



Department of **Biodiversity,
Conservation and Attractions**
Office of the Director General

Your ref:
Our ref: CEO727/18
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Ms Jenness Gardner
Chief Executive Officer
Economic Regulation Authority
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Attention: Analena Gilhome

Dear Ms Gardner

BUSINESS LICENSING REFORM INQUIRY: SUBMISSION ON DRAFT REPORT

Thank you for the opportunity to provide input on the Economic Regulation Authority's (ERA) draft report on reform of business licensing in Western Australia. I understand you met recently with Dr Fran Stanley, Ms Sophie Moller and Ms Rebecca Carter of the Department of Biodiversity, Conservation and Attractions (DBCA) to discuss the draft report and recommendations. They have advised me that the discussion was productive and wide ranging.

I have reviewed the nine recommendations and the information requests made by the ERA. DBCA has recently completed the development of new Biodiversity Conservation Regulations to give effect to a modern wildlife licensing regime. I am advised that Dr Stanley, Ms Moller and Ms Carter outlined to you several of the challenges faced and successes achieved during this process. I trust this information will provide useful input towards finalising the ERA's report.

Further feedback is provided below.

Recommendation 1: DBCA supports the principle of business licensing schemes being treated as assets that are continuously maintained and improved and aims to achieve this as far as practically possible. However, I note that it is often difficult in a constrained financial environment to dedicate resources to this work when multiple competing, and often more immediate, priorities must be considered.

Recommendation 2: Further to the information above, if agencies are required to report annually on licensing scheme changes and improvements, this reporting would ideally be streamlined, simple and build on existing reporting arrangements. Requiring yet another layer of reporting without recognising and supporting responses to the issues raised through such reporting could increase agencies' administrative burden without providing any benefit.

Recommendation 6: While establishing a Licensing Evaluation and Reform Unit could help drive continuous improvement and reform in business licensing schemes through improving capability in these areas, capacity must also be made available to agencies to enable reviews to occur without reducing that agency's ability to implement its day-to-day business as a result of resource losses.

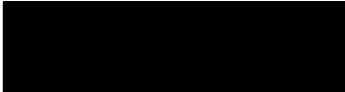


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Requests 10 and 11: It would appear that the recommendations could be implemented as a package. However, DBCA would be unlikely to be able to implement significant or ongoing business licensing reviews and reforms within existing resources without having to divert resources from other priorities.

Please contact Dr Fran Stanley, Acting Executive Director Conservation and Ecosystem Management, on 9219 9370 or fran.stanley@dbca.wa.gov.au if you have any queries regarding this submission.

Yours sincerely



Mark Webb
DIRECTOR GENERAL

4 December 2018