



Ref: WC00935/10

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO BOX 3131
CANBERRA ACT 2601

Dear Dr Chadwick

I refer to your correspondence of 1 June 2010 inviting WorkCover to comment on the Agsafe Limited application for revocation and substitution of authorisations.

While WorkCover is supportive of industry initiatives that enhance knowledge or compliance with legislative requirements, there is no affiliation between OHS legislation and the requirements of the program. The current NSW OHS legislative framework does not recommend or require adherence to the Code of Conduct administered by Agsafe, nor does the proposed national model Work Health and Safety legislation.

I note that government regulators (such as WorkCover) undertake permissioning and licensing activities with appropriate regulatory assessment and oversight, including periodic regulatory impact analysis and public consultation. In part, this is to ensure these activities do not unnecessarily contribute to the burden of "red tape" on businesses and the community. The use of a private permissioning arrangement, such as the Agsafe program, may be seen by business as additional "red tape" in an environment where governments are actively seeking to reduce "red tape" for business.

Thank you for the opportunity to consider this application.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Lisa Hunt', written over a light grey rectangular background.

LISA HUNT
CHIEF EXECUTIVE OFFICER
24 June 2010

WorkCover. Watching out for you.

WorkCover NSW ABN 77 682 742 966 92-100 Donnison Street Gosford NSW 2250 Locked Bag 2906 Lisarow NSW 2252
Telephone 02 4321 5000 Facsimile 02 4325 4145 WorkCover Assistance Service 13 10 50
DX 731 Sydney Website www.workcover.nsw.gov.au

WC03116 0208