



26 May 2015

Mr Ben Dolman
The General Manager
Small Business, Competition and Consumer Policy Division
The Treasury
Treasury Building, Langton Crescent
PARKES ACT 2600

Dear Mr Dolman

RE: Competition Policy Review – Comments on Final Report

We are writing to provide comment on the recommendations contained in the Competition Policy Review Final Report (the Report). Standards Australia commends Professor Harper, his panel and the officials who worked together to develop the report and its findings.

Our comments are limited to those matters which are directly related to the impact of Australian and International Standards on the Australian economy.

Recommendation 8

Standards Australia supports the intent of the recommendation. One of the great challenges that we see with technical regulation in Australia is a lack of harmonisation of requirements across jurisdictions.

In the review of regulations, Standards Australia says not only should unnecessary restrictions be removed but necessary regulatory restrictions should be harmonised as part of the same process.

This would involve a level of central coordination, and to the extent that any of the regulatory restrictions involve the use of Australian and International Standards, Standards Australia would welcome the opportunity to contribute, including working directly with the Australian Council for Competition Policy.

Recommendation 10

Standards Australia supports the intent of the recommendation as it relates to reviewing mandatory product standards as a priority area. Standards Australia says that beyond

reviewing the standards, the regulatory frameworks that reference product standards should also be reviewed. This would include a review not only of *which standards* are referenced but *how and for what purpose* they are used.

The upcoming review of the Australian Consumer Law framework provides an excellent opportunity to do this and Standards Australia would welcome the opportunity to contribute, as Australia's peak standards development body and Australian member of ISO (International Organization for Standardization) and IEC (International Electrotechnical Commission).

Recommendation 11

Standards Australia supports the intent of the recommendation.

Prior to the commissioning of the Review, Standards Australia had commenced a process to review its aged standards catalogue, for standards older than 10 years. The process is well underway and we intend to continue with the process.

Our intent is that our catalogue remains relevant and contemporary and adds Net Benefit to the Australian community.

Standards Australia's Net Benefit Assessment takes account of impacts across a range of indicators including competition and economic impact. This is in addition to impact assessment in relation to public health and safety, environmental and social and community.

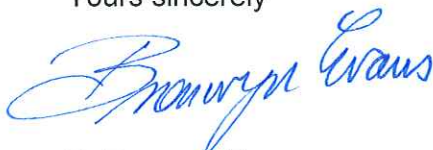
Standards Australia would welcome feedback and input from government as to how we might be able to strengthen our Net Benefit assessment criteria.

Thank you again for the opportunity to comment.

Standards Australia and its members look forward to continuing to work with government to realise the potential to Australian economic life articulated in the Report and its recommendations.

Should you require further information, please do not hesitate to contact Adam Stingemore, General Manager Stakeholder Engagement and Public Affairs by email at adam.stingemore@standards.org.au or by telephone on (02) 9237 6086.

Yours sincerely



Dr Bronwyn Evans
Chief Executive Officer