

Comments to Regulatory Review Team on Licenses and Regulatory Burden

The following comments are made in relation to the review of regulation and unnecessary regulatory burden:

Swimming Pool Regulation

The regulation in regards to backyard swimming pools are generally excessive. Self-regulation of backyard swimming pool fences may be a better option. Additionally, recent proposals to increase swimming pool regulation that advocate additional registers of pools or an increased inspection regime would impose large costs on swimming pool owners and local councils and would be unlikely to pass a CBA. I have an academic paper suggesting the CBA of swimming pool regulation is at best marginal.

Licenses

Drivers Licenses

Many periodic licenses would seem to be priced at levels above cost reflectivity and last for too short a timeframe. Drivers licenses would be a prime example. The duration of these licenses could be extended where it is practical to do so. Ie, for full drivers licenses (that can last for 1, 3 or 5 years there should be the option of a 10 year license (same duration as a passport.) The prices of licenses may also be above cost reflective levels (\$162 for 5 years for a plastic photo card is excessive and is simply a tax).

The age for requiring elderly drivers to get a medical certificate/ doctors certificate could be increased with current high health standards. Again CBA.

Fishing Licenses

Fishing licenses for recreational fishermen should be abolished. The very minor costs that these fishermen impose could be covered through either general revenue or fishing licenses for commercial fishermen.

Other Licenses

All other photo licenses/other licenses could also have their validity dates extended e.g, proof of age cards etc.

Car Registration

There are a number of regulatory burdens in relation to car registration. One of the primary burdens specific to NSW is the necessity to obtain a pink slip (vehicle inspection) for vehicles over 5 years old. This imposes a very large burden in terms of red tape, time and expense for car owners, and administration, time and expense for mechanics that conduct these inspections (with very little return). Victoria does not require vehicle owners to obtain a pink slip (I believe many other states do not require an inspection either).

Additionally, there is already a framework in place that allows vehicles with defects to be taken off the road. Police can issue motorists with a defect notice that requires them to repair any defects identified before the car can be driven freely again. (I believe this

exists in other states too). There is a duplication of regulation and the evidence supporting periodic motor vehicle inspections is again marginal.

I doubt the requirement for roadworthy inspections would pass a CBA when there is already another framework in place. I would think it would be highly negative.

The requirement for periodic motor vehicle inspections should be removed.

A paper can be provided on this suggesting further evidence is needed, the contribution of vehicle defects to crashes may be exaggerated.

If considered absolutely necessary, a roadworthy inspection could be required when a registered vehicle is sold. I believe this approach may be used in other states.

Registration fees

Green slip fees appear to have been increasing above CPI due to the addition of MCIS levies to green slips. Perhaps these levies would be better funded from general revenue.

Registration (blue slip) fees have been increasing with CPI although road conditions have not been improving, if anything they are getting worse. The motor vehicle tax should also be removed. Weight-based charging for cars should be removed as the marginal damage done by a slightly heavier car to roads would be extremely negligible when compared with a truck. Not cost-reflective. The registration fee is essentially a tax and is not cost-reflective.

Charges for Customised Number Plates

Again this is not cost-reflective and is simply a tax. The fee should be a one-off that reflects the cost of production of the plates. Number plates should also be able to be re-issued to save costs (not currently done).

Requirements for Learner Drivers to Undertake 120 Hours of Driving

I believe this would be unlikely to be justified by a CBA. It merely encourages those instructing drivers to overstate actual hours driven as the requirement is extremely excessive. It may also benefit driving schools who have an interest in the regulation.

Restrictions on Types of Vehicles able to be driven by L and P-platers

CBA. Also the RMS may possibly make exemptions (have to check this) where the family car is a blacklisted vehicle in return for a fee (ie, it is a tax).

Taxi Licences and Regulation

Taxi licenses have been kept in place largely to benefit the holders of the plates. They are not benefitting customers or drivers, they are merely increasing fees. The Government should either issue many more plates (thus pushing down plate values) and generating additional revenue for the government, or, preferably, the taxi industry should be largely de-regulated in order to encourage private providers. This would also allow differing levels of service to be provided at different prices, flat charges could be negotiated with drivers as occurs overseas. De-regulated minicabs could compete as

occurs in the UK or completely private providers could come into the market if plate fees were substantially lowered/removed.

Local Council

Regulations on the removal of trees could be standardized. Ie, if a tree is within 5 meters of a house you should not be required to get a permit to remove it as it presents a danger to the house.