2 July 2015

Mr Roger Arwas
Executive Director
Small Business Victoria
Department of Economic Development, Jobs, Transport and Resources
GPO Box 4509
MELBOURNE VIC 3000

Dear Mr Arwas

## Advice on the Adequacy OF REGULATORY IMPACT STATEMENT

Thank you for seeking advice on the Regulatory Impact Statement (RIS) on the proposed new public holidays in Victoria.

The Victorian Competition and Efficiency Commission (VCEC) advises on the adequacy of a RIS as required under section 12H(3) of the *Subordinate Legislation Act 1994* (the Act). In doing so, the VCEC’s advice refers to the adequacy of the evidence and analysis presented in a RIS. Therefore in providing its advice the VCEC does not express a view on the merits of a proposal.

I advise that the final version of the RIS received by the VCEC on 29 June 2015 meets the requirements of section 12 of the Act.

In reaching this view, the VCEC notes that the Government’s policy to create the new public holidays in Victoria will affect the community significantly. These impacts are difficult to measure and ultimately depend on the value that individuals, families and the community place on additional leisure time, and the decisions of businesses to remain open or closed. As a result these impacts are difficult to value precisely and to aggregate across the Victorian community. Therefore careful and considered analysis is warranted.

In this context, the VCEC considers that the RIS presents credible estimates of the impact of the proposal where it is feasible to do so, and transparently sets out the methodology and supporting assumptions. Similarly, the RIS transparently and qualitatively discusses other potential impacts – such as coordinated leisure benefits for families – which are difficult to quantify reliably.

In the interests of transparency, it is government policy that 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