

Small Business

Regulatory Impact Assessment Manual



A Victorian Government initiative



Foreword

The Victorian Government is committed to reducing the regulatory burden, creating a competitive business environment and achieving better social outcomes for Victorians.

All new legislative proposals that have significant impacts on business must be thoroughly assessed to ensure the benefits to the community outweigh the costs and the best option is being considered. In addition, a special assessment of the impact of the proposed legislation on small businesses is required, recognising that the compliance burden often falls disproportionately on that sector of the economy.

The *Victorian Guide to Regulation* provides a definitive guide to developing regulation in Victoria within the context of the Government's vision of well-targeted, effective and appropriate regulation. Chapter 5 of the *Guide* provides advice on how to assess small business impacts when preparing Business Impact Assessments or Regulatory Impact Statements.

The diverse nature of small business and the challenge of quantifying the costs and benefits of new legislative proposals suggest a need for policy officers within Government to have access to further support and advice in this area. The *Small Business Regulatory Impact Assessment Manual* is a supplement that is designed to complement the *Victorian Guide to Regulation* and provide more detailed assistance.

The manual draws on international best practice and provides guidance for policy officers developing regulation and legislative proposals. It sets out how to identify and assess the impact of regulation on small business, building on the material provided in the *Guide*. Practical advice on costing methodologies and consultation practices appropriate for small businesses are contained in the appendices.

Importantly, the manual will assist with consultation with business and encourage meaningful and cooperative discussion and liaison between Government and industry in assessing potential impacts on small businesses.

Through the adoption of the principles and processes described in this manual as well as the *Guide* itself, the community and business sector can have greater confidence that the decisions made by the Government in relation to regulation will contribute to improved living standards for Victorians.



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1. Introduction

The Victorian Government requires new legislative proposals to undergo Business Impact Assessment (BIA) processes. Proposals for new regulations (or statutory rules) must go through a Regulatory Impact Statement (RIS) process. It is compulsory for BIAs (and highly recommended for RISs) to consider effects on small business. This supplement to the *Victorian Guide to Regulation* (the *Guide*) offers practical assistance to policy officers on how to identify and assess the impact of regulation on small business, building on the guidance provided in Chapter 5 of the *Guide*.

There are many definitions of small business. The Australian Bureau of Statistics (ABS) defines small businesses as those with less than 20 full time employees. The majority of Victorian businesses are small businesses. In June 2004 there were an estimated 300,300 small businesses operating in Victoria, comprising 96 per cent of all businesses. Small businesses accounted for 43 per cent of private sector employment in Victoria.

The important issue when considering a regulatory change is whether the size of the business is such that there is a disproportionate impact on smaller businesses (whether defined narrowly or broadly by employees, turnover etc) compared to larger ones. Some medium sized businesses could also be included.

Good policy making requires that the impacts of regulation on small business are considered before implementation. Ideally, the process starts when ideas are first developed (eg. during a public inquiry process that is established by the Government to examine a particular problem), and continues through the consultation process, finalisation of the BIA or RIS and into the implementation and ongoing administration of the proposal. Proper consideration of the impacts of a proposal on small business can also contribute to high levels of compliance by businesses later on.

However, quantifying the impacts of regulation on businesses, including small businesses, can be difficult in practice. It can be difficult to separately identify impacts on small business *vis a vis* all businesses. There is also no generally agreed methodology, and there are often impacts that are particularly difficult to measure.

How to use this manual

This manual offers guidance to policy officers on how to identify and assess the impact of regulation on small business. It builds on the information provided in Chapter 5 of the *Guide*, in particular Step 4, and should be read in conjunction with that guidance. Section 2 of this manual establishes a process that should begin when a change to the regulatory environment is proposed. Practical guidance on costing methodologies and consultation practices appropriate for small businesses (including worked examples) is contained in the appendices.

For questions that go beyond the contents of this manual, contact the Victorian Competition and Efficiency Commission (VCEC) on (03) 9651 2211 or the Office of Small Business (OSB) within the Department of Innovation, Industry and Regional Development (DIIRD) on (03) 9651 9841.

2. Identifying the effects of regulation

The process set out below aims to help policy officers identify the effects that proposed regulations may have on small businesses. A worked example is included in a box for each Stage. Other examples are presented in Appendix D.

It is important to recognise that this process can take a substantial amount of time. Adequate time should be allowed during the regulatory process to ensure that this can occur. However, the level and extent of analysis should be proportionate to the overall impact of the proposal.

One important point to note is that Government can alleviate regulatory burdens for small businesses in some areas, but there are other issues that are intrinsic to all businesses, regardless of size. For example, workers employed by small business should not expect to face lower levels of safety nor should consumers purchasing food from small business expect a lower level of hygiene and food safety.

[Example]

Please note that this example (and those in Appendix D) is fictitious.

Following media reports of serious accidents involving lawnmowers operated by commercial landscapers, a Government agency has proposed a range of options for improving the safety of operators:

option 1 –	status quo;
option 2 –	each lawnmower operator employed by a commercial entity must be qualified and licensed;
option 3 –	each business must be licensed (i.e. only the business owner, who will be responsible for ensuring the safe operation of equipment by their employees);
option 4 –	seek to strengthen the Australian Standard for design of lawnmowers and utilise consumer protection legislation to ban unsafe models; or
option 5 –	greater education activity within the commercial landscaping industry, with support by WorkSafe.

After a preliminary assessment, the agency considers that a licensing scheme (option 2 or 3) is likely to best achieve the policy outcomes sought. The agency proposes to assess the relative cost implications for businesses of options 2 and 3 compared to the status quo.

The proposed licensing schemes would apply to the commercial use of all motorised lawnmowers (including ride-on and standard models). It is not proposed to regulate private use of lawnmowers, only the use of the equipment for commercial purposes. Businesses wishing to provide lawn mowing services will be required to obtain a licence from the Government (either a licence for each operator (option 2) or for each business entity employing operators (option 3)).

The main condition for obtaining a licence would be the completion of an approved safety course by the licence holder. Once issued, licences will be valid indefinitely unless the licence holder or one of its employees is involved in a serious safety incident, at which time the regulator can review the licence. The \$150 licence fee will fully recover the Government's costs of administering the scheme and delivering the training. Additional government funding is being proposed to pay for a public safety education campaign.

A. Identify types of businesses affected and the likely nature of impacts

Stage A

Stage B

Stage C

Stage D

Stage E

Stage F

The objective of this step is to identify whether firms of different sizes are likely to be affected by a regulatory proposal, and the likely nature of the impacts on firms.

You should begin by familiarising yourself with the guidance provided in Chapter 5 of the *Victorian Guide to Regulation*, in particular Step 4, which relates to identifying likely impacts, assessing costs and benefits, and assessing impacts on small business.

It is advisable to consult with the Victorian Office of Small Business at this point to obtain assistance with proposals that may have a disproportionate impact on small businesses, or if you are uncertain how to determine whether a proposal is likely to have a disproportionate impact on small business.

Types of businesses affected

It is important to carefully consider the types of businesses that might be affected by the proposal. Affected businesses might not be immediately apparent. The following questions should be considered:

- **How is the industry structured?** For example, identify the constituent parts and related entities of the industry.
- **Are businesses up or down the supply chain and other related businesses affected?** For example, a regulatory requirement to stop using a certain type of building material in housing construction might not just affect building companies but also their subcontractors, as well as the building products supplier, the companies that supply inputs and services to that company, companies that transport building products, and so on.

- **Could there be unintended impacts on businesses which are not targeted by the proposal?** For example, the ban on poker machines in Victoria led to the development of large scale gambling industry in several towns along the NSW-Victoria border.
- **Are businesses with particular characteristics impacted to a different degree?** For example, part-time practitioners, businesses in rural areas, businesses with a workforce with particular characteristics such as age, language or gender, or businesses utilising a particular technology.
- **Are different categories of small business affected to different degrees?** For example, micro-businesses, home-based businesses, sole traders etc.

Likely nature of impacts

In identifying the likely nature of impacts on firms, consider the following questions:

- **What types of administrative and compliance costs are incurred by firms?** For example, additional reporting requirements, costs associated with understanding regulatory requirements, fees and charges levied by government, costs of changing production, transport or marketing processes, changes in input costs, impacts on competition etc.
- **What types of firms do each of the identified impacts affect?** For example, small or large businesses, importers or exporters, businesses in rural areas etc.

[Example]

Stage A

Stage B

Stage C

Stage D

Stage E

Stage F

Consultations and research indicate that commercial lawn mowing activities cover a range of different business types:

- Large franchise systems involving a large number of relatively small franchisees
- A relatively large number of small companies (fewer than five employees) not associated with a major franchise system
- Independent contractors/sole operators who provide domestic lawn mowing services for a fee
- Businesses for which lawn mowing is not the core element of their operations, but is still critical to their success (e.g. golf clubs, restaurants and cafes with lawn areas where customers can eat, botanical gardens, schools)

Regulatory costs for businesses will comprise the time taken to undertake the training course, and the time and expense of obtaining the licence:

- Half-day course at TAFE colleges around the State – five hours, including one hour of travel time (note: the Government is proposing that the cost of undertaking the course itself will be included in the licence fee, but it will not reimburse participants for their time)
- Time taken to complete the licence application form – five minutes
- Time taken to gather the documentation required, such as proof of identity (current driver's licence or passport), proof of qualification, and proof of business (ABN and certificate of registration of business name) – 20 minutes
- Time taken to submit application in person at CAV office – one hour.
- TOTAL time required: 385 minutes
- Plus one-off licensing fee: \$150

B. Obtain preliminary feedback from a sample of all (small and large) businesses likely to be affected

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

Once you have identified the types of firms affected and the likely nature of any impacts, the next step is to obtain preliminary feedback from a sample of all affected firms (large and small) to gather information to assess the impacts on firms of different sizes. Input on possible alternatives to the regulatory proposal should also be sought in this step. The information gathered in this step will then feed into Stage C. However, it is important to note that this sort of consultation can be expensive, and that the intention of this stage is to get high level rather than comprehensive input.

Government regulations can impose high costs on all businesses, but this is particularly so for small businesses for two main reasons. First, many small businesses do not have the economies of scale or larger revenue base over which to spread the costs of regulatory compliance. Second, they generally do not have in-house regulatory expertise to assist with compliance – they have few employees and, in many cases, owners run the business.

A proposal might have a disproportionate impact on small businesses either directly (for example, a flat fee will have a relatively greater impact on small businesses than on a large business) or indirectly (for example, small businesses may find it difficult to adapt processes or purchase new equipment within the required timeframe).

Selecting firms to consult

In selecting a sample of firms to consult, it is important to ensure that the sample is representative of the firms likely to be affected by the proposal – for example, businesses of different sizes, from different sectors and locations, upstream and downstream, importers and exporters, related businesses, businesses that may be unintentionally affected, etc. Further guidance on selecting firms to consult is provided in Appendix B.

One of the most common mistakes made at this stage of the process is to consult with an industry association alone without considering if the association is truly representative of the entire industry. If consultation is to be focussed through an industry association, you should ensure that the industry association is really representative of the entire industry.

Consultation format and questions

This initial consultation can be face-to-face or by telephone. While an initial letter or email of introduction may be useful, you are likely to need to follow up with a face-to-face or telephone interview to ensure a response is received. You should allow time for the respondent to consider the details of the proposal before they respond.

Interview questions should be aimed at eliciting information on the nature and magnitude of the impacts on firms of different sizes, along with alternative approaches to achieve the regulatory objectives. Examples include:

- What is your view of the overall concept of the Government's proposals for ...?
- Do you see any alternative courses of action that would still achieve the Government's objectives?
- How does the proposed approach differ from what you already do?
- What do you perceive to be the costs and benefits?
- If the proposal were to come into force, what would your business have to do before and after implementation to comply with the proposed measure?
- Will it change how your business operates generally, and how it relates to other businesses and consumers?
- Do you think there will be different impacts on small and large businesses, and how will those impacts differ?
- What is the current situation regarding legislation in this policy field in the most relevant competitor countries?
- How will the proposed legislation affect market mechanisms such as competition and pricing?

There are also some specific questions that may be useful to ask of industry associations:

- What are the likely socio-economic effects of the proposal (in terms of employment opportunities, wage costs and similar)?
- How many businesses will actually be affected by the proposed legislation?

Further guidance on consultation is provided in Appendix B.

C

Determine if there is a material variation in the impact between small and large firms

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

Based on the feedback obtained in the previous step, you should then determine if the proposal is likely to have a materially different impact on small businesses compared to large businesses. You should look at the relative importance of the various costs associated with the proposal. These costs may be fixed (that is, they do not change when output changes, such as administrative costs) or variable (that is, they do change when output changes, such as labour), one-off or ongoing.

If there is not a material variation, you should document the analysis undertaken, including the findings of your assessment of whether the proposal has a disproportionate impact on small business and why you reached this finding, for inclusion in the RIS/BIA¹. In this case, no further analysis on the specific impacts on small businesses is required; any further consultation can be incorporated in the broader BIA/RIS.

If there is likely to be a materially different impact on small businesses, you should proceed to Stages D and E.

[Example]

Figures from WorkSafe indicate that, despite the recent media reports, the incidence of lawnmower-related injuries among commercial businesses is quite low. This finding would be used to assess the expected benefit of introducing a regulatory scheme, to compare against the expected costs (impact on business).

Preliminary feedback from a sample of businesses suggests that the impact on business varies depending on the option adopted.

If businesses are required to obtain licences for each of their employees that operate lawn mowing equipment (option 2), larger businesses with multiple employees will bear significantly more costs than small businesses and independent contractors/sole operators, but the burden increases proportionately with the size of the business.

Licensing the employer rather than each individual lawnmower operator or employee (option 3) imposes the same regulatory burden on all businesses, regardless of size.

The second model (option 3) places a disproportionately higher burden on small firms, because the cost of the licensing scheme does not increase proportionately with business size.

A disproportionate burden on smaller businesses does not necessarily mean that the proposal should be rejected, and it should not be taken that a less efficient option overall should be preferred in order to avoid disproportionate burdens on smaller businesses. However, it does indicate that other options, for example a licensing regime that focuses on operators that have had safety issues in the past, or non-regulatory approaches, should be given closer consideration.

1. You should also document the consultation undertaken (and how small businesses and representative bodies can submit their views during the public consultation phase of the RIS process) in the relevant sections of the RIS/BIA.

D. Conduct detailed assessment of impacts on small firms

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

The objective of this step is to quantify and highlight the impact of the proposal on small firms specifically.

This involves:

- quantifying the costs and benefits for small firms, including more extensive consultation with a sample of representative firms, and data analysis on the number of affected firms;
- describing significant regulatory changes that have affected these firms over the last two years; and
- listing any possible unintentional or offsetting effects that exist – for example, higher taxes could result in small firms facing greater competition from illegal traders, or a greater risk of non-compliance due to increased regulatory complexity or regulatory overload.

Ideally, analysis should be quantitative because this provides the most objective basis for making a decision. Qualitative information, such as quotes and anecdotes, can be used when quantitative information is not available.

Issues to consider

The assessment of the impact on small business should include consideration of the following issues:

- the variation in the regulatory burden between a typical small business and a typical large business;
- whether compliance flexibility options could assist small businesses to meet the requirements of the proposal (see Stage E);
- the distribution of benefits of the proposal between small and large businesses;
- the extent of compliance by small versus big business²; and

- the relative impact on small businesses of penalties for non-compliance – for example, by expressing costs as a percentage of turnover.

You do not need to consult with a large number of businesses to obtain this information. A small sample that is representative of the industry should be sufficient.

Consultation approaches

The detailed consultations in this step should generally take place during the BIA process or before the public consultation phase of the RIS process. In exceptional circumstances where this is not possible, such consultations can take place concurrently with public consultations.

There are a range of consultative approaches that can be used to elicit information on the impacts of a proposal on small business, including one-on-one interviews, telephone interviews, focus groups, postal or online questionnaires and written submissions. The most appropriate approach will depend on the issues under consideration, the nature of the group being consulted, and the resources (including time) available for undertaking the consultation. The information obtained in Stage B should provide a good basis for articulating the questions you would like businesses to consider. More detailed guidance on consultation is provided in Appendix B.

Estimating impacts

An important step in estimating the impacts of a proposal involves estimating the number of affected firms by firm type or regulatory event. This is then multiplied by the estimated impact per firm to estimate the aggregate impacts of the proposal for small business. Appendix B contains guidance on how to estimate the population of affected firms.

² Over-regulation can be counterproductive, particularly with respect to small businesses. If small businesses are unable to cope with the regulatory burden they may either withdraw from the industry or stay in the industry but fail to properly comply with the regulation.

[Example]

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

The cost of the lawn mowing licensing scheme over and above the status quo is two-fold:

- the costs for existing operators/businesses in the industry to be trained and licensed; and
- the on-going costs over subsequent years as new people enter the industry and are required to be licensed.

Calculate the costs of licensing existing commercial operators/businesses:

The total regulatory costs will depend on the number of operators or businesses that must obtain a licence.

Detailed consultation and scoping of the size of the industry indicates that the number of commercial lawn mowing *equipment operators* is:

- 5000 employed by large businesses/franchise networks;
- 1000 employed by for small businesses/sole operators; and
- 500 employees of other business types who operate lawn mowing equipment as part of their work.

Research also indicates that the number of *businesses* employing commercial lawn mower equipment operators is:

- 20 large lawn mowing businesses and franchise networks;
- 800 small businesses/sole operators; and
- 300 other businesses that employ lawn mowing operators.

For simplicity, we have assumed a one-off licensing process without annual renewals.³

Option 2 – each operator of lawn mowing equipment must be licensed

Total regulatory cost = process costs x number of operators

For all operators, process costs will be the same⁴ = total time associated with travelling to and completing the safety course, completing forms, gathering documentation and lodging application x average hourly rate for lawn mowing services (i.e. foregone income, estimated to be \$27/hour, or \$0.45/min, based on a series of quotes obtained from across the State).

Regulatory costs (time)⁵ for large businesses = (385 min x \$0.45/min) x 5000 = \$866,250

Regulatory costs (fees)⁶ for large businesses = \$150 x 5000 = \$750,000

Total costs for large businesses = \$1,616,250 = \$80,812 per business (average)

Regulatory costs (time) for small businesses = (385 min x \$0.45/min) x 1000 = \$173,250

Regulatory costs (fees) for small businesses = \$150 x 1000 = \$150,000

Total costs for small businesses = \$323,250 = \$404 per business (average)

Regulatory costs (time) for other operators = (385 min x \$0.45/min) x 500 = \$86,625

Regulatory costs (fees) for other operators = \$150 x 500 = \$75,000

Total costs for other operators = \$161,625 = \$538 per business (average)

Total regulatory costs for all businesses = \$2,101,125

Stage A
Stage B
Stage C
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Stage E
Stage F

Option 3 – each business must be licensed

Total regulatory cost = process costs x number of business entities (employers)

Process costs = total time associated with completing the safety course, completing forms, gathering documentation and lodging application x average lawn mowing rate

Regulatory costs (time) for large businesses = (385 min x \$0.45/min) x 20 = \$3465

Regulatory costs (fees) for large businesses = \$150 x 20 = \$3000

Total costs for large businesses = \$6465 = \$323 per business (average)

Regulatory costs (time) for small businesses = (385 min x \$0.45/min) x 800 = \$138,600

Regulatory costs (fees) for small businesses = \$150 x 800 = \$120,000

Total costs for small businesses = \$258,600 = \$323 per business (average)

Regulatory costs (time) for other operators = (385 min x \$0.45/min) x 300 = \$51,975

Regulatory costs (fees) for other operators = \$150 x 300 = \$45,000

Total costs for other operators = \$96,975 = \$323 per business (average)

Total regulatory costs for all businesses = \$362,040

Estimate the future costs for new entrants to the industry

RIS/BIA's require a Net Present Value (NPV) calculation of 10 years' worth of costs for proposed regulatory schemes. This requires a simple spreadsheet calculation, estimating the expected number of new licences that will be issued, and the costs for new entrants discounted to present values.⁷

Option 2 – each operator of lawn mowing equipment must be licensed

Research indicates that churn of lawn mower operators is relatively high – about 10% of operators leave the industry each year – and with moderate growth expected to continue, about 12% of operators each year are new to the industry. These new entrants will, under the proposed scheme, face the cost of training and licensing.

Assuming operators enter and exit the industry in steady fashion and evenly across the different types/sizes of business, a calculation of the NPV of future licensing costs would be as follows (a real discount rate of 3.5% has been assumed):

3. If there were to be regular renewals or reviews the cost equation would become:
Total regulatory cost = process costs x number of licences x frequency of renewal (discounted for future values)
4. For simplicity we have assumed that each operator/employee applies for their licence separately. Depending on how the regime is implemented, businesses with multiple employees might be able to submit a single application for all their employees, reducing slightly the time involved in completing and submitting forms.
5. Estimated time to complete training course and apply for licence is 385 minutes
6. Proposed licence fee is \$150
7. Contact the VCEC or refer to Section C.3 in Appendix C of the Victorian Guide to Regulation for advice on how to perform a Net Present Value calculation.

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

Option 2 (continued)

		Present	Year 2	Year 3	...	Year 10
Large businesses						
no. of operators	current operators – exits + new entrants	5000	5100	5202	...	5975
no. of operators leaving industry	no. of operators x 10%	500	510	520	...	598
no. of new operators	no. of operators x 12%	600	612	624	...	717
Small business						
no. of operators	current operators – exits + new entrants	1000	1020	1040	...	1195
no. of operators leaving industry	no. of operators x 10%	100	102	104	...	120
no. of new operators	no. of operators x 12%	120	122	125	...	143
Other Business types						
no. of operators	current operators – exits + new entrants	500	510	520	...	598
no. of operators leaving industry	no. of operators x 10%	50	51	52	...	60
no. of new operators	no. of operators x 12%	60	61	62	...	72
Costs (time) per application	time x \$27/hour	\$173.25	\$173.25	\$173.25	...	\$173.25
Costs (fees) per application	\$150 fee	\$150.00	\$150.00	\$150.00	...	\$150.00
Total costs (future value)	(Time + fees) x number of new operators					
Large businesses		\$193,950	\$197,829	\$201,786	...	\$231,788
Small businesses		\$38,790	\$39,566	\$40,357	...	\$46,358
Other business types		\$19,395	\$19,783	\$20,179	...	\$23,179
Total		\$252,136	\$257,178	\$262,321	...	\$301,325
Total costs (present value)	Future value / (1+discount rate) ^{year}					
Large businesses		\$193,950	\$191,139	\$188,369	...	\$170,070
Small businesses		\$38,790	\$38,228	\$37,674	...	\$34,014
Other business types		\$19,395	\$19,114	\$18,837	...	\$17,007
Total		\$252,135	\$248,481	\$244,880	...	\$221,091

The Net Present Value of licensing costs for new entrants under this scheme (sum of discounted future licensing costs over 10 years) is:

Large businesses	\$ 1,817,777
Small businesses	\$ 363,555
Other business types	\$ 181,778
Total	\$ 2,363,111

Stage A

Stage B

Stage C

Stage D

Stage E

Stage F

Option 3 – each business must be licensed

Churn of *business entities* in the industry is slightly different, as it varies by the type of business. Industry sources suggest that, on average, one large business or franchise group leaves the industry each year, and one enters (this includes sales of businesses to new owners, requiring re-training and re-licensing). Churn of small businesses and sole traders is higher, with about 15% leaving the industry each year and 17% being new entrants. For other operators, the same rate of churn as in the previous calculation is applied.

This makes the calculation as follows:

		Present	Year 2	Year 3	...	Year 10
Large businesses						
no. of companies	current companies – exits + new entrants	20	20	20	...	20
no. of companies leaving industry	one exit and one entry on average per year	1	1	1	...	1
no. of new companies		1	1	1	...	1
Small business						
no. of small businesses	current companies – exits + new entrants	800	816	832	...	956
no. of small businesses leaving industry	no. of small businesses x 15%	120	122	125	...	143
no. of new small businesses	no. of small businesses x 17%	136	139	141	...	163
Other Business types						
no. of other businesses	current companies – exists + new entrants	300	306	312	...	359
no. of other businesses leaving industry	no. of small businesses x 10%	30	31	31	...	36
no. of new other businesses	no. of small businesses x 12%	36	37	37	...	43
Costs (time) per application	time x \$27/hour	\$173.25	\$173.25	\$173.25	...	\$173.25
Costs (fees) per application	\$150 fee	\$150.00	\$150.00	\$150.00	...	\$150.00
Total costs (future value)	(Time + fees) x number of new operators					
Large businesses		\$323	\$323	\$323	...	\$323
Small businesses		\$43,962	\$44,841	\$45,738	...	\$52,539
Other business types		\$11,637	\$11,870	\$12,107	...	\$13,907
Total		\$55,922	\$57,034	\$58,168	...	\$66,769
Total costs (present value)	Future value / (1+discount rate) ⁿ year					
Large businesses		\$323	\$312	\$302	...	\$237
Small businesses		\$43,962	\$43,325	\$42,697	...	\$38,549
Other business types		\$11,637	\$11,468	\$11,302	...	\$10,204
Total		\$55,922	\$55,106	\$54,301	...	\$48,991

The Net Present Value of licensing costs for new entrants under this scheme (sum of discounted future licensing costs over 10 years) is:

Large businesses	\$ 2,782
Small businesses	\$ 412,030
Other business types	\$ 109,067
Total	\$ 523,879

Stage A
Stage B
Stage C
Stage D
Stage E
Stage F

Add costs for existing industry participants and discounted future costs for new entrants to obtain total regulatory costs of each Option

Option 2 – each operator of lawn mowing equipment must be licensed

Cost for current operators = \$2,101,125

PV of cost for future entrants = \$2,363,111

Total cost to business of proposed scheme over 10 years = \$4,464,236

Option 3 – each business must be licensed

Cost for current operators = \$362,040

PV of cost for future entrants = \$523,879

Total cost to business of proposed scheme over 10 years = \$885,919

This type of cost analysis can now be used to:

- compare different regulatory proposals against each other; and
- assess the costs of proposals against the expected benefits, to determine the net public benefit.

E. Assess alternative options

Stage A

Stage B

Stage C

Stage D

Stage E

Stage F

The objective of this step is to assess the suitability of alternative, more flexible ways in which small businesses can more readily meet the regulatory objectives, given their particular characteristics.

The first alternative must generally be no regulatory action, particularly if the small business impact analysis and consultation suggests that there are major concerns or impacts likely to arise from the proposed change. In such an event the proposal may need to be reconsidered.

Other alternative approaches that could be considered include:

- longer implementation times for small businesses to allow them to become familiar with regulatory requirements, obtain external advice on compliance issues, adjust administrative, production, transport or marketing procedures etc;
- access to targeted assistance for small business to help them comply with regulatory requirements – this might take the form of a help line, financial assistance, technical advice etc;
- measures aimed at reducing the regulatory burden such as development and provision of model or template policies or forms, providing for electronic lodgement of paperwork etc;

- partial or complete regulatory exemption; and
- tiered penalties for non-compliance based on firm size – for example, varying the size of a fine with the size of the businesses.

You should assess the costs and benefits associated with any alternative options identified to assess their suitability. This involves collecting information during consultations on the likely benefits to representative firms of alternative regulatory approaches (such as reduced administrative costs, reduced costs of changing production processes, reduced costs of external advice, delaying expenditure on new equipment or other technology, reduced penalties for non-compliance etc, relative to the original proposal). It also involves estimating any additional costs or benefits to government of alternative approaches (such as costs of providing targeted assistance, reduced revenue from penalties, reduced costs associated with non-compliance, delayed achievement of regulatory objectives due to extended implementation times etc).

[Example]

Apart from the options identified by the Government agency (described on page 4), consultations highlighted that an alternative option which allowed businesses to lodge applications electronically and undertake an on-line training module would reduce the regulatory burden and cost for all businesses, without compromising regulatory outcomes.

It was estimated that electronic submission would take about 15 minutes, compared to 60 minutes to apply in person. The use of on-line training rather than face-to-face would still take approximately four hours on average, but one hour of travel time to and from the course would be saved, and the licence fee could be reduced to \$75 as the cost to Government of subsidising the training would be less. The same calculation as performed above can be repeated using this reduced time and fee data, to determine the relative benefit of developing an on-line solution.

F. Draft BIA or RIS

Stage A

Stage B

Stage C

Stage D

Stage E

Stage F

At a minimum, the information and feedback obtained from Stages D and E should be incorporated into the draft BIA or RIS, which is then distributed as part of the public consultation process. The BIA or RIS should provide full details of:

- industry structure – the parties likely to be affected, broken down by sector, location and/or other relevant characteristics;
- consultation to date – the number, size, sector and locations of the businesses consulted (or membership details for representative bodies), along with the consultation approach (face-to-face, forum, etc);
- options for addressing the problem – include those identified during consultation;
- costs and benefits of each option – a detailed quantitative (if possible) or qualitative analysis of small business impacts (both in aggregate and on individual businesses), including an assessment of the risks associated with any estimates; and
- implementation issues – including the longer term implications of the impacts for small business (Are they one-off or ongoing costs? Will they reduce over time?) and any steps taken to reduce negative and unintended impacts for small businesses.

In addition, you should provide feedback to participants on:

- how the policy was influenced or if no changes were made, why not; and
- how they can have further input into the regulatory process.

Some useful tools

[Appendix A]

A number of tools exist for assessing the impact of regulatory proposals. While these tools have not been developed specifically for small business, they can be useful in analysing the impacts of proposals on small business. However, while these tools are useful screening tools, they are of limited use for detailed analysis. On their own, they generally do not provide sufficient analysis on which to base policy decisions.

This appendix briefly describes the Victorian Standard Cost Model (SCM), developed by the Victorian Department of Treasury and Finance, and the Business Cost Calculator (BCC), developed by the Australian Government's Department of Industry, Tourism and Resources (DITR).

Standard Cost Model

The Standard Cost Model (SCM) was developed by the Dutch Government to provide a consistent method for estimating the administrative costs imposed on business by government. It has been adopted by more than 20 countries to date and is currently being used by the OECD to compare regulatory regimes in different countries.

The SCM method involves breaking down individual regulations into a range of manageable components or activities that can be measured using an activity-based methodology. It involves identifying the regulations that impose an administrative burden on businesses, charities and voluntary organisations followed by systematic measurement of the cost of that regulation across government through extensive interviews with individual businesses, charities and voluntary sector organisations.

The SCM uses a high degree of detail in the measurement of the administrative costs, in particular going down to the level of individual activities.

The Victorian Government, as part of the *Reducing the Regulatory Burden* initiative, has committed to measuring the change in the administrative burden of regulation using the SCM methodology. The Better Regulation Unit, within the Department of Treasury and Finance, has developed a Victorian version of the international SCM manual.

The Victorian SCM has been developed to measure the administrative burden of regulation on all businesses, however it can be utilised to specifically measure the impact of this burden on small business.

Contact betterregulationunit@dtf.vic.gov.au for more information and advice on the SCM.

DITR Business Cost Calculator

The Commonwealth Office of Small Business within DITR has developed a costing model to assist policy makers measure and analyse the regulatory costs of policy options in an objective and standardised manner. The model has been developed to be used by a broad range of policy making organisations at any level of Government, generating information that can be used in policy processes such as BIAs, RISs, Cabinet Submissions and Statements of Small Business Impacts (for Cabinet proposals at the Commonwealth level which have a high or medium impact on small business).

The costing model contains six steps to assist policy officers formulate policy options and, for each option, estimate the regulatory cost on business. The regulatory costs are based on an activity-based costing methodology designed to give consistent outputs for analysis and comparison. The model captures and measures only those costs directly related to the regulation or policy. It is not designed to measure the indirect impacts, for example, psychological and opportunity costs, and other impacts on competitiveness and net cash-flow.

The costing model is designed to cost first-round effects only and to give a verifiable indication of the size of the regulatory burden. It is not intended to provide an accurate cost of the total impact of a regulation or policy.

The costing model requires identification of the tasks that businesses need to perform in order to comply with a regulation. These costs can be divided into nine different cost categories:

- notification;
- education;
- permission;
- purchase cost;
- record keeping;
- enforcement;
- publication and documentation;
- procedural; and
- other.

The costing model:

- provides a standard approach to estimate the cost of the regulatory burden, eliminating the need to develop your own methodology;
- assists in sequentially thinking through the likely impact of proposals; and
- allows various reports to be generated from which costs can be analysed.

Further information on the BCC is available on the DITR website **www.industry.gov.au**. Guidance material available on this site includes a Quick-Start Guide, User Guide (including a worked example) and Cost Category Guide, along with information on using the BCC for BIAs or RISs.

The Commonwealth Office of Small Business can provide assistance in using the BCC for BIA or RIS purposes. You can send a request for assistance by emailing **businesscostcalculator@industry.gov.au**.

There are limits to the usefulness of the Costing Model. It is not a substitute for full analysis and should be used as a tool only. Analysis based on the Costing Model alone will not generally be considered sufficient for a BIA or RIS.

Consultation

[Appendix B]

Businesses have detailed knowledge of the costs of regulation, and appropriate consultation can greatly assist policy officers in assessing and quantifying the effects of a new legislative proposal. The guidance in this Appendix aims to provide practical tips for policy officers undertaking consultations to assess small business impacts.

Before you start

Before consultation starts, you should develop a detailed consultation plan that outlines the objectives of the consultation, the processes to be employed and indicative timeframes. The plan should provide for broad consultation during all phases of the regulation development process, allowing a minimum of 28 days (and ideally 60 days) for written consultation at least once during the development of the policy.

Those running consultations should also familiarise themselves with the industry at this stage. You should be aware of such things as:

- the size and general characteristics of the industry (for example, lots of small players or a few big players);
- general economic conditions in the industry (for example, is the industry growing or contracting);
- basic work arrangements in the industry (for example, large proportions of subcontractors, shift work, etc);
- the regulatory framework and, if it is a heavily regulated industry, some of the changes in regulated parameters – for example, in the taxi industry, how much have taxi licence values changed in recent years; and
- current levels of regulatory compliance in the industry.

Identifying businesses to consult

It can be difficult to identify which businesses will be affected by regulatory change and which should be included in the consultation process. Many small businesses are not members of industry associations, which are often used as a starting point for consultation. Alternatives include:

- small business representatives, such as the Small Enterprise Association of Australia and New Zealand, Council of Small Business Organisations of Australia (COSBOA), VECCL and ACCI, as well as industry associations representing businesses of all sizes from particular industries;
- Australian Bureau of Statistics which holds a register of businesses; and
- Yellow Pages and other business directories.

The office of Small Business within DIIRD **(03) 9651 9841** can also provide advice and assistance in identifying businesses to consult.

Ensure participants are selected who can provide relevant feedback or information. Characteristics such as location, firm size, sectors, etc are important. The participants should be representative of those businesses potentially affected.

When consulting on Stages B and D, it is important to seek a commitment of confidentiality (in writing) from those invited to participate before the agenda with the list of specific questions is distributed.

Getting engagement

Getting engagement with the industry is important for gathering quality consultation results. A detailed consultation plan should be drafted that includes ways of ensuring buy-in from the industry. This may include approaching a representative industry association first and asking their assistance in identifying people to be involved.

Realistic expectations

Arranging and undertaking consultation processes generally takes a lot of time; consultation processes with small businesses generally takes even longer than those with large businesses. You may need to conduct consultations outside normal business hours or at their workplace.

Personal is best

Small businesses generally rely heavily upon personal relationships. It is recommended that anyone conducting a consultation process with small business owners makes the effort to make personal contact and engage with those they want to speak with.

Choosing the consultation format

The most appropriate consultation format depends in part on the stage of the policy development process. Face-to-face interviews and focus groups may be more useful during Stage B (obtaining preliminary feedback) and Stage D (detailed assessment of impacts), with written submissions following Stage F (distribution of a draft RIS). The advantages and disadvantages of various consultation formats are outlined below.

It is important to note that detailed information on costs and business effects is rarely obtained through any method other than one-on-one face-to-face interviews.

One-on-one interviews

- Better for obtaining detailed costing information.
- More time consuming and costly.
- Evidence to suggest businesses are willing to give up their time because they feel that they are getting something out of the interview.
- Useful for establishing a rapport with businesses.
- Interviews should last between one and a half and two hours.

Focus groups

- Individuals with a common interest, brought together to discuss a specific issue.
- Better for gathering qualitative rather than quantitative information because businesses are generally unwilling to divulge detailed cost information in front of their competitors.
- Provide an opportunity for respondents to interact and therefore generate thoughts and responses that may not come from one-on-one interviews.
- Meetings should last between one and a half and two hours.

Telephone interviews

- Useful for getting background information at the beginning of the process.
- Response rates are likely to be higher than a postal questionnaire. However, multiple calls are required in most cases. The booking of a specific time for completing the questionnaire is effective in very few cases.

- Who happens to answer and who happens to be available when the call is made leads to concerns about the appropriateness of the person interviewed and the reliability of responses.

Online or postal questionnaire

- Allows for more complex issues or a wider range of issues to be examined than a telephone questionnaire.
- Limited usefulness because of generally low response rates due to:
 - a questionnaire itself may be seen as yet another regulatory intrusion which adds to the burden of regulation;
 - there may be general suspicion of anything to do with government. For example, there may be concern that responses to questions about regulatory compliance might be used to tighten enforcement in general or for specific businesses or groups of businesses;
 - there may be a lack of belief that returning a questionnaire can have any influence at all on regulatory decisions; or
 - non-response may follow from a general strategy of only doing the minimum that is legally necessary.
- Responses from small businesses are likely to be limited because:
 - the cost of participating in this type of study, relative to value added, profits, etc is higher than for larger companies; and
 - compliance levels can be expected to be lower, providing businesses with added incentives to 'stay out of the way' of any activity that may be associated with a government's interest in regulation.
- The longer and more complex the questionnaire, the lower the likely response rate. It also raises the potential for respondents to interpret questions differently.

Written submissions

- Useful for obtaining detailed comments on complex issues.
- A time consuming process for respondents and policy officers. Best conducted at the end of the policy development process with adequate time allowed for responses.
- Responses from small businesses are likely to be limited for reasons similar to those outlined for online/postal questionnaires.

Information sources

[Appendix C]

Obtaining detailed quantification of the nature and extent of a problem that will be addressed by regulatory intervention and the costs and benefits of that regulatory intervention is usually the most difficult part of preparing a RIS or BIA. Guidance on assessing the costs and benefits of proposals is provided in the *Victorian Guide to Regulation*. The discussion here aims to provide further guidance with particular reference to small business.

A useful first step in quantifying the impacts of a proposal on small business is to draw up a table of impacts, detailing:

- the nature of the impacts on small business, including any unintended impacts;
- whether each identified impact is of a compliance, administrative or direct nature;
- whether the impact is ongoing or one-off; and
- the parties incurring the impact (for example, whether it applies to all small businesses, only those in a given sector, or only those that have certain characteristics such as a technology used or their location).

This can assist in systematically identifying the impacts involved and help think about what information will be needed to quantify those impacts.

To estimate the magnitude of the impacts for small business arising from a given impact of a proposal, it is necessary to estimate the incremental change for a typical business. This estimate is then multiplied by the number of businesses affected to obtain the aggregate impact for a given impact. These impacts can then be summed to provide an estimate of total impacts incurred by small business in complying with the new or amended regulation.

VCEC (www.vcec.vic.gov.au or **(03) 9651 2211**) and the Victorian Office of Small Business within DIIRD (**(03) 9651 9841**) can provide advice on analysing the impacts of proposals that may have a disproportionate impact on small businesses, or if you are uncertain how to determine whether a proposal is likely to have a disproportionate impact on small business.

Information sources

Much of the information required to assess regulatory changes will be obtained from sources such as:

- literature surveys (including research documents, market reports, internet search);
- information obtained through consultation processes;
- industry surveys – existing or commissioned;
- past RISs and BIAs relevant to the proposal; and
- experience in other jurisdictions – interstate and overseas.

Additional information is available from the following sources.

General information

- Business Victoria (www.business.vic.gov.au) – provides a wide range of information including industry plans and audits, research and statistics, IBISWorld industry sector overviews and links to external sources of information;
- Office of Small Business (Commonwealth) (www.industry.gov.au) – information on small business statistics (such as the Annual Review of Small Business) and the Business Cost Calculator.
- National Small Business Forum – the formal consultative mechanism between government and peak industry and professional associations representing small business.
- Representative bodies for small business – for example, COSBOA, VECCI and ACCI, as well as industry associations representing businesses of all sizes from particular industries.
- Victorian Workcover Authority (www.workcover.vic.gov.au) – provides information on the number of firms by industry.

Costs

- Australian Bureau of Statistics (www.abs.gov.au) – statistics on economic indicators and industries, including information on the Labour Price Index (in relation to the hourly rates of pay), counts of businesses sourced from the ABS Business Register and inflation rates. (While RIS/BIA analysis is expressed in real terms, inflation rates may be useful where past estimates need to be converted to current terms.)
- State Revenue Office (Victoria) (www.sro.vic.gov.au) – provides information on payroll tax and other state government taxes and duties.
- WageNet (www.wagenet.gov.au) – information about wages and conditions of employment in Australia for work that is covered by federal awards and agreements.
- Australian Taxation Office (www.ato.gov.au) – statistical information is available on their website.
- State Library of Victoria's Express Information service – a comprehensive fee-based research service with strengths in business and statistical information.
- FMRC Business Development Benchmarking Team Pty Ltd provides financial statistic “benchmarks” on dozens of small business sectors. The benchmarks analyse financial information. Over 90 Small Business Profiles are available for purchase.
- Sensis Business Index (formerly Yellow Pages Business Index) provides quarterly economic survey of small business issues, confidence and behaviour.
- The Sensis E-Business Report looks at Internet and e-Commerce uptake, attitudes, challenges and successes as experienced by Australian Small and Medium Enterprises.
- Monash University Accident Research Centre (www.monash.edu.au/muarc/) – researches and reports on injury prevention and control in all modes of transport, in the workplace, community and home. The Victorian Injury Surveillance Unit (VISU) maintains, analyses, reports on, disseminates and applies injury data to injury prevention, develops countermeasures, implements prevention strategies and monitors trends and outcomes of interventions.

- National Coroners Information System (www.ncis.org.au) – National database of coronial information including contextual data, demographic data, medical causes of death, mechanism/objects involved in death etc. Useful for proposals relating to community health and safety strategies.

Regulation

- Business Licensing Authority (Victoria) (www.bla.vic.gov.au) – administers licensing and registration of a number of occupations.
- Business Licence Information Service (www.blis.business.vic.gov.au) – compliance information on a variety of licences, registrations and codes of practice.
- Productivity Commission (Commonwealth) (www.pc.gov.au) – Inquiry, research, and information papers on a wide range of industry regulatory arrangements.
- Parliamentary Inquiries (Commonwealth) (www.aph.gov.au/committee/inquiries_subject.htm) – lists all Senate, House and Joint current inquiries and recent reports by subject matter for the current Parliament.
- Ministry of Economic Development (New Zealand) (www.med.govt.nz/templates/ContentTopicSummary_606.aspx) – contains a range of useful guidance material including guidance on preparation of RISs and Business Compliance Cost Statements.

Worked examples

[Appendix D]

Some hypothetical examples of how to estimate the impacts of government regulatory proposals on small businesses are presented below.

[Example 1]

Child care worker attendance

To promote child protection, the Government considers requiring all child care centres to record and submit weekly records of the times that child care workers are on the premises.

A. Identify types of businesses affected and likely nature of impacts

Preliminary assessment indicates that the sector is characterised by one large business and a large number of small businesses.

B. Obtain preliminary feedback from a sample of businesses likely to be affected

Consultation with sector representatives indicates that the large business would use an electronic registry system across all sites that automatically keeps track of staff movements on to and off the premises and periodically submits reports. Small businesses indicate that they would keep manual records that would be collated and submitted manually.

C. Determine if there is a material variation in the impact between small and large firms

Preliminary feedback suggests there is a material variation in the impact between small and large firms.

D. Conduct detailed assessment of impacts on small firms

During detailed consultation, Large Childcare Inc. submits that instituting an electronic system across their 300 child care centres will cost \$150,000 in total but virtually nothing will need to be spent on ongoing costs once the system is installed. The Net Present value of the system for Large Childcare Inc. is $\$150,000/300 = \500 per crèche.

The smaller crèches estimate that the costs in lost staff time in filling in logs, maintaining records and submitting will be \$1000 per child care centre per year. At a discount rate of 5.5% and over a 30 year period, this equates to a Net Present Value of \$14,534 per small child care centre. ABS data indicates there are 2500 smaller crèches in Victoria. The total Net Present Value is therefore \$36.3 million.

The costs to small business are therefore disproportionate.

E. Assess alternative options

The first option is the base case of not introducing the new regulation. This option relies on existing regulations designed to protect children attending child care services, such as the training and experience requirements for child care workers. It has the advantage of imposing no additional costs on businesses. However, it is unlikely that this option will achieve the Government's objective of improving the safety of children cared for in child care centres.

The second option is based on feedback from consultations. Participants indicated that providing model record forms and a telephone help line during the implementation period, and allowing crèches to submit reports via email and on a less frequent basis, would reduce compliance costs for smaller crèches, without compromising regulatory outcomes. The cost saving was estimated to be \$200 per crèche initially, and \$100 per year over the 30 year period, which has an NPV of \$1548 per crèche or \$3.87 million in total.

F. Draft BIA or RIS

The draft BIA/RIS was completed, detailing the consultations and analysis undertaken.

[Example 2]

4WD access

The Government considers allowing increased access for 4WD enthusiasts to areas of State Parks and Crown Land.

A. Identify groups affected and likely nature of impacts

The likely beneficiaries of such a move would be:

- 4WD enthusiasts;
- 4WD manufacturers (large businesses);
- 4WD accessory suppliers (large and small businesses); and
- accommodation and tourist service providers associated with the parks (nearly all small businesses).

B. Obtain preliminary feedback from a sample of all businesses likely to be affected

Preliminary feedback indicated that all businesses would be likely to be affected to a similar extent.

C. Determine if there is a material variation in the impact between small and large firms

There is not considered to be a material variation in the impact between small and large firms. No further analysis of the impact on small businesses is therefore required. The policy officer should proceed to Stage F Draft BIA or RIS.

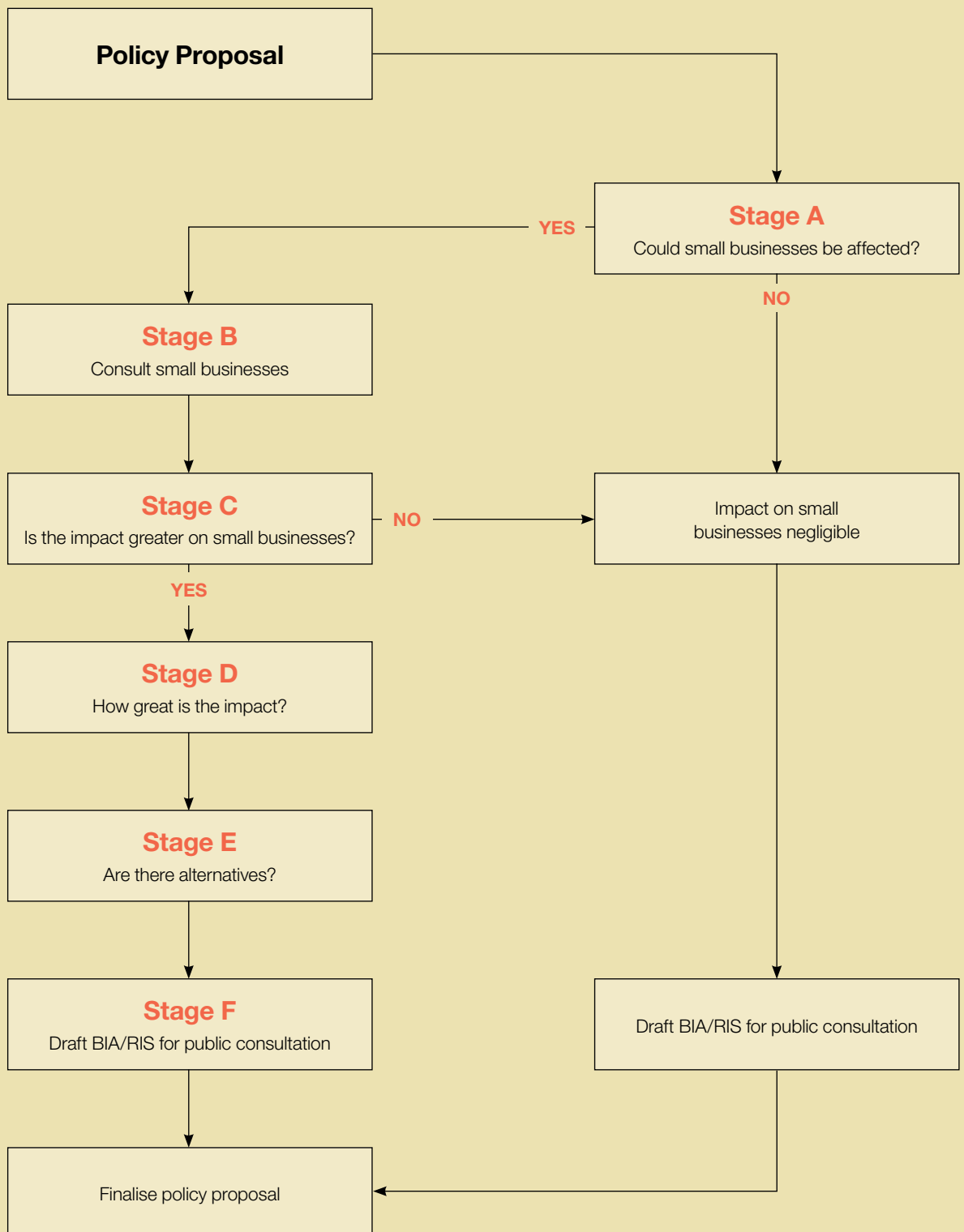
However, the other parts of the RIS process indicate that the likely environmental costs of the proposals (including the detrimental effects on ecotourism operators) significantly outweigh the benefits to these small businesses. The fact that most of the benefits accrue to small business should not necessarily be given a greater weighting just because they are small businesses. The proposal has to be assessed on its overall merits.

F. Draft BIA or RIS

The draft BIA/RIS was completed, detailing the consultations and analysis undertaken.

Small Business Impact Assessment Flowchart

[Appendix E]



Small Business Impact Assessment Checklist

[Appendix F]

A. Make a preliminary identification of small businesses likely to be affected:

- What industries are likely to be affected?
- What is the structure of industries likely to be affected – for example, number of businesses, size of businesses, ownership type (sole proprietor, partnership, Pty Ltd, etc), geographic distribution?

B. Scope issues with a representative sample of small businesses:

- Contact a small number of representative businesses.
- Obtain feedback about the likely affects of the proposal:
 - How serious is the problem the proposal seeks to address?
 - What changes will you have to make to the way your business operates?
 - Are there other ways that the government could achieve its objective?

C. Determine if there is likely to be a disproportionate effect on small business:

- If no, prepare draft RIS/BIA for public consultation, including details of consultations to date.
- If yes, proceed with the next stage of the small businesses analysis.

D. Gather detailed data about likely impacts on small businesses including costings:

- Contact a wider sample of representative businesses.
- Obtain feedback about likely effects of proposal, including estimates of costs.
- Determine if the proposal will have a disproportionate effect on small business.

E. Assess alternative options

- Identify alternative options for achieving objectives, based on feedback from previous consultations and other research.
- Compare cost implications with those of the proposal.

F. Prepare draft BIA/RIS

- Summarise details of feedback obtained from small business analysis:
 - Industry structure
 - Consultation to date
 - Options for addressing the problem
 - Estimates of costs and benefits of each option
 - Implementation issues
- Provide feedback to participants on:
 - How policy was influenced or, if no changes were made, why not
 - How they can have further input into the regulatory process

Notes

A Victorian Government initiative

