



Victorian
Competition & Efficiency
Commission

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22 August 2014

Mr Derek Hollander
Senior Waste Policy Officer
Policy and Regulation Unit
EPA Victoria
200 Victoria Street
CARLTON VIC 3053

Dear Mr Hollander

ADVICE ON THE ADEQUACY OF REGULATORY IMPACT STATEMENT

Thank you for seeking advice on the Regulatory Impact Statement (RIS) on the proposed Environment Protection (Scheduled Premises and Exemptions), (Industrial Waste Resource) and (Fees) Amendment Regulations.

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 the final version of the RIS received by the VCEC on 21 August 2014 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 the RIS is adequate does not represent an endorsement of the proposal.**

In reaching this view the VCEC notes that the analysis in the RIS is based on a range of data sources, including substantial research into surplus tyres in Victoria by the Environment Protection Authority. However, the nature of the problem to be addressed means that there is some uncertainty regarding the actual costs and benefits of the proposal, which will depend on market responses to the proposed regulations and the transition path adopted by affected parties to become compliant.

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

Andrew Walker

Assistant Director

Victorian Competition and Efficiency Commission