To whom it may concern ...

The Productivity Commission Draft report on "Standard Setting and Laboratory Accreditation." was recently drawn to my attention.

I particularly refer to recommendation 7.3 and the related section 7.3.

I was a co-author of a number of standards - in particular in my former career in IT I was a co-author of final or earlier drafts of several of the early internet standards (HTTP, URL etc) developed within the IETF, and also of the 3D standard VRML97 which became an ISO standard.

If the approach taken by Standards Australia in providing access to its standards had been taken by the IETF then the internet would never have achieved the growth and scale that it did. The key to the IETF's growth was that standards, and the standardisation process was freely available to all. In particular it was available to the small companies and consultants who provided much of the innovation.

By contrast, ISO's series of "X" standards (X-400, X-25 etc) were closely controlled, and inaccessible and while dominant at the start of the internet have now as good as disappeared from view.

Standards - to be successful need widespread comment, and adoption.
In the days of distribution mechanisms at zero marginal cost - i.e.
websites, there is no reason for there to be a charge for their access.

The process of developing standards usually involves hundreds or thousands of hours of largely volunteer labor, and it is devaluing of that contribution, to hide the result under a cost that in many cases would have prevented those volunteers from accessing the very standards they produced at earlier stages in their careers.

I currently work as an advisor to many small companies working in the areas of sustainability and environmental products. These companies in effect have no access to the standards that they may be required to comply with. Instead of an online search, an instant delivery and a read, they are required to send money, wait, only to find that the standard is irrelevant to their product, or requires reference to another standard. This impedes innovation, reduces compliance and acts as yet another regulation that favors large business over small.

I would suggest that the standardisation process in Australia should be made widely and fully accessible, by the free online publication of all standards.

On a related matter, I would suggest that each standard should include an estimated cost of compliance, and a statement of its impacts on small businesses in terms of the minimum cost to comply.

Mitra Ardron