



Victorian
Competition & Efficiency
Commission

Level 37, 2 Lonsdale Street
Melbourne Vic 3000

GPO Box 4379
Melbourne Vic 3001

T (03) 9092 5800
F (03) 9092 5845

E contact@vcec.vic.gov.au
www.vcec.vic.gov.au

27 August 2014

Ms Tess Hutton
Legislation Officer
Land Management Policy Division
Department of Environment & Primary Industries
Level 3, 8 Nicholson St
EAST MELBOURNE VIC 3002

Dear Ms Hutton

ADVICE ON THE ADEQUACY OF REGULATORY IMPACT STATEMENT

Thank you for seeking advice on the Regulatory Impact Statement (RIS) on the proposed Wildlife (State Game Reserves) Regulations 2014.

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 27 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 providing this advice, the VCEC considered the proportionality of the analysis relative to the expected impact of the proposal, which is to largely remake the existing regulations that sunset in November 2014.

The VCEC also notes that the analysis in the RIS is not based on an extensive evaluation of the effectiveness of the existing regulations. Similarly, there is some uncertainty as to the extent of the problems arising from open access to State Game Reserves that are intended to be addressed by the regulations, feasible regulatory and non-regulatory options and the net benefits of the proposed regulations. Stakeholder input is encouraged on these and other issues outlined in the RIS.

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