



HIA Submission

Implementing carpentry registration and licensing Consultation Paper

Department of Transport and Planning
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Introduction

The Housing Industry Association (HIA) welcomes the opportunity to provide a submission in response to the Implementing carpentry registration and licensing Consultation Paper (Consultation Paper).

HIA represents Australia's residential building industry, including the nation's largest volume home builders, apartment builders, land developers, suppliers and contractors. Our members are responsible for delivering over 80% of Australia's new housing supply each year. Our members are also responsible for renovations, extensions, additions and other building work on existing homes.

Imposing registration and licensing on trades represents a significant impost on these members, further degrading their capacity to deliver homes and other domestic building work. This submission, therefore, is not limited to responding to the Consultation Paper, rather, it addresses more broadly the significant risks that imposing registration and licensing on trades will have on the sector.

Executive summary

The home building sector has been subject to an unprecedented volume of regulatory reform over recent years, much of it rushed, poorly implemented and undertaken with only cursory consultation with industry.

The release of this Consultation Paper on registration and licensing of carpenters with little warning, shortly before the November 2026 Victorian State election and with a limited period for stakeholders to respond, is symptomatic of the precarious state of building reform in Victoria, especially in light of the original enabling legislation being first passed in 2018.

Registration and licensing (regardless of the occupation) imposes significant costs and regulatory burdens on those they regulate and the wider public. They create barriers to entry, stifle innovation and are slow to adapt to changes. Therefore, registration and licensing of building trades should only occur if clear and unambiguous benefits to the public good can be demonstrated. The Consultation Paper fails to make this case.

HIA is particularly concerned that any attempts to rush through registration and licensing of carpenters risks not only imposing long term costs and compliance burdens but will also act to discourage take up of trades as a career pathway whilst driving experienced trade contractors from the industry. These risks are particularly concerning at a time when the residential building sector continues to face significant workforce and affordability pressures.

The Consultation Paper fails to demonstrate why the registration of carpenters needs to be addressed as a priority ahead of other building trades. HIA does not accept the proposition advanced in the Consultation Paper that carpentry work presents a significant risk of defects and non-compliance, particularly where that work is undertaken under the supervision of a registered builder and is subject to mandatory inspections.

The Consultation Paper relies heavily on assertions contained in the Regulatory Impact Statement: Building Amendment (Carpentry Work) Regulations 2024 (RIS Report) to justify the need for registration and licensing of building trades. A close review of the RIS Report, however, demonstrates that these assertions lack clear evidentiary support and/or fail to identify how registration and licensing of trades would effectively address those assertions. These flaws undermine the premise for the registration and licensing of trades.

Repeated attempts to implement the registration and licensing of trades since in 2018 have failed for the simple reason that there is no compelling justification for it. At present, the only key stakeholder in the industry who seems to be actively seeking progress on registration and licensing of trades is the CFMEU.



That is by itself sufficient reason to be very cautious about this matter and the potential for ulterior motives of an industrial nature.

Ultimately, HIA does not consider that a sufficient case has been made for these reforms. Rather than dust off ancient rationales for regulating trade contractors and employees, HIA calls on the government to utilise existing regulatory powers to address any clearly identifiable deficiencies in the work of building trades.

Therefore, we call on the government to remove the provisions relating to the registration and licensing of trades from the *Building Act 1993* (Building Act) as a matter of priority. The 2018 amendments were fundamentally flawed, and the 2021 amendments only made the situation worse. Until this defective legislation is removed it is not possible for any proposals to regulate building trades to proceed in Victoria.

Summary of recommendations

1. The Implementing carpentry registration and licensing Consultation Paper should be withdrawn.
2. The provisions in the Building Act relating to registration of building trades and licensing of building employees must be removed.
3. Building trades contracting directly with the public continue to be required to be registered with the BPC using the existing builder registration system, where the value of the domestic building work is equal to or greater than the value set for a Major Domestic Building Contract.

Housing affordability and productivity

No review of proposed regulatory intervention can be undertaken without considering the impact it will have on housing affordability, productivity and the ability to get homes built.

The residential building industry is already one of the most heavily regulated industries in Victoria. Those in the industry must manage a complex web of national, state, and local laws, regulations and codes ranging from planning, design, environment, health and safety to local authority inspection and certification and a multitude of building, electrical, mechanical, and plumbing processes. Industry participants must also comply with a legislative framework that spans a multitude of issues including licensing, owner-builders, dispute resolution, builders warranty obligations and contractual requirements.

Over the past 18 months the industry has been impacted by an unprecedented amount of regulatory reform including, but not limited to:

- the introduction of the First-Resort Home Warranty Scheme;
- the implementation of minimum financial requirements for builders which continues to evolve;
- early adoption of NCC 2025 compared to the rest of the country;
- prohibitions on future reticulated gas connections and replacement of existing gas appliances;
- expanded rectification and enforcement powers for the BPC;
- new planning system requirements; and
- many Victorian and Commonwealth industrial relations and occupational health and safety reforms.

The industry is also facing increasing costs of construction, in particular, the impact of higher fuel prices on every aspect of building, as well as continuing difficulty accessing skilled trades and apprentices. This will



only be exacerbated by proposed new licensing requirements for apprentice employers, labour hire licensing law changes, and taxation reform.

The cumulative impact of all these changes means that new housing is ever more expensive to build, stretching the ability of home buyers to afford a new home, degrading the ability of builders to remain profitable and prolonging build timeframes which delays the delivery of homes to Victorians.

The recommendations made in this submission are designed to minimise complexity and promote flexibility, without reducing consumer protection, and ensuring that industry's ability (and therefore government's ability) to reach housing targets is not further eroded by regulatory burden and the entanglement of red tape currently plaguing industry.

Why carpentry first?

The Consultation Paper makes a range of propositions that HIA considers are either not supported by the facts on the ground or significantly overstate the risks to building outcomes. These inaccuracies call into question both the rationale for prioritising the regulation of carpenters and the need to progress the consultation process within the proposed timeframe.

Does carpentry represent greater risk?

The primary rationale advanced for prioritising carpenters is that carpentry is complex work that carries a significant risk of defects and non-compliance.

HIA does not dispute that carpentry can involve complex work, requires specialised skills and, where work is defective, may have significant consequences. However, the Consultation Paper focuses on the potential for defects without adequately considering the additional regulatory safeguards or the improvements in the standard of carpentry work in residential construction that have been implemented since recommendations for trade registration were first made in 2018.

The statement conveniently ignores the fact that mandatory inspections for domestic building work include the frame stage, when external and internal wall framing, roof trusses and other structural work is completed. This is the stage at which defective carpentry work is likely to present the greatest risk. It is also most likely to be identified at this time due to the completion of the frame stage being a stage for a builder to claim a progress payment. The frame progress claim is a major milestone in a home building project where builders and owners (or their agents) may have different perceptions on the quality and value of work done.

Ultimately, the registered builder remains responsible for the work performed by trades and employees engaged on their projects. Registered builders have significant legal obligations, together with strong financial and reputational incentives, to ensure that carpentry work is completed correctly and that defects are addressed at an early stage.

In addition, the Building and Plumbing Commission (BPC) has significant powers to inspect building work and require defective or non-compliant work to be addressed. Recent reforms to strengthen buyer protections also provide additional mechanisms for defective and non-compliant work to be identified and rectified earlier.

Accordingly, carpentry work is already subject to multiple levels of oversight, and these existing safeguards substantially mitigate the risks identified in the Consultation Paper.



This is particularly relevant when carpentry is compared with waterproofing and weatherproofing, which are widely recognised as a significant source of building defects. While carpentry work is subject to significant oversight and substantial elements of that work are examined as part of the mandatory frame inspection, the same level of regulatory scrutiny does not currently apply to waterproofing and weatherproofing work.

If the particular trades should be prioritised for additional regulatory intervention on a risk basis, HIA considers there is a stronger case for prioritising waterproofing and weatherproofing than carpentry.

Does carpentry require regulated qualifications and experience?

The other rationale advanced for prioritising carpenters is the absence of minimum qualification or experience requirements for people performing carpentry work. Even if this is accepted as a regulatory concern, the argument is not unique to carpentry. It could equally apply to a range of trade subcontractors and employees who are not currently subject to occupational registration or licensing. It therefore does not, of itself, justify regulating carpenters ahead of developing a holistic approach to trade contractor registration.

While HIA supports efforts to improve industry skills, training and knowledge, the desirability of improving training does not, in itself, establish a case for occupational registration or licensing.

If there are needs to improve the quality or subject matter of trade training these are more appropriately addressed through Registered Training Organisations (RTOs) and the vocational education and training system responsible for delivering trade training. Industry and the BPC already works with TAFEs and other training providers to identify gaps in training, determine the appropriate approach to addressing gaps, and improve course content. There is no reason why this same approach cannot be used in this instance.

It is also important to recognise the substantial amount of skills development that occurs informally in the workplace. Carpentry skills are not acquired solely through formal qualifications. They are also developed through practical experience, mentoring and the transfer of knowledge from experienced builders and tradespeople to the next generation. During the early years of a tradesperson's career, day-to-day supervision and workplace learning are particularly important. A registration framework that focuses primarily on prescribed qualifications risks undervaluing this important component of skills development.

Since the consultation paper has been released there have been media reports containing allegations that qualifications needed to obtain workplace safety licences, and the construction induction card, have been subject to widespread fraud. This follows the well-documented fraudulent activity in building registration that led to former staff at the Victorian Building Authority and registered builders being charged. While the risk of corruption is not by itself a reason to not implement a registration, licensing or other government accreditation scheme the recent history of such regulation in the Victorian construction industry is yet another reason to be cautious. The trade licensing scheme, which would be needed for employment in the construction industry, would be especially at risk of corrupt activity.

For these reasons, HIA does not consider that a sufficient case has been established for treating carpenters as a regulatory priority or for progressing their registration through an accelerated, trade-specific consultation process and call on the government to withdraw the consultation paper.

Recommendation 1

The Implementing carpentry registration and licensing Consultation Paper should be withdrawn.



No demonstrated rationale

Not only does HIA not support the prioritisation of carpenter registration, but we are also of the view that there is no case for the registration and licensing of building trades, with the exception of those that already exist. The arguments outlined above in relation to carpenters apply equally to the registration and licensing of building trades.

Regulatory reforms undermine need for registration and licensing of building trades

The regulatory environment governing the building sector, particularly the domestic building sector, has changed significantly since the original recommendations for registration and licensing of building trades were made.

These changes have included, but are not limited to, the following amendments to the Building Act:

Building Amendment (Enforcement and Other Measures) Act 2017

- enhanced the regulation of builders;
- introduced a standard set of building practitioner classes through regulation, including limited builder classes, and updated qualification requirements for registration;
- introduced the registration of body corporate building practitioners;
- established a register of building practitioners;
- strengthened the regulator's disciplinary and enforcement powers;
- introduced inspections at mandatory notification stages;
- established VBA inspectors; and
- provided for the registration of trade subcontractors.

Building Amendment (Registration and Other Matters) Act 2021

- added the regulation of "building employees" to the objectives of the Building Act;
- strengthened requirements for certain building work to be undertaken by registered building practitioners; and
- enhanced regulation-making powers concerning education, examinations and registration processes.

Building and Planning Legislation Amendment Act 2023

- strengthened requirements concerning proof of insurance;
- enhanced the regulator's information-gathering powers; and
- introduced new powers for the immediate suspension of building practitioners.

Building Legislation Amendment (Buyer Protections) Act 2025

- provided the regulator with stronger powers to order the rectification of defective, non-compliant and incomplete building work;
- changed domestic building insurance to a first-resort scheme, enhancing consumer protection;
- introduced a developer bond scheme for certain residential apartment buildings over three storeys;



- transferred responsibility for the regulation of the *Domestic Building Contracts Act 1995* (DBCA) from Consumer Affairs Victoria to the building regulator; and
- transferred responsibility for building disputes to the regulator.

There have also been significant reforms to the DBCA and the *Building and Construction Industry Security of Payment Act 2002* (SOP Act), which have strengthened protections within the domestic building industry. Additionally, changes to the *Corporations Act 2001* (Cth) over recent years include a range of measures to combat illegal phoenixing activity.

Furthermore, the BPC has undertaken significant cultural and process reforms to address weaknesses identified in its predecessor, the VBA. These changes have increased regulatory oversight of the sector and strengthened the regulator's capacity to identify and respond to poor practices. The Buyer Protection reforms have further expanded the regulator's powers.

Taken together, these reforms mean that the regulatory environment in 2026 is materially different from that which existed in 2018 or 2021. The policy rationale that originally supported amendments to the Building Act to enable the registration and licensing of building trades should therefore not simply be assumed to remain valid.

Registration does not necessarily deliver better outcomes

The proposition that registration and licensing of building trades necessarily makes them more competent, or more likely to comply with regulatory requirements is not supported by evidence.

Compliance and quality outcomes can be achieved through a range of mechanisms, including effective supervision, inspection, contractual obligations, training, education and information campaigns, and as a last resort, enforcement. In many cases, appropriate use of available regulatory and non-regulatory mechanisms within existing frameworks can achieve the desired outcomes without the need for legislative change or the imposition of additional regulatory obligations.

It should be recognised that the registration and licensing of building trades in other jurisdictions such as Queensland, New South Wales and South Australia have not produced better compliance or quality outcomes than in jurisdictions without equivalent requirements.

HIA believes that registration and licensing of building trades increases, rather than diminishes, the risk of public confusion about who may perform particular types of building work. The public is unlikely to appreciate the differences, risking the potential for conflation of the work of a registered builder with that of trade subcontractors.

Therefore, the underlying claim that the registration and licensing of building trades is an effective mechanism to improve the quality of domestic building outcomes must be questioned.

Unfortunately, as previously mentioned there is also the risk of corruption of registration, licensing and accreditation schemes. It is not uncommon for the current vocational training system to be exploited by bad actors, and this can result in registration, licensing and accreditation being compromised. This is especially so with occupations where a government "ticket" is required to carry on a livelihood.

The evidence base requires reconsideration

The Consultation Paper puts significant stock on the recommendations and analysis set out in the RIS Report as justification for continuing to push for the registration and licensing of building trades. However,



as the Consultation Paper itself makes clear, that the RIS Report was never completed nor released for public consultation. A lot of the evidence relied on by the RIS Report relies on historical reports that precede the recent reforms to building regulation identified above, thus bringing into question whether they still hold validity today.

The RIS Report refers to a 2015 Auditor-General's report as one of the primary sources of evidence supporting the registration and licensing of building trades, particularly carpenters. HIA notes that this report is now more than a decade old.

The RIS Report also relies on the VBA's Proactive Inspections Program Activity Report, Q2 2022–23. While this provides more contemporary evidence, industry and the regulator have already responded to many of the issues identified. It is not apparent to HIA how registration of carpenters, or trade subcontractors more generally, would deliver a material improvement beyond the measures already implemented.

Indeed, the proactive inspection program demonstrates that the regulator already has mechanisms available to identify non-compliance and work with industry to improve outcomes. This raises an important question as to whether an additional registration framework is necessary or proportionate.

Rather than rely on pre-reform reports and analysis to justify subcontractor registration and employee licensing, HIA believes a more contemporaneous review is required. During the review consideration should also be given to broader licensing regimes across Australia. Notably, no other jurisdiction considers licensing of employees to be necessary.

Existing accountability mechanisms

The RIS Report also argues that the absence of registration and licensing of building trades creates an accountability gap because the regulator cannot take direct disciplinary action against unregistered building trades. HIA disputes that this constitutes a lack of accountability.

Building trades (including employees) undertaking work for a registered builder operate within an established chain of responsibility. Their work is subject to the oversight of the registered builder and, in practice, may also be supervised by more experienced employees and subcontractors. Registered builders face significant reputational, financial and regulatory consequences if they fail to ensure that work carried out under their responsibility complies with applicable requirements.

This is supplemented by mandatory inspections at specified stages and increasingly rigorous regulatory oversight and enforcement. There is therefore substantial accountability within the existing framework. That accountability is primarily placed at the level of the registered builder, which HIA considers appropriate given the builder's responsibility for the overall delivery and coordination of building work.

In addition, there are existing common law liabilities and other legislation such as ACL and OHS that hold building trades responsible without the need for a licence or registration to be in place.

Requiring building trades to be registered would not necessarily add materially to this accountability.

The RIS Report alleges that registration and licensing is required to enable the BPC to take disciplinary action against building trades. It should be recognised that disciplinary action should not be the primary means of improving industry performance. It is appropriately a measure of last resort. Effective supervision, mentoring, education, inspection and proportionate enforcement are generally more constructive mechanisms for improving building outcomes than creating additional categories of practitioners subject to formal disciplinary processes.



Registration will not address apprentice completion rates

The RIS Report also argues that there is insufficient incentive for skills formation, relying in part on low apprenticeship completion rates. HIA does not consider that this establishes a case for occupational registration or licensing.

There are numerous reasons why apprentices may not complete their training, including:

- relatively low wages and employment conditions;
- cost-of-living pressures;
- unsafe work practices;
- bullying and harassment; and
- alternative employment and career opportunities.

In jurisdictions where licensing of trades exists there is no evidence to suggest that they have higher rates of completion or are immune to the issues outlined above.

If apprenticeship completion is the policy concern, the appropriate response is to address the factors contributing to non-completion. There is no clear basis for assuming that introducing registration or licensing requirements for building trades will address those underlying causes or materially increase apprenticeship completion rates.

Recent National Centre for Vocational Education Research (NCVER) data also indicates improvements in trade apprenticeship completions.

If there is a genuine desire to further improve completion rates, HIA recommends measures such as:

- providing appropriate financial incentives and support to apprentices and their employers or hosts;
- addressing workplace culture, safety and behavioural issues; and
- improving pathways into trades through the secondary education system.

Registration is not a substitute for effective training

The RIS Report and Consultation Paper also suggest that the level of training and experience among trade subcontractors and employees needs to improve and that registration provides a mechanism for achieving that outcome. HIA disputes the proposition that registration is necessary to achieve improvements in skills and training.

As noted previously, addressing any identifiable gaps in training and education should be through the existing vocational training system. Industry bodies such as the HIA, also provide an effective pathway for training and skills development, and should be considered as part of the solution.

It should also be noted that prescribing qualifications and experience through a registration or licensing framework, rather than improving outcomes, can instead impose rigid requirements that may not readily adapt to changes in construction methods, materials, technology and industry practice.

Imposing rigid minimum education and training requirements may also have unintended consequences for existing building tradespeople, many of whom have substantial industry experience but entered their trade before current minimum educational requirements were introduced, or at a time when a different or lower-level qualification applied.



Any regulatory model that requires experienced tradespeople to prove again that they are competent to perform work they have successfully undertaken for many years risks alienating the very workforce the system should be seeking to retain. Faced with additional education, training or assessment requirements, many experienced tradespeople may simply decide that continuing in the trade is not worth the regulatory burden. Others may choose to work in jurisdictions where their skills, qualifications and experience are recognised without unnecessary additional requirements.

Recognition of Prior Learning (RPL) should not be regarded as a viable solution. The RPL process can be complex, time-consuming and burdensome, particularly for subcontractors with limited administrative capacity. Requiring experienced tradespeople to navigate such a process simply to continue undertaking work they are already competent to perform risks creating a regulatory barrier rather than a genuine competency safeguard.

The result could be entirely counterproductive: experienced and competent building tradespeople leaving the Victorian industry at a time when their skills and experience are most needed.

Any registration framework would therefore need sufficient flexibility to recognise the skills and experience of existing tradespeople. However, building this flexibility into the framework would itself increase its complexity, administrative cost and potentially the time required to assess and determine applications. This further raises the question of whether registration represents a necessary or proportionate response to the identified problem.

Skills can also be developed and maintained through mechanisms other than prescribed qualifications, including:

- targeted short courses;
- recognition of prior learning; and
- formal recognition of structured on-the-job training.

Importantly, one of the principal means by which tradespeople develop their skills is through practical, workplace-based learning. Builders, employers, supervisors and experienced tradespeople invest significant time in developing the capabilities of less experienced workers, identifying and correcting mistakes, demonstrating appropriate practices and passing on practical knowledge that cannot always be replicated in a classroom environment.

The absence of an RTO-issued certificate or formal qualification for this workplace-based development should not be taken to mean that meaningful skills formation is not occurring. Claiming that that trade subcontractors and employees lack skills formation because there is no certificate from an RTO or formal qualification at the end of this informal on-the-job training is an insult.

HIA does not believe the case has been made that deficiencies in training and skills are best addressed through the proposed registration of trade subcontractors or licensing of employees. Instead, any deficiencies can and should be addressed through existing mechanism, as well as recognition for the important role played by builders and other employers to skill formation in the sector.

Registration and licensing are industrial relations reforms in disguise

Another challenge with the current legislative framework for registration and licensing of trades is that it is not really about improving the accountability, quality or safety of trades. It is actually about deterring trades from working as independent contractors and instead compelling them to work as employees. This is why the current legal framework would be supported by the CFMEU.



When the enabling legislation was introduced in 2018 there were two levels for regulation of trades. Level one was the introduction of a system for licensing of regulated trades which only allowed them to be engaged to work on a building site as an employee of a registered builder. Level two was the application of the existing system for registration of domestic builders – limited to regulate any trade who wanted to work as a contractor for a registered builder. An obvious example is the DB-L Carpenter builder registration.

The massive problem with level 2 was that it applied a regulation system designed for trades who would work directly for consumers to trades who would only work for registered builders as contractors. This was problematic when the eligibility requirements for being a DB-L include not only business management skills required for obtaining building approvals and working for consumers but also the need to be eligible to purchase domestic building insurance even though a trade working only for registered builders would never need to purchase this product.

HIA identified this significant defect in the legislation, but the government pushed the Bill through Parliament anyway as the 2018 election was approaching. This Bill therefore introduced in building legislation for Victoria a regulatory system for trades that discriminated against a trade who wished to be engaged as a contractor as opposed to a trade who was happy to be an employee.

In 2021 the enabling legislation was amended to introduce a third level – the registered builder subcontractor. This addressed the problem with level 2 designed for trades working for consumers being applied to trades working for registered builders by having the third level. A trade working for a registered builder only needed to be a registered builder subcontractor and the need for eligibility to purchase domestic building insurance was removed. The mistake in the original 2018 Bill was resolved but more complexity added to the law.

The enabling legislation now allows for a trade to hold one or more of three government “tickets”. Only one allows for a trade to work for a consumer but in practice all three could be used to convince a consumer that the trade is “licensed” and able to legally work for them.

More concerning however is the lack of detail, until recently, about what the prescribed requirements for a trade to be eligible to be a licensed trade or a registered builder subcontractor. HIA and many in the industry have always been concerned that the eligibility requirements to be a registered trade would be much more detailed than those to be a licensed employee.

The RIS Report did not include a copy of the proposed regulations which would have prescribed qualifications. The RIS Report does indicate that a business competence qualification will be required though not the qualifications required for a head contractor/builder. This is some comfort if any final version of these regulations were consistent but additional financial and personal probity requirements that do not apply for licensed trades will still make it more difficult for trades to be registered rather than licensed.

Recommendation 2

The provisions in the Building Act relating to registration of building trades and licensing of building employees must be removed.

Single regulatory approach to building trades

HIA does not believe that a sufficient case has been made to justify the complexity and cost of a formal registration and licensing regime for building trades. This does not mean that HIA opposes measures to



improve the quality of building trades, rather, that where improvements can be made there are less costly, less complex and more effective mechanisms available. It is about applying the right regulatory tool to the situation.

We believe that the existing regulatory approach to most building trades is sufficient and that the BPC already has substantial regulatory and enforcement powers to regulate the work of building trades.

As identified above HIA does not usually support any form of additional regulation for building trades where they are employees of a registered builder or are subcontractors, contracting directly with a registered builder for the reason identified above. Where a building trade can be identified as high risk - in that the incidence and severity of defects in work carried out by the trade are high -then a form of occupational licensing for that trade could be established and modelled on the existing systems for high risk trades like plumbers and electricians. Alternately, amendments could be introduced into building legislation to allow for a new occupational licensing system for high risk trades that does not have the deficiencies of the current legislation.

While we support uniform registration requirements for building trades that contract directly with the public, we are of the view that the existing registration requirements are sufficient to accommodate building trades seeking to contract directly with the public, as they ensure consistency and an even playing field.

That is, where a building trade contracts directly with the public, and the value of the domestic building work is equal to the threshold for a Major Domestic Building Contract, the building trade is required to be registered using the most appropriate existing Domestic Building Limited designation.

The existing registration process ensures that consumers are protected through:

- Established minimum education and experience requirements
- Statutory Insurance Scheme cover for building work
- Domestic Building Contract obligations
- Statutory Warranty Obligations

We are also aware of the current capacity constraints within the BPC. Utilising the existing framework requires no changes to the BPC's processes and will allow to focus on embedding other regulatory reforms. In contrast policing and administering a new trade licensing scheme requires significant resources in order to maintain confidence and integrity in the system. This time and cost to government is yet to be properly assessed.

Recommendation 3

Building trades contracting directly with the public continue to be required to be registered with the BPC using existing mechanism, where the value of the domestic building work is equal to or greater than the value set for a Major Domestic Building Contract.