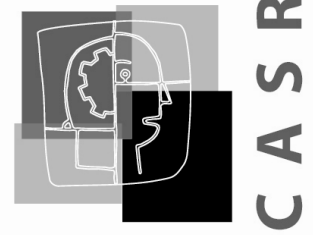


20 August 2008

The Presiding Commissioner
Regulatory Burdens on Business Review
Productivity Commission
GPO Box 1428
Canberra City ACT 2601



Centre for Applied Social Research
School of Global Studies, Social Science and Planning

Dear Mr Woods,

I am writing to express my utmost concern that the draft report from the Inquiry into Regulatory Burdens on Business - Manufacturing and Distributive Trades recommends amendments to the Equal Opportunity for Women in the Workplace Act 1997 (EOWA) to enable biennial, **rather than annual**, reporting by business.

In my view this is to entirely misconstrue the beneficial nature of the legislation. The 'light touch' regulation of the EOWA works to focus the attention of large employers on the advancement of women. I would draw your attention to:

- A research report that highlights how the EOWA can provide the catalyst for employers to address gender equity issues such as paid maternity leave. See Charlesworth, S., Hall, P. and Probert, B. (2005) 'Drivers and Contexts of Equal Employment Opportunity and Diversity Action in Australian Organisations', RMIT Publishing. Melbourne.
- The recent Review of the Victorian Equal Opportunity Act which, amongst other things, considered the issue of the regulatory burden of compliance. (See Equal Opportunity Review Final Report: An Equality Act for a Fairer Victoria <http://www.justice.vic.gov.au>). The Review identified a number of direct and indirect costs of different forms of discrimination to individuals, the community and the economy which need to be weighed against any costs of compliance.

There is a wide range of available evidence that attests to the continuing disadvantage of women in the paid workforce and of the systemic discrimination that exists against women within employing organisations. There is no evidence that the relatively minor imposition on large employers of providing an annual report justifies the further watering down of requirements under the EOWA, itself a pale version of its predecessor the Affirmative Action Act 1986. I would ask that the current draft recommendation be removed from the final report.

Yours faithfully,

Sara Charlesworth
Senior Research Fellow