



Chamber of Commerce
and Industry WA

Chamber of Commerce and Industry of Western Australia

Submission to the Economic Regulation Authority

Inquiry into Reform of Business Licensing in Western Australia DRAFT REPORT

30 November 2018

Helping business work

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Summary of Recommendations

The Chamber of Commerce and Industry of Western Australia (CCIWA) supports the Western Australian State Government's focus on examining options to reduce the regulatory burden and other economic costs of business licences and to ensure that agencies undertake continuous improvement.

The purpose of this submission is to

- provide feedback on the Economic Regulation Authority's (ERA) Draft Report '*Inquiry into Reform of Business Licensing in Western Australia*';
- respond to the requests for information as outlined in the Draft Report; and
- present some additional options and recommendations to address causes of problems with state government licensing.

CCIWA supports all recommendations in the draft report, with amendment to Recommendation 4, Recommendation 6 and Recommendation 7. This is summarised in the below table:

Draft Report Recommendation	CCIWA Response	Clarifying Comments
Recommendation 1	Support	
Recommendation 2	Support	
Recommendation 3	Support	
Recommendation 4	Support with amendment	Support recommendation but note that: <ul style="list-style-type: none"> • unless it is a consumer issue, regulated parties are best placed to identify issues with the operation of licensing schemes as they experience the issues at the coalface. • CCI suggests that government considers options to get better feedback from regulated parties including businesses, not-for-profits and industry associations on an ongoing basis (CCIWA Subsequent Recommendation 1).
Recommendation 5	Support	
Recommendation 6	Support with amendment	Support recommendation but believe recommendation should go further by establishing a Red Tape Commissioner (CCIWA Subsequent Recommendation 2).
Recommendation 7	Support with amendment	Support, noting that agencies could report to one of the four regulatory teams in the Department of Treasury Economic Policy.
Recommendation 8	Support	
Recommendation 9	Support	

CCIWA Subsequent Recommendations

CCIWA supports Recommendation 6 but believe it could be enhanced by creating a more established feedback loop from businesses and not-for-profits on red tape issues and how these issues can be resolved.

As such, CCIWA considers that Recommendation 6 is more appropriately split into two separate roles:

- 1) identifying problems with licensing and helping to encourage agencies to undertake continuous improvement. This would require consulting with businesses and not-for-profits who experience problems with business licensing at the coalface and meeting with senior executives in agencies who can listen, respond to and fix issues raised on an ongoing basis; and
- 2) actions that fall under the existing regulatory policy and reporting role for the Department of Treasury.

Recommendation 1:

The Government appoints a WA Red Tape Commissioner to gather feedback on red tape issues and work with Western Australia's business community, not-for-profit organisations and government agencies to identify opportunities to cut red tape and improve regulation on an ongoing basis.

The Commissioner could be directed to:

- set up a WA Red Tape Rubbish Bin submission page;
- meet with businesses, not-for-profits and industry associations;
- consult with government agencies and councils;
- report to the Treasurer and publish progress on issues on the Commissioner's webpage.

This would ensure priority areas for licensing reform are regularly identified to expedite improvements to licensing schemes by government, and agencies are supported to develop a culture of continuous improvement in managing licensing schemes and in applying the analytical framework and guidelines for assessing their regulatory schemes described in appendix A.

CCI believes the establishment of a Red Tape Commissioner could be self-funding over the long-term as reducing the burden of red tape on business will in turn reduce associated administrative costs on the Government.

CCIWA has also provided subsequent recommendations at page 13 to address Recommendation 1.

Recommendation 2:

The four regulatory teams in Treasury's Economic Policy Unit acquire the remaining actions outlined in Recommendation 6.

About this Submission

CCIWA is the leading business association in Western Australia and has been the voice of business for more than 125 years. CCIWA represents employer members from across all regions and industries in Western Australia, including local chambers of commerce, industry associations and employers, particularly small and medium enterprises, both in the private and public sectors. Our mission is to make WA the best place to live and do business. For WA to be a major economic hub and a business-friendly city, its licensing and regulation regime must be effective, contemporary, and create the right incentives for government and business.

CCIWA welcomes the opportunity to be involved in the consultation process and provide feedback on the ERA's draft recommendations.

Foreword: Continuous Incremental Improvement

CCIWA commends the ERA and the Government for looking at options to “encourage agencies to treat business licensing schemes as public assets and continually manage and improve these schemes”. CCIWA considers that this work will help agencies, including departments, regulators and councils (often the delegated regulator) to perform their role and help reduce unnecessary costs.

The core job for an agency includes, administering the rules, providing clear guidance and education on the rules to regulated parties, enforcing the rules and ensuring compliance, and reviewing operations and making changes to create efficiencies across all these areas. It should therefore be business-as-usual activity for an agency to seek feedback, review their operations and undertake continuous incremental improvement, just as it is for any other organisation or business.

Government agencies take a variety of approaches. Some agencies are incentivised to review licences and make improvements on an ongoing basis, while other agencies are not. Western Australian agencies have not reviewed around two-thirds of the enforcement, compliance and administration components of licensing schemes in the past five years.¹

When agencies do not receive feedback and make improvements, there can be large economic costs. For example, agencies can impose delays that are not necessary and add to lead times which negatively affects projects. This can harm investment, employment and productivity.

¹ Economic Regulation Authority (2018) *Inquiry into reform of business licensing in Western Australia – Draft Report*. Page 6

Feedback on Request 10: Draft Recommendations

CCIWA is broadly supportive of the nine recommendations put forth in the draft report. Further feedback on each recommendation is provided below.

Recommendation One

CCIWA supports Recommendation 1. Implementing a governance framework will work towards increasing transparency, collaboration, and oversight of all regulatory schemes implemented at a State-level.

Recommendation Two

CCIWA supports Recommendation 2 as it will increase transparency and provide businesses with foresight, so they can adequately prepare for upcoming changes. It will also highlight any potential issues in licensing schemes across different agencies that are intended to fulfil the same objective before the scheme is implemented.

It is recommended that a summary of changes made to business licensing schemes over the last twelve months also be included in each annual report to make it easier for businesses and agencies to have oversight over what changes have already occurred and what are set to occur.

Recommendation Three

CCIWA supports Recommendation 3, however notes that any legislative reform introduced should not be concerned with prescribing any administrative or procedural requirements of licensing schemes (for instance, submitting an application by fax). This ensures that regulatory schemes are outcomes-focussed, rather than practice-focussed, and will not be made redundant by fast-paced technological advancements.

Recommendation Four

CCIWA supports Recommendation 4, however notes that unless it is a consumer issue, regulated parties are best placed to identify issues with the operation of licensing schemes as they experience the issues at the coalface. CCIWA suggests that government considers options to get better feedback from regulated parties including businesses, not-for-profits and industry associations on an ongoing basis (CCIWA Subsequent Recommendation 1).

Recommendation Five

CCIWA supports Recommendation 5. Consolidating all agencies' Preliminary Impact Assessments (PIAs), Regulatory Impact Assessments (RIAs), Consultation Regulatory Impact Statements (CRISs), and Decision Regulatory Impact Statements into one central repository will allow for better collaboration across agencies, enable the BRU to identify any unnecessary duplications and increase efficiency.

Recommendation Six

CCIWA supports Recommendation 6, however it believes this recommendation should go further by establishing a Red Tape Commissioner (CCIWA Subsequent Recommendation 2)

Recommendation Seven

CCIWA supports Recommendation 7, however notes that agencies could report to one of the four regulatory teams in the Department of Treasury Economic Policy.

Recommendation Eight

CCIWA supports Recommendation 8 and believes the proposed review should critically assess the regulatory impact and compliance costs to the business community as a priority and if the scheme is achieving its intended outcome.

Recommendation Nine

CCIWA supports Recommendation 9. Given that there are almost two million State Government business licences currently on issue (excluding vehicle registrations and drivers' licences)² and over 700 different licensing schemes³, this review should be conducted as a matter of priority. The focus of the review should be on ensuring whether these regulatory instruments remain relevant in contemporary WA by critically assessing if the regulation is over-stringent, outdated, or unnecessary.

Feedback on Request 1: What are the Causes of Problems with State Government Business Licensing

Most areas of regulation were implemented with the intent of achieving a public interest, such as safe food and a safe workplace. Businesses agree with these public interests and must meet regulated standards on an ongoing basis to operate. Public agencies play an important role in administering the regulation on behalf of the State.

Businesses identify red tape as an unnecessary and excessive burden that is imposed on regulated parties by either the regulation itself or the way it is administered by public agencies, which does not achieve a public interest.

Some businesses discuss specific problems with business licensing and processes with other local businesses and industry groups, with agencies, in local and national media and in submissions and correspondence to

² Economic Regulation Authority (2018) *Inquiry into reform of business licensing in Western Australia – Draft Report*. Page 10

³ Ibid.

Ministers. There are four related key themes in the examples provided by business, across most areas of regulation:

- (1) there is poor access to information on regulatory requirements in plain English. Agencies and regulators do not make the rules sufficiently clear to help regulated parties understand the requirements upfront at the outset of an investment decision and do not provide clear and timely guidance to businesses when this is requested;
- (2) there are unnecessary approvals for minor changes such as normal business activities on land that has been designated for commercial, industrial and agricultural uses. These minor changes trigger lengthy and uncertain approval processes;
- (3) agencies and referral authorities repeatedly request further information and excessive levels of detail, consultant reports, documentation and changes to plans. This causes large delays to projects; and
- (4) agencies impose unnecessary and costly requirements (red tape issues).

It is important for somebody who is contemplating a new investment or starting a business to identify how much it will cost and how long it will take to determine – if the investment stacks up, how much finance to acquire or if they are better off investing in another project. An early rejection is helpful because it enables a business to disqualify a project and commit resources to profitable projects.

There is evidence in the red tape issues raised by businesses with the ERA that government agencies can impose unanticipated requirements and delays on businesses. This shows that regulation and its administration can cause uncertainty and create financial difficulties, particularly for small businesses.

There are several causes of these problems:

- (1) Some agencies publish little information on regulatory requirements in plain English for a small business audience. This is a national problem which begins with the level and type of information published on national standards that apply in State law (e.g. national building standards and national standards for a food premises) as well as state regulatory requirements and council requirements in different locations.
- (2) Some legal terminology in legislation, regulation and national standards is not clear. This creates wide scope for interpretation and entrepreneurs, agencies, councils, regulators and consultants interpret the legal terminology differently. This causes inconsistency and different agencies and councils have different requirements.
- (3) Due to poor information on the rules, entrepreneurs seek guidance and advice from agencies on what the rules are and how they will be administered. Further information is often sought but to little avail and at a high cost burden. For example, some regulators state that it is against policy to provide information and advice and the regulatory process requires businesses to apply for a licence or planning permit (after they have invested in a site) and pay a fee and go through the approval process.

- (4) As a result, there is an overreliance on lengthy approval processes that require agencies to consider each business in detail after it has invested in a commercial or industrial site, with the scope of a decision and its timeframe unclear. Councils and referral authorities repeatedly issue requests for further information, which is the planning processes mechanism to request new details, consultant reports and plans, and impose these changes as conditions on a permit. This process causes large delays and imposes new requirements that were not clear or budgeted for up front.
- (5) Agencies and regulators do not have clear rules of engagement for how they will engage with regulated parties and are not held to these.
 - a. Councils are required to report data on planning permit applications, however the data that is reported does not reflect the actual time experienced by a business to go through the planning process (up to eight years).
 - b. Departments do not ensure that councils, regulators and referral authorities are accountable for administering requirements consistently.
 - c. There is no dispute resolution mechanism that works satisfactorily to ensure that regulators are held to clear rules of engagement and liable for their actions.
- (6) Cost recovery can provide incentives for councils and agencies to introduce new approval processes and requirements and increase fees. Many agencies provide little transparency around how their cost recovery model operates. There is no incentive for an agency to become more efficient under the current cost recovery arrangement.
- (7) There is no mechanism to gain feedback on problems businesses and not-for-profits experience with business licensing at the coalface and to provide feedback to agency heads who can respond to the issues on an ongoing basis.

In many cases, it is presently within the existing mandate of the heads of agencies and regulators to make incremental changes and fix these issues.

Additional recommendations to address other causes of problems with state government licensing (Request 1) and issues identified in CCIWA's April 2018 submission.

Causes 1-3: Regulatory information is not accessible to the public and regulated parties including small businesses in plain English.

Recommendation 3: Require that agencies and regulators outline rules and regulations in plain English.

Recommendation 4: Undertake legislative reviews (or base reviews) whose purpose is to review key regulatory hotspots or problem areas and outline solutions. This approach could help outline existing rules and regulations in plain English for regulated parties.

Recommendation 5: Require that agencies that bring a submission to Cabinet or draft new regulations must outline the new rules in plain English for the Government's consideration.

Cause 4: Problems with approvals processes including the use of repeated requests for information that cause large delays and inconsistency.

Refer to recommendation 1: clarify the rules in plain English. Clarifying the requirements will help to make the rules clear up-front and cause agencies to impose fewer unanticipated requirements and delays on business.

Recommendation 6: Remove unnecessary approvals for land zoned for business uses (including permitted uses under each of commercial, industrial, agricultural, tourism, and mineral resource uses under the Planning Act).

Recommendation 7: Enable businesses to choose to meet a checklist of requirements when starting a new project that falls within the scope of what the land has been designated for under the *Planning and Development Act 2005*, or to take a site-specific approvals process.

Recommendation 8: If a decision is required, outline the scope and the parameters of the decision and the timeframe for the decision.

Cause 5: Accountability.

Recommendation 9: Provide for clear rules of engagement between agencies and regulated parties. This could follow the approach in the Statements of Expectations in Victoria, where the Minister issues a statement to an agency outlining basic expectations for how an agency will deal with regulated parties. Progress should be measured and regulated parties should be able to provide feedback.

Recommendation 10: Agencies publish clear information on the range of time it takes a business to gain a licence in the following format: time of application through to completion.

Additional recommendations that will help address multiple issues

In the CCIWA submission in April 2018, CCIWA recommended that Government agencies should evaluate the marginal benefit and marginal costs of new regulatory proposals. Government agencies sometimes request a decision on a matter without providing an appropriate level of information to decision makers on costs and options. At present, many regulatory proposals do not go through the Regulatory Impact Assessment (RIA) process, as the Department of Treasury judges the matter is "insignificant". It is not clear on what basis a matter is "insignificant".

Recommendation 11: The Government amend the Cabinet submission template by introducing the following statement:

The expected regulatory costs associated with the introduction of changes within this submission are:

\$XX-YY

**Note that the author of the Cabinet submission should also calculate the expected cost of a head of power that enables a Minister to issue a new Ministerial Order.*

Recommendation 12: An RIA is compulsory for any matter that imposes costs that are over \$2 million, including planning matters.

Recommendation 13: The Government establishes a red tape reduction target. A red tape reduction target and a KPI for senior executives will help to focus the efforts of the Government to reduce red tape.

Recommendation 14: introduce sunset clauses, as per the model in Victoria.⁴

Feedback on Request 2: How Can Government Develop A Culture Of Continuous Evaluation And Improvement

The Government can take several actions to address issues identified in submissions to the ERA and government agencies regarding (1) the lack of continuous improvement and (2) other causes of problems affecting stakeholders.

Key problem: Government agencies are not incentivised to undertake continuous improvement.

The two essential criteria for an organisation and its agents to undertake continuous incremental improvement, are a feedback loop that gathers feedback from customers that experience problems and a mechanism to respond to those problems.⁵ In this case, the customers or consumers who are at the coalface of licensing schemes are businesses and not-for-profits who experience the problems with the business licensing schemes first-hand. At present:

- (1) there is no ongoing mechanism within government to listen to businesses and not-for-profits who experience problems with business licences at the coalface and identify key issues; and
- (2) there is no mechanism to focus an agency's attention on the problems and unnecessary costs affecting its licensees and changes it can make that ensure both the public interest it oversees and the public interest of jobs and investment, on an ongoing basis.

Successive governments in Victoria have appointed a Red Tape Commissioner to address these issues and help ensure continuous improvement. The Red Tape Commissioner is directed to gather feedback from businesses, not-for-profits and industry groups on red tape issues around Victoria, consult with agencies and provide practical

⁴ <http://www.betterregulation.vic.gov.au/files/d0ea872f-46fb-4782-bfec-a67f00f917a8/Hint-and-tips-for-preparing-a-RIS-for-sunsetting-regulations.pdf>

⁵ Kaye, M., & Anderson, R. (1999). Continuous improvement: the ten essential criteria. *International Journal of Quality & Reliability Management*, 16(5), 485-509.

recommendations for improvement. The Commissioner is appointed by Governor-in-Council and reports to the Victorian Treasurer. This approach has helped:

- identify problems and play back issues to senior executives in government agencies who have the authority to listen to the issues and to change management practices;
- agencies to quickly act on some issues that are within the existing mandate of the agency to fix;
- identify regulatory hotspots for review; and
- identify areas that require regulatory change (which takes longer).

To help ensure agencies undertake continuous improvement, CCIWA recommends that:

Recommendation 1: The Government appoints a WA Red Tape Commissioner to gather feedback on red tape issues and work with Western Australia's business community, not-for-profit organisations and the government agencies to identify opportunities to cut red tape and improve regulation on an ongoing basis.

The Commissioner can be directed to:

- set up a WA Red Tape Rubbish Bin submission page;
- meet with businesses, not-for-profits and industry associations;
- consult with government agencies and councils; and
- identify problems and provide recommendations.

In doing this work, the WA Red Tape Commissioner can perform the two actions described in ERA draft Recommendation 6:

- regularly identify priority areas for licensing reform. This will help to elevate the priority given to improving licensing schemes by government; and
- support and assist agencies in developing a culture of continuous improvement in managing their licensing schemes and in applying the analytical framework and guidelines for assessing their regulatory schemes described in appendix A.

Recommendation 2:

The four regulatory teams in the Department of Treasury's Economic Policy Unit acquire the remaining actions outlined in Recommendation 6.

Further information:

CCIWA believe Recommendation 6 can be emboldened by the establishment of a Red Tape Commissioner as the current actions outlined do not address the need to meet with businesses and not-for-profits which can identify

issues with business licensing at the coalface (and often the solutions) and meet at a senior level with the executives in government agencies, which can act on the issues.

This advisory role can help improve regulator culture and practice so that regulators in state and local government (often the delegated regulator) are business activators and help agencies to improve how they administer the regulations for which they are responsible to reduce red tape. The Commissioner must be resourced and report to the Treasurer or Premier with Cabinet commitment to the work program.

This follows the same model as Victoria (see Appendix A) where the Red Tape Commissioner is appointed by Governor-in-Council and reports to the Victorian Treasurer. Businesses and not-for-profits can contact and make a submission to the Commissioner through the Red Tape Rubbish Bin. The Commissioner is instructed to meet with the businesses and agencies to identify reforms that can contribute to red tape reduction. The Commissioner is also directed to undertake commissioned projects on specific industries or areas and meet with agencies and councils to undertake these projects.

A WA Red Tape Commissioner could leverage CCIWA's network of regional business chambers around Western Australia to run open consultation sessions and gain feedback on red tape issues.

An alternative option is to commission CCIWA to undertake a trial project and consult with businesses and not-for-profits to identify regulatory impediments and barriers to growth in an industry or area of regulation. CCIWA could be engaged to run open consultation sessions, via regional business chambers throughout the State, meet with agencies alongside a representative from the Treasury, and provide a report on the matters for the Treasurer and agency heads.

This approach can be combined with several other approaches to ensure regulatory reform.

Feedback on Additional Requests

Request 3:

A performance checklist and dashboard that is intended to assess whether licensing is the most efficient way of addressing identified problems could ask the following questions:

1. Are the rules accessible in plain English for regulated parties? Is there a clear checklist of requirements that enables a regulated party to read the requirements and demonstrate they meet the requirements?
2. Are policy objectives dealt with by notification? I.e. are policy objectives achieved by requiring a party to notify a regulator that she understands and meets the regulatory requirements and that by commencing activity she will be from this point subject to inspection and enforcement and receive regular updates from the regulator?

3. Is the scope and parameters for any decision and its timeframe clear? Is information likely to be requested by another regulator? Are there time bounds around regulatory approvals and processes?

Request 7:

As outlined in its April 2018 submission, CCIWA recommends that the Government establish a timeline for a review of new licences to ensure that they remain relevant.

CCIWA recommends that the Government introduce sunset clauses, as per the model in Victoria.⁶

Request 8:

Please refer to the analysis of licensing issues on pages 6-7.

Request 10:

CCIWA supports all recommendations in the draft report, with amendment to Recommendation 4, Recommendation 6 and Recommendation 7.

⁶ <http://www.betterregulation.vic.gov.au/files/d0ea872f-46fb-4782-bfec-a67f00f917a8/Hint-and-tips-for-preparing-a-RIS-for-sunsetting-regulations.pdf>

Appendix A - The Red Tape Commissioner Model

Successive governments in Victoria have appointed a Red Tape Commissioner whose role is to work with Victoria's business community, not-for-profit organisations and the Government to identify opportunities to cut red tape and improve regulation. The Commissioner reports directly to the Victorian Treasurer. The Red Tape Commissioner looks for opportunities to:

- identify cuts in red tape that contribute to the Government's 25% red tape reduction target
- improve regulators' dealings with business, including compliance and enforcement;
- cut regulatory overlap and duplicated reporting requirements;
- identify 'hotspots' where regulatory reform efforts can be focused; and
- improve how regulators administer the regulations for which they are responsible.

The Commissioner is appointed by Governor in Council. The role is an advisory role, has no decision-making authority and no role in relation to matters of government policy.

Businesses can contact the Commissioner and submit a red tape issue through the Red Tape Rubbish Bin.⁷ The Treasurer also directs the Commissioner to undertake commissioned projects.

This model leverages the existing capability of an agency to undertake continuous improvement on an ongoing basis and provides it the information to identify issues and fix these issues. The agency or regulator can also choose to seek a decision on what they consider if a matter requires regulatory change, when this is necessary (which takes longer). The Treasurer's interest helps to focus the attention of agency heads.

When agencies identify red tape initiatives, this feeds into the Victorian Department of Treasury and Finance's reporting on each department's contribution to achieving a red tape reduction target.⁸

From mid-2018, the Victorian Government has combined the functions of the Red Tape Commissioner and the Commissioner for Better Regulation (which currently has the responsibility for checking RIAs in Victoria). CCIWA has not recommended this approach as it is a big role for any new WA Red Tape Commissioner to have a clear focus on consulting with businesses and not-for-profits on red tape issues and agencies across WA.

A Red Tape Commissioner must be resourced and report to the Treasurer or Premier with full Cabinet commitment to the work program. The terms of reference for the Commissioner should include evaluation metrics.

⁷ <http://www.betterregulation.vic.gov.au/Red-Tape-Unit/Tell-us-your-red-tape-issue>

⁸ <http://www.betterregulation.vic.gov.au/Red-Tape-Unit>

Appendix B - Red Tape Reduction Can Deliver Large Savings

The Victorian Government has had a target to reduce red tape by 25 per cent. The stock of red tape in Victoria has been valued at \$1 billion. The Victorian Government achieved this target, delivering \$250 million in savings.

The Red Tape Commissioner identified initiatives that contributed towards these red tape savings. These initiatives also delivered efficiency savings for agencies.

Some initiatives that the Red Tape Commissioner identified that are listed on the Red Tape Commissioner's webpage include:

Transport

- Low powered kayaks and canoes
- Transferring bus plates
- Bus driver accreditation
- Medical assessments – commercial bus drivers
- Bus driver accreditation – automatic mutual recognition with NSW
- Over Size Over Mass (OSOM) haulage permits

Building

- Removal of mandatory defects insurance for non-domestic plumbing as a condition of registration
- Swimming pool permits time limits (COMPLETED)
- Caravan parks – Renewal of registration
- Building permit signing – reducing paper-based delays
- Building on battle-axe blocks (COMPLETED)
- Building permit signing – delegated signing

Access to public information

- Accessing flood information required for a building permit
- Land Victoria – accessing valuation information

Liquor and gaming

- Feedback from businesses on liquor regulation and the submission to the review of the *Liquor Control Reform Act 1998*
- Responsible Serving of Alcohol (RSA) training online

- Responsible Serving of Alcohol (RSA) register (COMPLETED)
- Cheque limits (COMPLETED)
- Green line plans (COMPLETED)
- Hard meter reads (COMPLETED)
- Butchers can sell beer and wine but not cider (COMPLETED)
- No cellar door sales licence for Victorian spirit producers

Forms, paperwork and duplication

- Commercial fishing paperwork and recording – technology improvements
- Multiple forms for a property transaction
- Transition to risk-based work plans for quarries
- Police check and Working With Children Check – bus company employees
- Mobile cranes – council approval for use of council roads

Recognition of modern technology

- Mobile cranes – braking systems

Planning

- Rework, unnecessary costs and delays within the Planning Scheme Amendment process
- Remove the need to refer sub divisions that create a road to the CFA for assessment and certification – road access and fire hydrants
- Bushfire Management Overlay Reform: removing the need for referral requirements in areas of lower bushfire risk where an accredited bushfire practitioner has prepared relevant planning permit application documentation
- Bushfire Management Overlay Reform: reviewing planning permit and referral triggers for simple applications
- Bushfire Management Overlay Reform: Minor changes to the current bushfire planning provisions

Earth resources

- Statutory Endorsement of Earth Resources Work Plan (Quarries)

Further information

List of selected Red Tape Commissioner initiatives

- <https://web.archive.org/web/20180411182003/https://www.dtf.vic.gov.au/red-tape-commissioner/red-tape-issue-list>
- <https://web.archive.org/web/20180411190544/http://www.dtf.vic.gov.au/red-tape-issue-list/statutory-endorsement-earth-resources-work-plan-quarries>
- <https://engage.vic.gov.au/smallbizreview>