



A revised methodology for the Australian Apprenticeship Priority List

October 2025

Submission to the Consultation on the
Australian Apprenticeships Priority List



Acknowledgement

In the spirit of reconciliation, the ETU acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all First Nations peoples today.

Introduction

The Electrical Trades Union of Australia ('the ETU')¹ is the principal union for electrical and electrotechnology tradespeople and apprentices in Australia, representing more than seventy thousand skilled workers around the country.

For over 120 years, ETU members have trained the next generation of electrical tradespeople, and the ETU is proud to be involved in the operation of registered training organisations around the country, seeing these institutions as a core part of training the next generation of electrical workers that will be critical in delivering our renewable energy future. The ETU has been a key advocate in the evolution of electrical apprenticeships, and their unique blending of on- and off-the-job education. We were a founding member of the Jobs and Skills Council (JSC) for the electrical industry (Powering Skills Organisation) and actively participate in its technical committees. We draw on this experience in our response to this consultation.

Electricians have been in short supply since at least 1981¹ and have been listed as an occupation in shortage on the skills priority list since 2021.² To deliver the renewable energy transformation, Jobs and Skills Australia (JSA)'s *Clean Energy Generation Report* forecasts a shortfall of 42,500 electricians by 2030, expanding to nearly 100,000 by 2050.³ Electrical occupations are already on the APL.

1. What, in your view, should be the core purpose and scope of the Priority List?

The Apprenticeship Priority List (APL) is a tool designed to increase the number of apprentices enrolling in and completing courses in occupations that will support the delivery of national priority objectives. As such, eligibility for the APL should be targeted at occupations which have demonstrated enrolments and completions that are lower than required to achieve these national policy objectives.

2. How should Australia's economic and social equity objectives be defined?

The discussion paper lists a number of government strategies as relevant for assessing the alignment between the Australian Apprenticeships Priority List and the government's policy ambitions. The Integrated Systems Plan, the National Housing Accord and the forthcoming New Energy Workforce Strategy will be crucial for understanding the forecast demand for skills

¹ See, Electrical Trades Union, [Capacity Investment Scheme](#) (Implementation Design Paper, May 2024)

² Jobs and Skills Australia (2023). [Skills Priority List - Historical](#)

³ Jobs and Skills Australia (2023), [The Clean Energy Generation: Supplementary Modelling Report](#), p. 17.

necessary to deliver the renewable energy transformation and should be considered in the compilation of the Priority List.

Beyond this, the discussion paper for this consultation raises several issues that are relevant to skills shortages and apprenticeship incentives but cannot be resolved through adjusting the eligibility gateway because they relate to the value of the incentive or cultural and structural barriers to employment. For this reason, these issues are best addressed through mechanisms other than the APL eligibility methodology.

For example, pre-vocational courses are a crucial entry point into apprenticeships, and in many trades have been found to successfully increase both overall commencement and completion rates. However, at present, apprentice incentives only apply once an apprenticeship starts. With some pre-vocational courses lasting for weeks or even months, this restricts access to those who can complete training while unpaid or who have the capacity to take on work on top of a full-time training load. In male-dominated industries, women tend to enter as mature age apprentices and are less likely to be able to undertake unpaid prevocational programs, impacting their ability to enrol in these trades. For this reason, we recommend making eligibility for the first payment of incentive programs – like the New Energy Apprenticeships Program – align with the commencement of a pre-vocational program that has a direct pathway into an apprenticeship.

Employer and industry non-compliance

The Strategic Review of the Australian Apprenticeship Incentive System found that some employers take on an apprentice for the first year purely to receive the benefit of the hiring incentive, then fire the apprentice and replace them to begin the process again. These apprentices receive minimal on-the-job training and are simply used as a form of cheap labour.

The ETU supports DEWR's recommendation 4.1 from the review to remove eligibility for incentives from employers who have demonstrated non-compliance with workplace laws or that have been confirmed as engaging in 'apprentice churn' or 'apprentice recycling'. Putting this measure in place would create a disincentive for employers to engage in non-compliance and lead to higher completions as more apprentices receive proper training. However, this outcome is contingent on proper enforcement which can be supported by securing right of entry to training facilities for union officials who inform apprentice of their workplace rights and protections from day one of their apprenticeship.

Apprentices are often isolated, inexperienced, and vulnerable to exploitation from employers. It is crucial that experienced industry professionals can provide mentoring and advice to apprentices during training to ensure they are equipped to stand up to exploitation and provide information to regulators that can inform employer eligibility for the APL.

Regarding the exclusion of whole industries with high rates of non-compliance, attention should be given to whether shortages in specific industries are directly caused by employer non-compliance across an entire industry rather among a small portion of employers. This could be assessed through attention to metrics like churn rates across the industry.

Gender imbalances

The electrical trades—like many traditional blue collar trades—is one of the most gender segregated, male-dominated occupations in the Australian workforce.² The percentage of women in the electrical trades has remained stubbornly low for decades. In May 2024, the ABS put the percentage of women in the electrical trades at 4.3%, an increase of only 2.5% in four decades.³ The causes of this problem are multiple, and include cultural issues, such as sexual harassment and gendered expectations of work, and structural issues, such as lack of amenities and protective equipment for women, as well as lack of workplace flexibility.

While there may be a role for targeted incentives to increase diversity in historically segregated occupations, this should be determined *after* an occupation is placed on the APL. Gender segregation is not solely or even predominantly due to a lack of apprentice incentives and must be dealt with through a range of policy tools. As such, weighting eligibility for occupations based on male or female dominated status will add complexity to the eligibility criteria, not address the root cause of gender imbalances, and distort labour markets by allocating labour towards occupations which are not in shortage.

3. To what extent should the Incentive System be able to flex up and down (i.e. quantum and eligibility) in response to shifting economic conditions and how might this be balanced with ensuring objectivity and certainty?

The Apprentice Incentive review notes that trade apprenticeship commencements are pro-cyclical, as employers are more likely to hire apprentices when labour demand is strong.⁴ This suggests that incentives might be more effective at increasing commencements during a downturn, as the incentive will make a larger part of the benefit received by the employer for hiring the apprentice. For this reason, counter-cyclical apprenticeship incentives may have advantages which could be explored, however the benefits would be best captured through flexing up the value of the payment during a downturn rather than varying the eligibility over time. If occupations that intersect with national priorities are in shortage, incentive payments should not be withheld because of business cycles. The scale of our national objectives such as the energy transition and housing construction targets, as well as the timing of our policy goals necessitate significant and immediate policy intervention. For example, the tens of thousands of apprentices that are required to deliver our 2030 targets will need to start training in the next two years, regardless of the macroeconomic conditions over this period.

The decision to prioritise or target incentives in an economic downturn must be made post hoc, not as part of the development of the APL, to ensure that delivering on policy objectives must be prioritised even if the country is not in an economic downturn. This will also create the necessary and desirable policy certainty and transparency to ensure that industry can forecast demand and training capacity to plan intakes accordingly.

⁴ DEWR (2025). Strategic Review of the Australian Apprenticeship Incentive System. p. 70

4. What is the most effective process for identifying and making updates to the Priority List, and at what frequency?

The determination of national occupation shortages and skills requirements to meet government objectives is the role of JSA and the JSCs, and their architecture must be embedded in the development of and regular review of the list. This must include their involvement at the formal review period, which should occur every three years, and JSA and the JSCs must be able to apply for a change to the list if facts change.

5. Should occupations with viable non-apprenticeship pathways have access to incentives?

Apprenticeship incentives should be targeted at apprenticeship pathways as industry standard for apprentices to qualify for employment across employers and sectors to maintain labour mobility.

6. How can the Priority List capture and support new and emerging occupations or apprenticeship pathways?

The JSA and JSC architecture should be included in the methodology for the development of the list. While the list should be subject to regular review periods (see above), JSA and the JSCs should be able to apply for a change to the list when and if the facts change, for example if new and emerging occupations emerge that they determine require support.

7. Should the Priority List have a jurisdictional or regional element to it?

Key bottlenecks that drive regional skills shortages are uncompetitive wages and insufficient capacity in local community services such as childcare and schooling. The optimal policy approach to these challenges is funding these local services to increase regional capacity to take on apprenticeships and attract qualified tradespeople.

8. Should government take a narrower approach to the Priority List to better target incentives to the most critical priorities and shortages?

Apprenticeship incentives *must* be targeted to those occupations that are required to achieve key national policy objectives, taking into account the impact that workforce shortages may have on government ability to deliver on those priorities. Apprenticeship incentives should be targeted at occupations which have demonstrated enrolments and completions that are lower than required to achieve key national policy objectives.

9. Should the Priority List identify different types of occupation shortages (i.e., attraction, completion or retention gaps) so that incentives can be tailored accordingly?

The determination of national occupation shortages and skills requirements to meet government objectives is the role of JSA and the JSCs and should be undertaken separately to the determination of the APL.

10. The current Priority List methodology is focused on OSCA Major Groups 3 (Trades and Technicians) and 4 (Community and Personal Service Workers), should this be expanded to other Major Groups and on what basis?

Apprenticeship incentive eligibility should be agnostic regarding OSCA codes and solely determined by the extent to which occupations have demonstrated enrolments and completions that are lower than required to achieve key national policy objectives.