

SUBMISSION TO : *Australian Government Productivity Commission*

SUBJECT: *Business Regulation Benchmarking Stage 2*

DATE: *29TH October , 2007*

FROM : **TORTOISE TECHNOLOGIES PTY. LTD.**

The Information Paper number 2 of October 2007 on this is seeking feedback on the scope, coverage and methodology for gathering and reporting on benchmarking data and information.

It is an assumption made by us that this is required at the macro rather than the micro level, so all our comments will be at the macro level .

SCOPE

On page six (6) of the Information Paper , it is stated that excessive regulatory burdens can arise through :-

" regulation that is not designed, administered or enforced in keeping with established best practice principles "

Presumably the principles referred to here are those promoted by The Office of Best Practice Regulation in their August 2007 handbook , rather than any other set of Best Practice Principles .

Given this, these principles should inform the scope ; it is for those undertaking this research to determine the best form of stakeholder audit to identify regulations that conform to the statement from the Information Paper quoted above .

COVERAGE

There are multiple forms of business activity conducted by electronic commerce, by organisations who may have an " Agent " here to meet various regulatory requirements and undertakings .

These activities and associated requirements and regulations should be covered, along with those businesses and activities that have a more formal presence in Australia.

So that double counting should be avoided as far as possible, groups of enterprises, particularly those who have many forms , e.g., trusts, corporations, partnerships, hybrids, should be separately identified .

METHODOLOGY

Again , the approach of the Office of Best Practice Regulation would seem appropriate and suitable here ; the suggestions in the " boxes" in the Information Paper seem comprehensive , however a times series , showing initial costs, on -going costs, special costs, etc., broken down into entity type, e.g. :-

- sole trader
- partnership
- private company
- non resident corporation

could be very usual to give a multi dimensional portrait of the range of business activities carried out in Australia .

END OF SUBMISSION