

20 August 2012

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Dear Mr Radley

ADVICE ON THE ADEQUACY OF REGULATORY IMPACT STATEMENT

Thank you for seeking advice on the Regulatory Impact Statement (RIS) on the proposed *Dangerous Goods (Storage and Handling) Regulations 2012*.

The Victorian Competition and Efficiency Commission (VCEC) advises on the adequacy of RISs as required under section 10(3) of the *Subordinate Legislation Act 1994* (the Act). I advise that the final version of the RIS received by the VCEC on 16 August 2012 meets the requirements of section 10 of the Act.

The VCEC's advice is based on the adequacy of the evidence presented in the RIS and is focused on the quality of the analysis rather than the merits of the proposal itself. **Therefore, the VCEC's advice that the RIS is adequate does not represent an endorsement of the proposal.**

The VCEC notes the *Victorian Guide to Regulations* requires an assessment of the costs and benefits of sunseting regulations compared to a base case without regulations in place. For long-standing regulations, such as those that are the subject of this RIS, it can be difficult to establish a base case for this assessment. In this instance, the information from stakeholder consultations, relevant literature and technical views summarised in the RIS provides a basis for assessing the likely costs and benefits, which has resulted in proposed regulations that would reduce the regulatory burden substantially.

In the interests of transparency, it is government policy VCEC's advice be published with the RIS when it is released for consultation.

If you have any questions, please contact RegulationReview@vcec.vic.gov.au.

Yours sincerely



Jeff Hole

Executive Director

Victorian Competition and Efficiency Commission