



Knowledge Influence Support

CHAMBER OF COMMERCE AND INDUSTRY
WESTERN AUSTRALIA

15 May 2009

Ms C Underwood
Business Regulation Benchmarking - OHS
Productivity Commission
PO Box 1428
CANBERRA CITY ACT 2001

Dear Ms Underwood

Performance Benchmarking of Australian Business Regulation: Occupational Health and Safety

The Chamber of Commerce and Industry of Western Australia (CCI) is the leading business association in Western Australia. It is the second largest organisation of its kind in Australia with a membership of over 5,500 organisations in all sectors including manufacturing, resources, transport, retailing, hospitality, building and construction, finance, communications and community services.

Occupational health and safety legislation is relevant to every business and significant compliance burdens are known to exist. The costs associated with lack of harmonisation, complex requirements and the growth of detailed and prescriptive regulation is becoming increasingly daunting for all businesses.

The Productivity Commission study is timely due to its potential to inform current and future work on national OHS harmonisation particularly in respect to the regulatory framework, the structure and implementation of regulation.

CCI has addressed, in some detail, a number of concerns in respect to regulatory structure and burdens in the following papers which are attached for the consideration of the study:

Regulation and Compliance: A Discussion Paper, November 2006
Submission into the Review of National Model OHS Laws, July 2008

Additionally, CCI participated in the development of, and fully supports, the Australian Chamber of Commerce and Industry's submission to the study.

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I would be pleased to provide further details on any of the matters discussed in the submission and can be contacted on 08 93657591 or email anne.bellamy@cciwa.com

Yours sincerely

Anne Bellamy
Director
Health, Safety and Workers' Compensation