Submission to Productivity Commission
Review of Standards and Accreditation - Comments Relating to Draft Research Report

My previous submission to the Productivity Commission in this matter was made on 21st April, 2006. I will not repeat the comments made in that submission or other information offered as they are now matters of public record and available on the Productivity Commission web site.

Overall I support the Draft Report and Recommendations. My comments should be read in this light.

These comments represent my personal views and should not be taken as representing the views of any organisation other than Educad.

Small Business

I applaud the emergence of some recommendations for more support of small business. I am, however, of the belief that much can be done in the area of small business support.

I note with interest that small business is only represented explicitly on the Management and Business Standards Sector Board. In my area of interest (IT) there is not a lot of representation of small business despite the profound effect some of the standards can have on small business. I suspect that the representation is less than ideal in other areas of standards development. Given that small business accounts for something like 30% of Australia's economic production and employs over 3 million people the level of representation is disappointing.

One of the major issues in this is the somewhat varied level of representation of small business by umbrella organisations. Small business in the IT industry has no effective voice and, in most cases, is totally swamped by the interests of larger organisations, Australian and global, in IT industry forums. There is no national association representing small businesses in the IT sector.

A particular concern with IT is that standards in this field have an effect in all areas of business due to the pervasive nature of IT in business. Large organisations have the ability to draw on expertise from either advisors or internal resources. Small business does not have the same luxury. Given the pervasive nature of IT, support of small business in the area of IT Standards development is critical.

ISO

The Draft Report and Recommendations recommends increased representation in international standardisation activities (Draft Recommendations 6.1 and 6.2) and also makes specific recommendations regarding ISO participation (Draft Recommendations 6.3 and 9.1). I have no problem with the general thrust however I am not convinced that the principles enunciated under the heading "Some principles for future involvement" (P82, Draft Report and Recommendations) are completely reflected in the Draft Recommendations made. I find more clarity in these principles than in the recommendations. I am in complete agreement with the principles.

Stakeholders

In my original submission I raised some concerns about stakeholders in the standards setting process. I am not sure that these concerns have been fully addressed. The Draft Report and Recommendations discuss and define both public and national interest (pp 18 – 20) but there appears to be little discussion of the role of Government entities and representatives within the standards setting process. My impression is that the government is more interested in perceived improvements in the process of government rather than representation of the public interest in the standard setting process. I am not convinced that the Commonwealth is fully meeting its current commitment under Section 6.2 of the MOU.

Thank you again for the opportunity to comment.

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