



14 August 2013

Regulator Engagement with Small Business  
Productivity Commission  
PO Box 1428  
Canberra City  
ACT 2601

Dear Commissioner Mundy

**Re: Regulator engagement with small business study**

Thank you for the opportunity to provide a submission into the Productivity Commission's Draft Report *Regulator Engagement with Small Business*.

CCI is the leading business association in Western Australia and the second largest organisation of its kind in Australia. CCI has a membership of over 8,500 organisations in all sectors of the economy. About 85 per cent of members are small businesses, and members are located in all geographical regions of Western Australia.

CCI supports the recommendations set out in the draft report, which, if implemented, will reduce regulatory burden on small business. In particular, CCI believes that the priority areas for reform are in relation to better engagement outcomes for small business and better processes for delivering regulation, including the following draft recommendations:

Draft recommendation 2.1

The design of regulations should be based on agreed government regulatory impact analysis principles that take into account intended approaches to implementation, monitoring and enforcement and likely impacts of business.

Draft recommendation 3.1

Remove unnecessary complexity in regulatory requirements and guidance material and set outcome based regulatory requirements, and offer detailed guidance on acceptable solutions which would deem the business compliant.

Draft recommendation 5.1

Ensure that information and advice on regulatory requirements is readily available, up-to-date, reliable and provided in brief, clear and user friendly formats, using language that is easy to comprehend.

Draft recommendation 5.2

Streamline business reporting by applying standard business reporting principles and regulators should ensure data and information requests are; no more than they need; are tailored and are not already available by another regulator.

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Draft recommendation 5.3

Ensure there are effective processes for consulting with small businesses, allowing them to provide feedback at low cost on the source and magnitude of compliance burdens, if the regulation is meeting its objectives and any unintentional adverse impacts from the regulation.

Draft recommendation 5.4

Ensure there are appropriate processes for complaints lodgement and avenues to review decisions. Governments should ensure there are low cost mediation services or dispute resolution schemes such as those operated by Small Business Commissioners.

CCI congratulates the Productivity Commission for undertaking this important study, which will form the basis of our ongoing advocacy to government on the need to ease the regulatory burden facing small business.

Yours sincerely

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**Chief Officer, Member Services and Advocacy; Chief Economist**

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