



1 July 2021

Ms Hayley Gossert
Inquiry Economist
South Australian Productivity Commission

Per email: Hayley.Gossert2@sa.gov.au

SADA supplementary submission – Red Tape Review being conducted by the SAPC.

Dear Hayley,

Thank you for your time on the telephone yesterday and for also the latitude extended regarding submissions to the South Australian Productivity Commission report into the regulatory framework operating in SA.

From a farmer's perspective the thrust of this submission is twofold:

1. Consideration should be given to the complexity of forms and,
2. That there is substantial room for improvement in the delivery of what are unnecessary face to face services.

Form complexity

This issue was only recently drawn to our attention, and it specifically arose out of a matter that caused our member irritation.

As you're doubtlessly aware there are no shortage of government demands, local, state and federal, which impose themselves on rural businesses, and dairy farm businesses are no exception. There is substantial bureaucratic intrusion on farm businesses from each level of government. Farm businesses interact with government and government departments regularly and each government department expects individual interaction with the farmer.

Consequently, the farmer's existence is hampered by a substantial list of forms that they are required to fill out on a regular basis for various government departments. A review of the list of forms from Service SA is indicative of the plethora of forms which government departments generate, and they are by no means exhaustive. [SA.GOV.AU - Forms for use at customer service centres \(www.sa.gov.au\)](http://www.sa.gov.au) offers a list of forms for Service SA centres. That site lists 86 government forms (including marine forms) of varying degrees of complexity.

SADA appreciates that no single business will ever have to fill all the forms requested but many of those forms are required by departments in the rural sector. This then enlivens the issue of



complexity. By way of example the form required of a farmer who wants to apply for a Conditional Registration and Compulsory Third Party Insurance (Form MR1A) for a vehicle to move about or between farms is a four-page document which requires cartography as part of the form. If a farm is running a number of quad bikes then the form will have to be filled out for each one.

We do not seek to suggest government forgoes its administrative responsibilities however, using the identified form as an example SADA believes that there is scope for both simplification, and more over reconsideration on how services are delivered not only to farmers but all South Australians.

The current methodology for the use of forms at Service SA centres is to have the forms available online at the website above and then to download those forms so that they may be filled out by hand. The form user is then committed to travelling to a Service SA Centre for the purpose of completing the transaction.

Online Services

Given the state of current technology, consideration should now be reasonably given to the concept of increased online services.

Perhaps to draw a comparison there are few institutions which generate more forms than the Commonwealth's Courts System. There are many forms in the family law jurisdiction alone. Nevertheless, these forms can be completed, lodged, filed, fees paid, stamped and occasionally served on other parties from any laptop. In Cook County court system, (Chicago), minor matters are dealt with on the basis of evidence being taken in virtual court rooms and judgments accordingly delivered. All courts in Australia now have at least some capacity to receive evidence and deal with procedural matters with lawyers and judges not only being in different places in a jurisdiction but around the whole country.

Having selected a form at random for the purpose of this letter the MR33 (Restricted Licence Application) is a case in point. The matters in that form could easily be attended to by way of an interaction between a staff member at Service SA and a person online. Licences are not issued directly by Service SA in any instance, the contractor who actually prints the licence is in Victoria (so licences are mailed out) and there is no reason that the transaction could not be conducted over a Zoom or Teams type technology, including payment. The requirement to produce a driver's licence can be done by scanning and frankly would be redundant as the licence as recorded on the system would be clearly referable by the Service SA staff member. (My licence is now a file on my SA Govt app on my phone including a barcode).

Conclusion

SADA maintains that technology has advanced to the point where farmers (and other South Australians) should be able to use the nearly ubiquitous technology in the community to deliver services more effectively.

SADA maintains the position that forms should be reviewed by departments in an effort to make them more friendly, that they should at least be completable on a computer and that greater efforts



be made to enable interaction between government and citizens to be more streamlined, particularly via electronic means.

Given the lateness of this submission SADA does not intend this submission to be read as a comprehensive policy document. What SADA is endeavouring to do is to highlight these matters to the SAPC in an effort for the SAPC to bring these matters to the attention of the SA Government through its reporting structures.

Again, SADA accepts that this submission may not fall on all fours with the terms of reference, however, procedures are the legitimate children of regulations and from a practical perspective SADA suggests that many of the resentments harboured by farmers and SA businesses arise not out of the regulations themselves but the procedures by which they are manifest.

Yours faithfully,

John Elferink
SADA Policy Officer.