

Productivity Commission Draft Research Report Standard Setting and Laboratory Accreditation

Submission by:

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I work as a Hazardous Materials, Regulatory Affairs and Chemical Hazard Classification Consultant.

My main concern is how do we fund our technical specialists to participate and ensure we have Standards that are “up to standard”, particularly in our era of performance based regulations. These issues are covered in Chapters 5-Overall assessment and status of Standards Australia, 7-Assessment: the standards produced and access, & 8-Assessment: Governance & Process where these issues are discussed.

Standards Australia needs to have the ability to approach key specialists to participate, review and submit on all aspects of Standards preparation, review and maintenance. As I see it, this needs either a direct funding or an indirect tax concession mechanism.

One suggestion that has particular merit mentioned on page 130 is “a tax concession for costs associated with participation, along the lines of the Research and Development tax concession (Britax Childcare, sub. 91, p. 5)”.

This approach of a tax concession, for lost income for the time taken for Standards work and other financial costs to participate, was also raised at the recent Hazmat 2006 Conference in Melbourne. All technical persons who have heard of this tax concession for unpaid time (lost income) concept since the Conference have agreed with the idea, as this would mean our specialists could again contribute.

The tax concession method means that the whole community, via the Government, is then helping to pay for Standards to be created and maintained. This seems fair.

Background:

In my hazardous chemical field, companies now contract in specialists for specific tasks and do not fund training, or participation in such activities as membership of Standards committees. Many companies no longer see a direct return for such time and no longer allow their specialists to participate, except where an obvious direct return is seen.

Most of our specialists now work in small or one person businesses. This means that the unpaid time to participate in Standards creation must in many cases be paid by, themselves, wives, husbands, partners and children, not receiving an income into their family when Standards work is undertaken. This is unfair.

Performance based regulations should have state of the art input by specialists. We are already at risk of unforeseen issues causing incidents which could have been averted had these specialists been involved.