



3 July 2012

Reference: pm:vp 031207

The Productivity Commissioners
Locked Bag 2 Collins Street East
Melbourne VIC 8003

To whom it may concern,

Re Productivity Commission Draft Report into Performance Benchmarking of Australian Business Regulation: The Role of Local Government

Centroc represents sixteen local government areas and one water authority in Central NSW. This is an area the same size as Tasmania with about half the population and a bigger GDP. Centroc exists to advocate on behalf of the region's communities whilst delivering cost savings and other efficiencies to member councils.

While outside the timeframe for a formal submission to the Productivity Commission Draft Report into Performance Benchmarking of Australian Business Regulation: The Role of Local Government, the Board would like to take the opportunity to congratulate you on the work undertaken and to provide advice that the findings and recommendations are generally in line with member experiences.

Being regional and rural Councils, it is very easy for State and Federal based legislation, regulation and guidelines to overlook the impacts on our communities in particular our businesses.

Of note is the increasing level of risk shedding being undertaken by State and its affect over Local Government and local business. The management of BDouble and High Productivity Vehicle Routes is a recent case in point where Councils must undertake risk assessment of bridges for routes applied for by industry where they may not have the in-house resource to do so.

More recently the issue of risk management in rail corridors has surfaced where again assessment and site risks need to be considered as the maintenance in rail track corridors is considered. Some of our members have over 60 rail crossings and so this becomes material regarding the quantum of risk and safety management required while others have very few meaning they will have to consider how to retain skills and knowledge to manage risk and safety in the workforce when these skills will be needed so rarely.

While regional resource sharing is one approach – another is to resource from the State or Federal level where it is appropriate as in the final analysis it is public monies being spent and where better value for the public purse can be assured from an aggregated approach, this should be undertaken rather than the current practice of “getting it off the State books.”

Our members would be more than happy to provide more advice regarding our experiences should there be ongoing work in this area undertaken by the Productivity Commission or other agency.

Once again congratulations on a significant body of work addressing an ongoing problem for Councils particularly in the rate capped environment of Central NSW.

Yours sincerely,

Cr Phyllis Miller OAM
Chair
Central NSW Councils (Centroc)