principle to streamline the definition of resources construction, because it is necessarily exclusionary.
 - b. A good example of work that may be at risk of prohibition where a streamlined definition of resources construction is implemented is shutdown maintenance work on established mining sites. To undertake shutdown maintenance work, construction workers are required to erect scaffolding, use EWP's, undertake work at heights or high-risk work, install and use cranes and other plant and equipment in order to construct.
 - c. Further, these workers are usually required to have at least 5 years' experience in the industry, which requires both experience and training – usually by way of tickets and licenses issued by an RTO subsidised by the BCITF. Often these qualifications are obtained during their time working in the commercial or civil construction industries. This is construction work which is currently within the scope of the Levy. It would not be appropriate for this kind of work to be excluded because it fell outside of a definition or was excluded as a result of that process.
19. Exemption for government work.
 - a. The CFMEU does not see any reason for 'government work' to be excluded from the operation of the Levy. For many years, governments including local governments have operated commercial enterprises, engaged in private sector procurement by developing and investing in government infrastructure and construction projects. The skills and resources required for these projects come from the general labour pool within the State. It is reasonable that these organisations contribute to the Levy.
20. Remove 'improve the quality of training' from the Act.
 - a. Some argue that BCITF do not have the capacity to 'improve the quality of training', in that if (for example) an RTO receives TAC or ASQA approval, then from a regulatory perspective, that RTO is providing training in accordance with regulatory requirements sufficient enough for it not to be subject to any prohibitions on the grants it receives, either from the government or organisations such as the BCITF.
 - b. As a major funder of construction training in this State, the BCITF has a significant role to play in ensuring quality and effective training throughout the industry. The CFMEU strongly opposes the removal of this objective within the Act.
 - c. We believe there is appropriate scope for the BCITF to be involved in undertaking research, establishing its own metrics and undertaking its own due diligence for the purposes of allocation of funds only to organisations that deliver quality training. There must be a recognition by the BCITF that "compliant training" is distinct from and wholly different to "quality training".

Recommendation 14

The CFMEU supports a broad but bespoke definition of construction within the Act. The purpose of that definition should be to capture as much of the construction industry as possible including but not limited to off-site work and shutdown maintenance work.

Recommendation 15

A streamlined definition of resources construction work should be opposed.

Recommendation 16

The CFMEU does not see any reason for ‘government work’ to be excluded from the operation of the Levy. The exclusion should be removed.

Recommendation 17

The CFMEU strongly opposes the removal of ‘improve the quality of training’ from the Act.

Term of Reference 6

Consider the benefits of a more diverse construction workforce and assess whether First Nations people participation and gender imbalances in training are being adequately addressed under the Act.

21. Women in construction

- a. Within training and up-skilling programs associated with the construction industry, many of the elements of the previously male-controlled systems of work and vocational education have persisted. Structurally, it is harder for women to enter or remain in trade occupations¹.
- b. Women’s underrepresentation in the trades has changed little since the 1980s². In many trades women face barriers including gender stereotypes, cultural and structural problems, and in many cases even simply a lack of gender appropriate facilities. This under-representation of women in male-dominated industries has been found to impact gender inequality (including gender pay inequality), industry performance as well as the economy at large.
- c. While women make up almost half of Australia’s labour force, they are highly under-represented in the trades with only around 2- 3 per cent active in Western Australia. The under-representation of women in many trades has its roots in education and despite the significant investment during and post Covid-19 which saw an uptick of women training in the trades, we have recently seen a worrying trend downwards, with NCVER estimating that females training in the trades as 30 September 2023 is down 14.6 per cent since the same time last year³. Broadly, for technicians and trades and workers, women make up only about 10 percent of apprentices and traineeships. The proportion of female representation in blue collar trades remains stubbornly low.
- d. The BCITF has sought to increase involvement of women in construction by simply instituting grants in the amount of \$2,000 (approx.) for employers if that employer

¹ Carson, G., (2014), ‘Women’s leadership in the Trades: An overview’, The Encyclopedia of women and leadership in the twentieth century Australia, Accessible at: <http://www.womenaustralia.info/leaders/biogs/WLE0626b.htm>

² Pyke, J., (2014), ‘Affirmative action in training 1987-2008’, The Encyclopaedia of women in leadership in the twentieth century Australia, Accessible at: <http://www.womenaustralia.info/leaders/biogs/WLE0626b.htm>

³ NCVER (2024), ‘Apprenticeships and traineeships 2023 September quarter, accessible at <https://www.ncver.edu.au/research-and-statistics/publications/all-publications/apprentices-and-trainees-2023-september-quarter>

engages a female apprentice, depending on the nominated duration of the training contract. We are not convinced handing out money to participating employers is a sufficient solution to addressing the systemic gender imbalances in the industry in the medium to long term.

- e. Investment needs to be in a co-ordinated way, with the BCITF working with governments, unions, employers, schools and vocational education institutions in addressing negative workplace behaviour and facilitating cultural change. Gender stereotypes need to be challenged through education campaigns and policies and further direct investment to female workers (as opposed to employers) to encourage more women into (and complete) apprenticeships.
- f. Further, the BCITF should consider further investment in programs focussing on the provisions of gender appropriate facilities to be provided in organisations which receive grants or funding. For example, we have heard that some TAFE colleges have not had appropriate facilities for women.
- g. Finally, more significant investment needs to be made to dismantle structural barriers facing women in male-dominated workforces, including programs which assist in access to family friendly working and training environments (e.g. flexible rosters and hours). We see the BCITF playing a more substantial role in supporting these work/training practices.

22. First Nations People

- a. First Nations communities have experienced generations of intergenerational trauma, marginalisation and disadvantage. Accessible and dignified employment in our Indigenous communities is the best opportunity to achieve autonomy and equality.
- b. The construction industry provides important employment and training opportunities for First Nations people, many of whom are members of vulnerable and disadvantaged communities who have faced individual condemnation for structural inequalities. The construction sector is unique in that, to find meaningful and well-paid employment, workers do not need tertiary qualifications or even basic literacy skills. People who have suffered mental health issues, domestic violence, drug and alcohol misuse, or even experience with the criminal justice system can secure dignified employment opportunities. This can make a major contribution to workers rehabilitation, upskilling, social inclusion and an end to intergenerational disadvantage.
- c. In this regard, the BCITF has a more significant role to play than simply that of providing funding or subsidies to participating employers. The BCITF should be playing a central role in understanding the difficulties for First Nations people entering and staying within the building and construction industry through a mixture of awareness campaigns and direct capital investment in First Nation communities.

Recommendation 18

The CFMEU strongly opposes the removal of 'improve the quality of training' from the Act.

Recommendation 19

The BCITF play a more direct role in addressing the barriers for women entering the construction industry outside of direct funding to employers. This could be achieved through awareness campaigns, direct capital investment in female facilities and amenities including childcare for apprentices and new entrants. Detailed research should be developed to inform such a strategy.

Recommendation 20

The BCITF play a more direct role in addressing the barriers for First Nations people entering the construction industry outside of direct funding to employers. This could be achieved through awareness campaigns, direct investment in facilities for First Nations apprentices and new entrants. Detailed research should be developed to inform such a strategy.

Name: Mick Buchan

Position: Secretary

Date: 16 May 2024