



Friday, 29 September, 2006

Professor Judith Sloan
Presiding Commissioner
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Professor Sloan,

Performance Benchmarking of Australian Business Regulation

The Property Council of Australia welcomes the opportunity to comment on the proposed study into performance benchmarking of Australian business regulation.

We support the Productivity Commission in its aim to identify areas where the effectiveness of regulation might be measured and assessed.

Areas that could be considered for inclusion in benchmarks include:

- the number of pages of regulation developed;
- a calculation (and report) of the cost of regulations to industry within a 12 month period;
- the amount of money devoted to making regulations compared with the amount spent on educational or voluntary initiatives;
- the proportion of regulations with sunset clauses;
- the number of regulations repealed;
- the number of development applications approved or rejected in a 12 month period; and
- the average time taken to make determinations on development applications, compared with the complexity of those applications.

The Property Council encourages the Commission to develop:

- a standard set of cost-benefit methodologies that are approved for use in regulatory impact assessment; and
- mechanisms to allow the Office of Regulatory Review to reject regulatory impact statements that do not meet proper standards, such as considering alternatives to regulations or appropriate costing models.

The Voice of Leadership

LEVEL 1, 11 BARRACK STREET, SYDNEY NSW 2000
PH 02 9033-1900 - FAX 02 9033-1966
Email info@nat.propertyoz.com.au - www.propertyoz.com.au



Attached are copies of our submission to the Taskforce on Reducing the Regulatory Burden on Business and a study commissioned by the Property Council on improving regulatory impact statements, written by Henry Ergas.

If the Productivity Commission so wishes, we would be happy to arrange for Dr Ergas to meet with you to discuss his findings.

We are also willing to discuss any of the details above or in the attachment further.

In the meantime, Productivity Commission members are encouraged to contact the following Property Council staff, should they require further information:

Peter Verwer
Chief Executive
(02) 9033-1926
pverwer@propertyoz.com.au

Paul Waterhouse
National Policy Manager
(02) 9033-1956
pwaterhouse@propertyoz.com.au

Yours sincerely,

Paul Waterhouse
National Policy Manager