



Victorian
Competition & Efficiency
Commission

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10 April 2015

Mr Paul Salter
Chief Regulatory Economist
Transport Policy, Planning & Reform Division
Department of Economic Development, Jobs, Transport and Resources
Level 21, 1 Spring Street
MELBOURNE VIC 3000

Dear Mr Salter

ADVICE ON THE ADEQUACY OF REGULATORY IMPACT STATEMENT

Thank you for seeking advice on the Regulatory Impact Statement (RIS) on the proposed Transport (Compliance and Miscellaneous) (Conduct on Public Transport) Regulations 2015.

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 10 April 2015 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.**

In making this assessment, the VCEC notes that the proposed Regulations are largely intended to balance the potentially conflicting preferences of different public transport users. Given the nature of these issues, it is not practicable to quantify all costs and benefits, and the preferred approach is based on the available information and subjective judgements of the Department. The RIS transparently outlines the judgements made in developing the proposed Regulations and this, together with specific questions for stakeholders, will facilitate consultation and stakeholder feedback on the merits of these judgements.

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

Yours sincerely

Andrew Walker

Assistant Director

Victorian Competition and Efficiency Commission