



14 June 2016

Mr. Anthony Lean  
Chief Executive  
State Insurance Regulatory Authority

By email: [wcreq2016@sira.nsw.gov.au](mailto:wcreq2016@sira.nsw.gov.au)

Dear Mr. Lean,

### Consultation on Draft 2016 Workers Compensation Regulation

The NSW Business Chamber (the Chamber) welcomes the opportunity to provide feedback to the State Insurance Regulatory Authority (SIRA) on the proposed action by SIRA to remake, with minor amendments, the *Workers Compensation Regulation*.

As you may be aware, the Chamber is one of Australia's largest business support groups, with a direct membership of more than 19,000 businesses, providing services to over 30,000 businesses each year. Tracing its heritage back to the establishment of the Sydney Chamber of Commerce in 1825, the Chamber works with businesses ranging in size from owner-operators to large corporations, and spanning all industry sectors from product-based manufacturers to service provider enterprises.

Operating throughout a network of offices in metropolitan and regional NSW, the Chamber represents the needs of business at a local, regional, state and federal level, advocating on behalf of its members to create a better environment for industry.

The Chamber is in broad support of the proposed actions to remake the 2010 regulation as set out in the Regulatory Impact Statement (RIS) and Better Regulation Statement.

The single proposed policy amendment relating to the removal of the option for employers to establish shared return to work (RTW) programs makes sense as no application has been made under this clause in the last five years. Provided that this amendment does not impact on an employer's ability to engage a shared RTW coordinator (as highlighted in the RIS), the Chamber would not be opposed to the removal of this clause from the new regulation. The Chamber supports and encourages continued communication and support for employers to advise them of their options when considering and developing a RTW program for their businesses.

The Chamber supports the various machinery amendments proposed in remaking the regulation as they will result in a regulation that is aligned with current legislation, standards and practices.

NSW Business Chamber Limited  
140 Arthur Street  
North Sydney NSW 2060  
Postal address  
Locked Bag 938  
North Sydney NSW 2059  
DX 10541 North Sydney  
t 13 26 96  
f 1300 655 277  
e [businesshotline@nswbc.com.au](mailto:businesshotline@nswbc.com.au)

ABN 63 000 014 504



Invigorating business

[nswbusinesschamber.com.au](http://nswbusinesschamber.com.au)

As stated in previous submissions to SIRA, the Chamber welcomes the efforts of SIRA to simplify and clarify language wherever possible to ensure regulations remain accessible, unambiguous and better understood by stakeholders.

The Chamber has been vocal in emphasising the importance of ensuring that policy proposals appropriately balance the costs and benefits of change. In this regard the Chamber welcomes the Regulatory Impact and Better Regulation statements which accompany the proposed changes. While the Chamber has advocated for improvements to the Government's regulatory impact analysis framework, on this occasion it is accepted that the proposed changes are sufficiently minor in nature such that the degree of analysis contained within these statements is appropriate.

Thank you for the opportunity to contribute to this review. If you wish to discuss any aspect of this submission, please contact [REDACTED] on [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]

**Paul Orton**  
**Director, Policy and Advocacy**