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Driving Business Success for Consulting Firms in the Built and Natural Environment

8 October 2012

Alex Marsden
Marsden Jacob Associates
Level 1, 220 St Georges Terrace
PERTH WA 0000

Dear Mr Marsden,

Re: National Work Health and Safety Legislation Harmonisation

I am writing on behalf of Consult Australia in response to the *Consultation Regulation Impact Statement – Information and Issues Paper* regarding Western Australia's proposed move to join a uniform, national Work Health and Safety scheme in Australia.

Consult Australia is the industry association representing professional services firms within the built and natural environment. Our member firms services include, but are not limited to: design; architecture; technology; engineering; planning; landscape architecture; surveying; cost consulting; project management; and management solutions. We represent some of the industry's biggest players in this space with our 270 member firms collectively employing more than 60,000 staff.

Consult Australia strongly supports the implementation of nationally consistent WHS legislation through model legislation because it will ultimately deliver improved workplace practices and compliance, whilst also improving business efficiency, reducing red tape and creating certainty for all stakeholders.

The adoption of nationally consistent WHS legislation will reduce bureaucratic procedures and make excessive regulation redundant. It will also enhance stakeholder compliance in their duties by moderating time-consuming WHS management procedures, such as information, training and education that promote business efficiency. Importantly, nationally consistent WHS legislation will deliver improved confidence for all stakeholders to equally share one set of defined duties to provide a safe working environment.

We appreciate that specific concerns have been raised by some stakeholders. However, we believe that the importance and benefits of a uniform, national WHS scheme should overcome any of these individual issues.

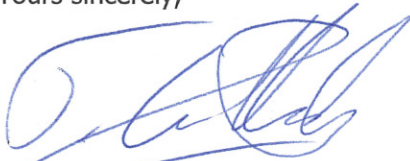
As other jurisdictions have passed the model legislation through their parliaments, we have begun to develop guidance tools to assist our member firms in transitioning to the new scheme. Should the national WHS laws not be passed in Western Australia, this would represent a significant additional regulatory burden for national and global organisations doing business in Western Australia.



Should you or your office wish to further discuss the matters we have raised in this letter, please feel free to contact Consult Australia's Western Australia State Manager, Josephine Howlett, on (08) 9324 3383 or josephine@consultaustralia.com.au or our National Senior Legal Policy Advisor, Robin Schuck on (02) 9922 4711 or robin@consultaustralia.com.au.

I hope you will consider our position in determining Western Australia's next moves on this important reform.

Yours sincerely,



Jonathan Cartledge
Director of Policy