## Racing & Wagering Western Australia (RWWA) response to ERA's draft report into reform of business licensing in Western Australia

RWWA performs licensing of owners, trainers, jockeys and associated persons as well as registration of horses and greyhounds. These licences are issued/processed as part of RWWA's role to control, regulate and manage the integrity of the racing industry. This is a requirement under the "rules of racing" which are non-government requirements. As RWWA funds the racing industry it does not adopt a cost recovery model for the associated fees and charges for licences and registrations. Licence and registration fees can be a "barrier" to entry for racing participants and as RWWA is responsible for the sustainability and health of the racing industry it has decided not to adopt a cost recovery model. The licence format and structure was adopted by RWWA from the respective racing codes in 2003 (when RWWA was formed) and they were not part of any government structure.

RWWA has debated the need to comply with any WA Treasury requirements for its licenses for a number of years and has been provided exemption approval from the relevant minister. These licences are different to normal government business licences and have no economic or environmental impact and do not create a significant regulatory burden.

We therefore believe that the recommendations from the ERA's report do not and should not apply to RWWA's licences. Requirement for RWWA to comply with the recommendations from the report would add further administrative inefficiencies.