



10 September 2021

South Australian Productivity Commission  
Submitted via email to: [sapc@sa.gov.au](mailto:sapc@sa.gov.au)

### **Inquiry into the reform of South Australia's regulatory framework – response to Draft Report**

Thank you for the opportunity to provide a submission to the inquiry into the reform of South Australia's regulatory framework and the Draft Report. The following outline some key issues identified by the City of Charles Sturt Economic Development Team, further to the submission provided on the Issues Paper, dated 20 May 2021. Please note that these are staff views and have not be endorsed by Elected Members.

In general, there is support for the draft recommendations included in the draft report, further detail is provided on the following recommendations.

#### *Draft Recommendation 3.3 Continuous improvement of practice*

There is support for the public reporting of improvement strategies with a strong outcome focus and the establishment a community of best practice among SA regulators and policy agencies.

Consistency of the application and enforcement of regulations across Council boundaries to provide consistency for businesses and the use of best practice is important. This is particularly relevant for food production and sales based businesses that operate multiple facilities in number of Local Government areas.

Further consideration should be given to encouraging an incentive based approach for business regulation. A balanced approach is required for business related regulations. Where possible incentives for business to adopt best practice should be encouraged in preference to explicit government regulation. This allows the government to influence business behaviour and can be achieved through co-design with industry stakeholders and associations.

Further investigation should be undertaken to identify the current use and opportunities to create further incentive based regulation in South Australia.

#### *Draft Recommendation 4.3: Review priority policy*

In reference to the forth dot point (pg19), relating to stakeholder engagement, it is important that the review of existing legislation include engagement with the authorities tasked with

implementing and enforcing the legislation and that provision is made to include them in formulation of the improvement strategies and regulation reform. It is recommended that representatives from the Local Government Association or local government should have a seat at the review table for relevant legislation.

The myriad of approvals and permits required for start-ups is a potential barrier to small business growth and job creation. There is strong support for the NSW Government's Easy to do Business Program outlined on pg 168 of the draft report, DR16 to be established in South Australia. The Program streamlines the start-up process to allow café, restaurant and small bars to open up within 90 days by completing one online form or one phone call.

If you have any queries, or require further clarification, please do not hesitate to contact me via email: [kwundersitz@charlessturt.sa.gov.au](mailto:kwundersitz@charlessturt.sa.gov.au) or phone [REDACTED].

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Kym Wundersitz', with a stylized flourish at the end.

Kym Wundersitz  
Principal Economic and Strategic Planner