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Government of South Australia

Department of Trade and Economic
Development

COMPETITIVENESS COUNCIL INDUSTRY REVIEW

WINE GRAPE GROWING AND WINE MANUFACTURING

Final Report

Office of the Economic Development Board

August 2008

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1. Executive Summary

The Competitiveness Council was created in June 2006 to identify, develop and champion practical measures and reforms to enhance South Australia's competitiveness.

One of its key projects is to help the State Government meet the challenging target of reducing business red tape by at least 25% or \$150 million by July 2008. An important part of this process is a series of industry reviews involving close consultation with business owners and operators, industry representative bodies and key unions. The aim is to identify logical and achievable ways to reduce the time spent and costs incurred by business owners in complying with State Government rules and regulations.

The review of Wine Grape Growing and Wine Manufacturing industries is one of a series of industry reviews undertaken for the Competitiveness Council, a subcommittee of the Economic Development Board. The review process is supported by the Department of Trade and Economic Development (DTED).

The Department of Primary Industry and Resources SA (PIRSA) has been of great assistance in supporting the review, which was initiated following a proposal from the South Australian Wine Industry Council (SAWIC).

2. Background

According to the South Australian Wine Grape Utilisation and Pricing Survey published by the Phylloxera and Grape Industry Board SA in 2006, there are over 3,500 grape growers in South Australia covering a total area of more than 70,000 hectares (see table 1).

According to *The Australian & New Zealand Wine Industry Directory 2007*, there are 563 wine producers in South Australia (see table 2). South Australia accounts for more than 50% of the national total wine production and more than 60% of the national total wine exports.

Table 1: Number of wine grape growers and total plantings by property size in SA 2006

Property size	Number of growers	Area (hectares)
Less than 10 hectares	2042	9409
10-24ha	900	14,171
25-49ha	365	12,336
50+ha	256	38,499
Total	3563	74,414

Source: Phylloxera and Grape Industry Board SA, SA Wine Grape and Utilisation and Pricing Survey 2006

Table 2: Number of wine producers in SA by tonnes crushed

Tonnes crushed	Number of wine producers
Less than 10	50
10-19	70
20-99	202
100-449	130
500-999	34
1000-2499	26
2500-4999	9
5000-9999	14
10,000 or more	18
Unknown	10
Total	563

Source: *The Australian & New Zealand Wine Industry Directory 2007*

South Australian Regulations/Acts that businesses within the wine manufacturing and grape growing industries need to comply with cover the following areas: liquor, development approvals, environment, irrigation and water, heritage, native vegetation, roads, food and sanitation, trade measurement, bio-security, chemicals and industrial waste, workers' compensation, and levies. See Attachment 1 for a list of Regulations and Acts.

3. Scope

The objectives of this review are to:

1. Identify steps that the State Government could take to:
 - Reduce the compliance burden on business (e.g. by simplifying regulations and licences currently causing the biggest problems).
 - Remove or reduce the number of any unnecessary, overlapping, repetitive or inconsistent regulations.
2. Identify ways in which technology could be used to reduce 'red tape' and simplify business relationships with State Government.

Issues relating to Commonwealth and local government regulation are not technically within the scope of this review (See Attachment 2 for a list of local government issues). However, because of the large number of issues raised in relation to local government, they have been listed and referred to the planning review team and PIRSA, which is responsible for the Office of Local Government.

4. Methodology

The review began with desk-top research into Government regulations covering this industry, followed by meetings with representatives from SAWIC. The Grape and Wine Group in PIRSA recommended a list of industry associations and individual businesses in all wine regions to be included in the consultation process. This list was supplemented with other businesses contacted independently by the review team.

The review further involved:

- One-on-one interviews with 10 business owners/managers.
- Formal submissions from five businesses and industry groups.
- An invitation to the Liquor, Hospitality and Miscellaneous Union to contribute to the review process.

In conducting interviews with people in the industry, the review team used a prescribed set of questions (Attachment 3) as a starting point for discussion. It was also explained that the aim of the red tape industry review was to find

practical, logical ways to reduce regulatory time and costs, without compromising social, environmental and economic objectives.

An Industry Review Reference Group was appointed to review recommendations/issues arising from the review. It comprised:

- Mr John Rau, MP – Convenor
- Mr Raymond Garrand, Chief Executive, Department of Trade and Economic Development
- Mr Robert Freeman, Department of Water, Land and Biodiversity Conservation
- Mr Bill Pryor, Office of the Liquor and Gambling Commissioner
- Mr Peter Siebels, Board Member, Business SA (also Chairman of Partners, KPMG SA)
- Mr Brian Smedley, South Australian Wine Industry Association (SAWIA)
- Mr Simon Treloar, Primary Industries and Resources SA
- Mr Paul Clancy, Wine Grape Growers Council SA
- Mr Robert Ferguson, Small Business Development Council

A number of relevant Government agencies were consulted, so that the review team could gain a more thorough understanding of various regulations and licences, and of specific issues raised by businesses. They included:

- Office of the Liquor and Gambling Commissioner (Justice portfolio)
- Primary Industries and Resources South Australia (PIRSA)
- Department of Health
- Department for Transport, Energy and Infrastructure (DTEI)
- Department of Water, Land and Biodiversity Conservation (DWLBC)
- Department of Trade and Economic Development (DTED)
- Environment Protection Authority (EPA)
- SafeWork SA, Department of the Premier and Cabinet

Some issues raised by respondents were not included in the analysis as the information provided was found to be inaccurate, out of scope or no longer applicable.

5. Recent South Australian Government Initiatives

In January 2008, the Minister for Consumer Affairs announced innovative changes to the State's wine labelling requirements. The new rules further reduce red tape by allowing South Australian winemakers to use labels already utilised in countries around the world, which will significantly expand export opportunities. The new regulations allow wine producers to place the measurement statement anywhere on a wine container (excluding the base or cap) provided it can be viewed together with the country of origin, alcohol content and product description. It is estimated that the new labelling system will save the State's wine industry \$14 million a year.

6. Compliance Issues

6.1 Water Trading, Allocation and Permits

Issues:

- The water trading process is too slow
- It requires numerous approvals

Discussion:

6.1.1 Transfer of Water Licences

Businesses have suggested that the process of water trading is too slow. It is a time-sensitive issue because of the drought. It costs over \$600 and takes more than 40 days to transfer a temporary water licence and there are no guarantees of approval. For example, two businesses had agreed to trade water and lodged an application. It was approved but too late; the Government agency allegedly told the businesses the delay was due to a lack of resources.

Numerous approvals are required before permission to transfer water can be effected. Streamlining the process and reducing the number of approvals is recommended.

Delays are also caused by a lack of understanding and of scientific knowledge on regional water issues and crop requirements (within government).

6.1.2 Water Trading

South Australia is part of a national approach to water trading being developed under the National Water Initiative (NWI). This will affect the State water licensing and permit system over time, although current South Australian initiatives in this area are being developed, consistent with the national approach.

South Australia participated in the Murray-Darling Basin Commission's pilot project on interstate water trading, which operated between 1998 and 2006 and implemented the Council of Australian Government's (COAG) 1994 water reform requirements. The project intentionally focused on entitlement (permanent) trade of high-security water products. At the same time, the allocation (temporary) of interstate water market expanded and the intra-state market for entitlement and allocation trade continued to be highly active.

Following two external reviews, knowledge gained from the pilot scheme has resulted in improved processes at all levels and a major expansion of the geographic area available for trade. These changes include moving to tagged entitlement trade from exchange rate entitlement trade and substantial increase in the allocation trade market.

Entitlement trade numbers and volumes in 2006/07 exceeded nearly all figures of the pilot trade period 1998-2006; 2006/07 also was the busiest interstate allocation trade year on record. Such an increase in numbers of trades has stretched all participants in the water market: irrigators, brokers and administrators. Numerous steps are in place to improve the efficiency of the system.

The key outcomes of the national approach to water trading will be to meet the COAG water reform objectives of:

- Improving the efficiency of consumptive water use, especially irrigation.
- Contributing to economic sustainability by encouraging water to move to its highest-value use.
- Contributing to resource and environmental sustainability.

6.1.3 Water Allocation and Permits

Currently, 17 water allocation plans have been adopted and another five are being prepared; many are on the DWLBC website, one is being formatted to go on the web page and the others will be uploaded as they are completed. The website is <http://www.dwlbc.sa.gov.au/licensing/index.html>. The water resources in these areas require management to provide for sustainable development, which means specific activities must be licensed.

Other activities across the State, such as drilling for water, require a permit. An independent review of the DWLBC water permit program showed that clients were satisfied with the information and level of support they received, but it reinforced the findings that the time taken to progress permits was longer than anticipated. This has been recognised and two red tape reduction projects have been put in place:

- The first project is the transfer of the initial assessment process to the Regional Natural Resources Management (NRM) Boards. It is expected that this will cut at least two weeks off the initial assessment process. Also, by doing the assessments the NRM Boards will have knowledge of the issues when they comment on the draft recommendations concerning the permit, which will further reduce the processing time and may increase the value of the comment.
- The second project is that a business case has been developed to review the licensing forms with an aim to improve the electronic capability of the forms (currently they are PDFs which can be downloaded, filled in and submitted). The project will assess and develop an online form and in the longer term examine the possibility of introducing an electronic payment capability.

Although different activities are licensed in different regions, there are commonalities and the front end of the forms could be the same. Through careful development, the process can guide a client to the correct permit form to fill in (currently the web interface does not do this).

The project is designed to provide automatic stop points if the information provided is not seen as correct. Up to 50% of the forms are not correctly filled in, which means they are delayed unnecessarily in DWBLC and the permit seeker has to spend more time correcting the mistakes. The saving in time may be up to a week. Perhaps more importantly, the process will be more customer-focused and decrease the confusion for first-time water permit applicants.

Government Response:

The South Australian Government has agreed to:

- Improve the efficiency of the water market system through active participation in the NWI.
- Improve the electronic capability of the water licensing system.
- Complete a review of the effectiveness of current approaches to interstate water trading in accordance with NWI requirements and to develop a national standard for processing times by December 2009.
- Seek agreement from the Southern Murray-Darling Basin Interstate Water Trade Working Group and associated Interstate Trade Operations Panel to a consistent approach to water trading in the basin, including development of compatible water registers, by December 2009.
- Review and publish the South Australian DWLBC customer service standards for water licensing on the internet and improve from 60% to 70% the percentage of water licence trades meeting the established processing time by January 2009.

6.2. *Producer's Licence/Liquor Licensing*

Issues:

- The producer's licence regime should allow more flexibility
- Transfer of a producer's licence takes too long
- Obtaining a responsible person certificate for serving alcohol is a complex process
- Applicants for a limited licence are required to fill in the same information each time

Discussion:

The regime requires flexibility: to allow one winery to operate with another winery or wineries to reduce costs for community events; to allow the sale of wine by the glass at community events; to allow producers who own more than one winery to use the one cellar door for affiliated companies.

Industry has argued that the producer's licence should cover off-premises events, such as the Tour Down Under, which requires a separate permit for the day the event is supported. It is very time-consuming to apply for extra permits (limited licence) and each application costs more than \$30. Permits are required for sales by the glass and to sell beer. Approval requires a letter of consent from local government and then approval from the Office of the Liquor and Gambling Commissioner (OLGC).

The same paperwork (including maps) must be completed for each application. Businesses have argued that only changes to information should be required for similar subsequent events.

Small regional wine businesses which showcase their region through supporting local events have to apply for a limited licence for each day of an event and pay for a stand and/or sponsor the event. Small producers pay the same as large producers for a limited licence. Limited licences are regarded by some small businesses as a revenue-raising exercise for the OLGC.

Moreover, security requirements for minor cultural activities are found to be onerous.

Industry has argued that businesses with good records should be given latitude. For example, one company spent four months trying to transfer the location details on its producer's licence.

In April 2007, a South Australian Wine Industry Association discussion paper proposed a legislative change to allow producers to supply their product (only) by sample and sale outside the 'licensed premises'.

The Minister for Consumer Affairs is inviting public comment on proposed amendments to section 39 of the Liquor Licensing Act 1997 to:

- Allow for a 'collective cellar door'.
- Enable licensees to operate from more than one venue.
- Enable a producer to sell all forms of liquor – not just the producer's own product – in a designated dining area.
- Enable licensees to include other producers' products in samplings, allowing them to offer comparative tastings.
- Enable producers to hold samplings and to sell outside the licensed premises where that venue is noted on the licence, such as local festivals and farmers' markets.
- Provide the licensing authority with the power to exempt a producer from the "substantial proportion" requirement in extenuating circumstances, such as crop failure.

The discussion paper covers many of the issues. Consistency of industry training requirements has not been resolved nationally. Although responsible service of alcohol is available as a nationally accredited training module, different regulatory regimes have different training requirements.

Government Response:

The South Australian Government will consider amendments to the Liquor Licensing Act 1997 to:

- Allow for a producer to operate a collective cellar door
- Enable producers to hold samplings and to sell from more than one premises
- Enable a producer to sell all forms of liquor in a designated dining area with or ancillary to a meal provided by the producer.

It is also intended that the Responsible Person approval process will be simplified, including providing some online capability.

6.3 Native Vegetation Removal**Issue:**

- Applications to remove native vegetation are incredibly time consuming and costly

Discussion:

Concerns were raised about the processes involved in seeking to remove native vegetation. Some businesses noted that applications are incredibly time-consuming and costly. There is a need to engage consultants and no certainty of approval. A general assessment costs under \$500 and an assessment involving a single tree costs under \$120.

The wine industry had a spike in clearance applications in the late 1990s and early 2000s, but since 2003 there have been relatively few.

There are two options for having an area assessed. DWLBC can assess the application or a proponent can pay and use the services of an accredited contractor to undertake the assessment and provide the report for the Native Vegetation Council. The latter approach is used in 40% of all applications to the Native Vegetation Council.

The Native Vegetation Council has recently formed a Native Vegetation Assessment Panel, which meets more frequently than the Council and has been delegated the responsibility of assessing clearance applications to speed up the process.

Although native vegetation is not a major issue in terms of other resource management problems facing the industry (such as water needs, salinity, waste removal), DWLBC is reviewing its processes to look at ways of meeting the Government's customer charter, providing 'plain English' interpretation of the Act and regulations and providing information sessions for development boards and local government.

It is important to note that not all wineries have the same view on the need to remove trees from vineyards, and some very successful companies have used a number of approaches to keep and enhance the native vegetation on their properties.

Government Response:

The South Australian Government has agreed to the following:

- Promotion with industry of newly developed guidelines related to native vegetation removal.
- To undertake an industry consultation as part of a review of the native vegetation development application by June 2009.

6.4 Fruit and Plant Protection Amendment Act

Issue:

- Certification (hard copy only) is required to accompany produce to meet the import requirements of interstate markets. Electronic submission would reduce time and resources.

Discussion:

The issue of concern is the timeliness for arrangement of Plant Health Certificates. Certification (hard copy only) is required to accompany produce

to meet the import requirements of interstate markets. Electronic submission would reduce time and the use of resources.

Electronic certification for interstate trade has been considered at the national level by the Domestic Quarantine and Market Access Working Group within the Primary Industry Ministerial Council. Currently, it is considered that the cost of trying to develop such a system would outweigh the potential benefits to both government and industry. The Certification Services Working Group, under the supervision of the Domestic Quarantine and Market Access Working Group, will undertake a review in which it will develop national standards and procedures for the consistent operation of certification services for domestic market access in Australia. It will also review and develop Interstate Certification Assurance protocols and procedures and oversee the implementation of the national Interstate Certification Assurance Scheme.

In South Australia, requirements for certification are specified in the Plant Quarantine Standard South Australia and not in either the Act or by Regulation. The proposed new plant health legislation will not change this process and this will ensure that if a suitable system becomes available in the future, the Minister's approval is all that will be required to allow adoption of e-Certification.

Government Response:

The South Australian Government has agreed to the following:

- Continuation of work to develop national standards and procedures for consistent operation of certification services for domestic market access in Australia.

6.5 Pest Controllers Technicians Licence/Dangerous Substances Regulations

Issues:

- Training required for pest controllers' licences is too time-consuming and costly
- Some vineyard contractors are unlicensed

Discussion:

It was suggested by some businesses that a qualification to spray chemicals in vineyards should be available and should be lesser/limited in comparison to the current Pest Controllers Technicians Licence.

Government Response:

The Industry Review established that this matter was dealt with in 2005 and implemented from 1 January 2006, when a licence requiring vastly reduced competencies was introduced for vineyard pest control technicians. The Department of Health believes that reducing the competency requirements any further (was 274 hours, now 64 hours) would leave operators with so little knowledge they would present a risk to both themselves and the wider environment.

6.6 Industry Levies

Issues:

- Levies are confusing and time-consuming
- PIRSA is slow in releasing money back to the industry
- The administrative processes involved in setting up the Barossa Grape and Wine Association was too slow, with the result that the association could not be established until 2008
- One winemaker said he spent time collecting levies from growers on the Government's behalf without being compensated for his work and time

Discussion:

A range of issues were raised in relation to the imposition and administration of levies, which are imposed under a number of Commonwealth/State Acts and Regulations, to support a broad range of wine industry activities.

6.6.1 Lump Sum Payments

It would be very difficult to implement a single levy to support all the existing activities. PIRSA recently changed its payment system to allow winemakers to make levy payments electronically and it will continue to work with industry to ensure the payment of levies under its administration is simplified and streamlined.

The option of single levy collection is potentially more costly to the State Government and the specific industry sector/association. Inconsistencies exist between the Commonwealth and the State, suggesting that complications would arise from a single jurisdiction collection of a lump payment, resulting in very small savings to business.

Because the wine industry in South Australia organises itself on a regional basis, the regional wine industry associations that receive payments from industry funds are likely to oppose any consolidation. Nevertheless, it is noted that the Primary Industry Funding Schemes Act 1998 does allow a fund to be administered by an approved society or association or a board of trustees.

PIRSA would look favourably on any initiative by industry to transfer some or all of the existing wine industry funds into the administration of industry if it meant the consolidation and simplification of the system without a resulting loss of accountability.

6.6.2 Release of PIRSA Funds

The various wine industry funds established by regulation under the Primary Industry Funding Schemes Act 1998 generally require wineries to remit contributions at the end of each financial year. It is not possible for the funds to run into deficit so industry associations must wait until most of the

contributions are received before applying for a payment from the fund. They generally do so after seeking the support of their members at annual general meetings, which usually take place in September. The whole process is generally completed around October/November each year. The associations receive the first and second quarter payments simultaneously.

PIRSA, as the fund administrator, also has to ensure that, because the levy is voluntary, some money is retained to ensure adequate funding is available for refunds if necessary.

6.6.3 Setting up regional associations was slow

Good legislative policy requires that regulations introduced under the Primary Industry Funding Schemes Act 1998 that apply a levy to produce should apply only to produce sold after the regulations take effect. In the case of the Barossa Valley the regulations came into operation in November 2007 and applied to grapes delivered during the 2008 vintage.

6.6.4 Compensation for Time

It is not appropriate for winemakers to be compensated for their time in processing the levies because as contributors they are entitled to receive direct benefits from the fund. The regional funds were established at the instigation of winemakers and the money is collected for the benefit of the wine industry, and not for the Government.

Setting up a regional association to accept payments from a new fund is a separate issue. It is the responsibility of the fund's contributors to establish a body representing the contributors.

Government Response:

The South Australian Government has agreed to the following:

- PIRSA will pursue the possibility of the wine industry administering the existing wine industry funds.
- PIRSA will continue to work with industry to ensure the payment of levies under its administration is simplified and streamlined.

6.7 Communication between Government and Industry

Issues:

- Businesses should be offered the choice between hard copies and electronic copies when communicating with the Government.
- Government at different levels should share information/data rather than surveying businesses separately for similar information/data.
- Public servants should provide better customer service.

Discussion:

Participants raised a number of matters related to communication between Government and industry:

6.7.1 Internet Access

As internet access in regional areas tends to be unavailable without notice and for extended periods, it would be difficult if returns could be lodged only on the web. Sending information (especially long files and/or colour attachments via email) is seen by some businesses as a cost-shifting exercise by Government rather than a use of technology to reach regional people – 'We try to keep printing costs down by recycling paper and only printing critical information so reports should always be posted,' one business said. 'Until broadband is available right across the State, hard copies of documents should be easily accessible on request.'

As the onus is on business to know of changes made by Government, it would help greatly if departments updated their information when changes were made.

Although small business is seen as a major driver in the SA economy, there appears to be little, if any, recognition that they form the core of most regional communities. Too often, business legislation is based on what is best for Adelaide, with no allowance for isolation, distance and the viability of regional communities.

The Office of Small Business within DTED has recently launched a comprehensive business information web presence within its website www.southaustralia.biz. The site contains a wide range of information and links to Commonwealth, State and local government and industry web sites. The Office of Small Business has incorporated a 'what's new' facility on the Business Licence Information System website to provide an efficient search facility for business in regard to changes in licence and permit information. All information is made available in either hard copy or electronic format. All customers are given the option of receiving either or both; 75% choose the electronic option. Legislation does not seek to favour metropolitan or regional South Australia.

6.7.2 Survey Overlap

It seems there may be duplication of data collection by various government agencies including PIRSA, the Australian Bureau of Statistics (ABS) and the Australian Bureau of Agricultural and Resource Economics (ABARE). It is likely these agencies have slightly different data needs in relation to scope or time. Where updates only are required this could be done by telephone.

This issue is noted by the Productivity Commission report recently released, and is identified as one of the main burdens to be addressed immediately: 'Improved coordination between ABARE and other government agencies in collecting farm data could reduce the time spent by agricultural producers completing surveys.'

Streamlining data collection can be a goal of reducing regulatory burdens. At the very least, in trying to reach this goal, those agencies which approach industry for survey information need to be able to articulate how any new information requests build on previous data requests, and also acknowledge that industry involvement is critical and appreciated.

6.7.3 Improving Service to the Public

Businesses have alleged that there appears to be a greater emphasis on compliance rather than on service/helpfulness. It seems to be a risk

management exercise whereby businesses/applicants are required to seek expert advice when dealing with Government (local and State). In addition, they have noted, there are too many Government sites, and each Government department wants a fee for everything.

All agencies are now preparing to measure customer satisfaction in line with the South Australian Strategic Plan (SASP) target 1.7. A number of agencies have already conducted a survey using the eight core questions of the Common Measurement Tool for Customer Satisfaction recommended by the Government Reform Commission.

A cross-agency Customer Service Network has been formed to share strategies for improving customer service in line with SASP target 1.7 to 'increase the satisfaction of South Australians with government services by 10% by 2010, maintaining or exceeding that level thereafter'.

Across the whole of government there are several initiatives aimed at improving service delivery to business and the public. These include a single entry point to the whole of government, with the objective of delivering improved customer service through simplifying and streamlining the way citizens and businesses interact with the State Government and through providing face-to-face, telephone and internet options.

Concurrent with this is an initiative to allow intranet access between government departments to improve information sharing.

Government Response:

The South Australian Government has agreed to the following:

- All agencies to use the Common Measurement Tool to assess the satisfaction of customers, in relation to the red tape obligations imposed by the Government.

6.8 EPA Regulations

Issues:

- EPA regulation is open to interpretation
- Some EPA concerns are unrealistic
- The roles of private assessors, the EPA and councils are not clear
- There are overlaps between the EPA and the National Pollutant Inventory, the National Packaging Covenant and Container Deposits Legislation.

Discussion:

Various concerns were expressed about the role of the EPA and costs involved in complying with EPA requirements. Concern was expressed that EPA regulation is open to interpretation and that the respective roles of the EPA and councils are not clear.

Compliance is a major ongoing cost. Business has fears of an ever-rising bar based on a 'what if' (what if this happens?) attitude. Some of the EPA's concerns are seen as unrealistic.

6.8.1 Role of the EPA

The EPA says that over the past few years it has focused efforts to reform its approach to administering legislation, with the intention of ensuring that the environmental requirements placed on business by the EPA are outcome-focused and risk-based. The benefits of this approach include that the requirements are commensurate with the environmental risks at the site, that business can develop innovative strategies to develop good environmental outcomes, and that it is possible to avoid the 'one size fits all' approach.

According to the EPA, its achievements in this area have previously focused on developing guidance, systems and training for staff to more consistently apply this approach: various guideline documents detailing the approach are provided on the EPA website. The agency is now implementing the approach more widely in its dealings with regulated operators.

The EPA says it is aware that its adoption of an outcome-focused, risk-based approach may have given the impression there are differences (or inconsistencies) in how it is regulating industry operators. It says it has worked hard to address this perception and will continue to do so.

In 2006 the EPA undertook a substantial review of its customer service. One of the recommendations from this review was to more clearly define to the community (including regulated operators) the role of the EPA. Since then the EPA has been working on this and other recommendations of the review.

Defining the role of the EPA will not, however, define the various roles of private assessors and councils. The role of private assessors will depend on the contractual arrangements under which they are engaged, and the role of the councils may also vary, depending on the council concerned (e.g. some may have development officers; others may not have these resources).

6.8.2 Myriad of environmental regulation

Confusion exists between objectives of the EPA, the National Pollutant Inventory, the National Packaging Covenant and Container Deposits Legislation.

The National Pollutant Inventory (NPI) is a national program to collect and make publicly available emissions information from major industries within Australia. It was developed after the Rio Earth Summit of 1992, where nations were encouraged to develop emissions inventories, and reflects similar programs in many other developed countries. The EPA coordinates the delivery of the NPI program in South Australia, and also requires some businesses to undertake additional site-specific monitoring to keep environmental issues in this area under review. In some instances the data requirements for these two programs differ.

In order to minimise the duplication of reporting for businesses, the EPA has undertaken a number of reform programs over the past few years, including:

- Refinement of the licensing fee structure that allows operators to choose to use NPI data for determination of the load-based fee component of their licence fee (instead of having to separately collect and/or report).
- Reassessment of the regulatory monitoring and testing required by the licence to ensure that it is risk-based and targeted. A dedicated program was undertaken in 2006 that resulted in considerable savings to the industry.

The National Packaging Covenant and the Container Deposit Legislation (CDL) are two programs intended to address waste and litter problems associated with sale of products. The covenant between government and industry aims to have producers of packaging material take more responsibility in managing the waste that needs to be disposed of by the ultimate consumer. The CDL is a State-based litter reduction program relating to beverage containers. Wine bottles are generally exempt. The EPA does not believe there is any overlap between these programs, although it is committed to remaining aware of this issue.

Government Response:

The South Australian Government has agreed to the following:

- The EPA to more clearly define its role to the community and to continue efforts to minimise the duplication of reporting for businesses.
- The EPA to be invited to attend Wine Council meetings as an observer or participant.

6.9 Wine Grape Industry Act 1991

Issue:

- Vastly different views were expressed about the operation of and necessity for the Wine Grape Industry Act 1991

Discussion:

The Act provides a schedule of payment terms for grape growers. If the schedule is not adhered to by the purchasers (wineries), penalties are applied.

One respondent to the review said: 'The Act is nonsense and does not allow market forces to determine the fate of the industry ... It inhibits growth in the industry because it regulates the wineries' cash flow ability; it drives the price of grapes down and it promotes a proliferation of vineyard plantings. Most, if not all, growers would be happy to accept more flexible terms – such as nine equal payments from April to December.' Another grower suggested that three base payments according to the schedule and a 'bonus' at a later date would be appropriate.

Concern was expressed about "...continual advice from PIRSA regarding penalties for non-compliance". Another grower expressed the view that the system of payments for growers requires greater support to ensure that growers are paid when they are entitled to be paid.

Section 6 of the Wine Grapes Industry Act 1991 enables the Minister to fix terms and conditions relating to the time within which processors must pay for wine grapes. The terms and conditions of payment must not differentiate between processors and are implicit in every contract for the sale of wine grapes to a processor.

The penalties mentioned for non-compliance are recoverable by a grower only where that grower takes action in claiming payments and penalty interest from a winemaker who is in default of the payment provisions. They are not enforceable by Government.

PIRSA sends out an annual notice reminding wineries of their requirements under the Act and the Ministerial Order. The notice makes it clear it is for information only.

The South Australian Wine Industry Council discussed the Act and the existing Ministerial Order¹ and its relevance at its March 2008 meeting. Grape growers and winemakers are generally in favour of the existing Ministerial Order/Wine Grapes Industry Act. They say the grower payment schedule strikes a good balance between the needs of growers to receive part-payment for grapes on delivery, so they can pay costs incurred in picking and delivering the grapes, and the needs of wineries which may not be financially capable of making full payment for grapes on delivery.

The schedule was instigated at the request of industry (both grower and winemaker representative associations) and is raised every year for discussion at the South Australian Wine Industry Association (SAWIA) supply/demand meeting. In 2006 the order's continuation received the general approval of wineries and growers.

The review team noted that the introduction of a voluntary winery/grower code of conduct to deal with the issue of the timing of grower payments is a matter for the industry.

Wine Grape Growers Australia (WGGA) and the Winemakers' Federation of Australia (WFA) have developed an Australian Wine Industry Code of Conduct to guide commercial dealings between grape growers and wineries/processors. That code is voluntary.

At the same time, SAWIC, an advisory body to the State Government, has asked the State's grape and wine industries to review the Wine Grapes Industry Act Ministerial Order and to report back to SAWIC by September 2008. As a result of that review, it may be recommended that the order be revoked, given it is now subject to the voluntary code.

¹ Section 6 of the *Wine Grapes Industry Act 1991* allows the Minister, by order, to fix terms and conditions relating to the time within which payment for wine grapes must be made by processors. The existing Ministerial Order was made in 2004.

6.10 Occupational Health Safety and Welfare (OHS&W)

Issues:

- The State Government does not appear to demand that training providers (for level 3) offer training in regional areas
- Keeping all the records required is a problem.

Discussion:

General concerns were expressed about the compliance burden relating to OHS&W. A specific concern was raised regarding training obligations in regional areas. While safety representatives are required to train at level 3, it is very difficult to comply with this requirement in the regions. The State Government does not appear to demand that training providers (licensees) provide training in regional areas.

Secondly, businesses have expressed their concern that keeping all the records required is a problem.

Government Response:

The South Australian Government has agreed to the following:

- The Business Efficiency Committee under the SafeWork SA Advisory Committee, identify measures to reduce the compliance burden associated with record keeping and training for OH&S
- SafeWork SA have reported OH&S red tape reductions via its agency red tape reduction plan in June 2008.

6.11 Training Contracts

Issues:

- The training contracts system is unnecessarily bureaucratic
- There is a need to streamline the application process of a government funded training program

Discussion:

Concerns were raised about the level of bureaucracy associated with the administration of training programs and government grants. It was asserted that the system has been unnecessarily bureaucratic since its introduction and that, for the amount of money involved – \$15,000 to \$20,000 – the bureaucratic processes, including an audit, are excessive.

The introduction of an electronic interface between the Commonwealth and South Australian traineeship and apprenticeship systems in 2004 resulted in a significant improvement in efficiency and turnaround times for training contract approvals.

DFEEST has begun scoping a new, web-enabled system called Phoenix that will provide potential trainees, apprentices and employers, and other participants in the system (including group training organisations, registered training organisations and Australian Apprenticeships Centres) with tailored information about traineeships and apprenticeships, as well as streamlined electronic transaction and communication facilities. This will reduce red tape for all participants in the traineeship/apprenticeship area.

Government Response:

The South Australian Government has agreed to the following:

- DFEEST to continue development of an e-business management and reporting system (Phoenix) that will improve the timeliness and transparency of decisions and provide a more streamlined and efficient service.

6.12 Signage**Issue:**

- It takes too long to get approvals for signage in a wine region

Discussion:

Concern was expressed about the processes involved in gaining approval for signage related to winery/tourism activities. One winemaker said, 'It took eight

months to gain approval to install cellar door signs on a main road and eight years for the Adelaide Hills Wine Region to get signs on the South-Eastern Freeway. As the Adelaide Hills can be difficult to navigate, signs are important.'

A second winemaker said, 'We are not allowed to put up a warning sign on a side road (e.g. take care while turning) where traffic enters the main road. There is a need for a slip lane on the main road. Trees on the main road are obscuring the view of traffic turning onto the main road and the winery owner is not allowed to remove them.'

Longstanding directional signage issues in the Adelaide Hills were resolved in 2005/06 through a sign installation project managed by the Adelaide Hills Council with funding from the South Australian Tourism Commission (SATC) and involvement of the Department for Transport, Energy and Infrastructure (DTEI) and the local wine industry group.

To ensure a clear process exists and is utilised for tourism signage, the industry can now access application eligibility criteria and road sign guidelines using the 2006 Road Sign Guidelines for Visitor and Services Road Signs, jointly developed by DTEI and SATC, with input from the wine industry and tourism sector. This helps cut red tape by giving tourism business operators transparent knowledge of the application process, eligibility criteria and appropriate signs before they apply.

The review established that:

- The guidelines can be accessed by members of the wine grape growing and wine manufacturing industry at:
<http://www.tourism.sa.gov.au/industryinfo/default.asp>
- The draft guidelines were promoted at presentations to:
 - Premier's Wine Council 2005
 - Wine & Brandy Association
 - Local Government Association

- The guidelines were released in late 2005 to the following organisations:
 - South Australian Wine Industry Association
 - Local Government Association
 - Transport Services Division Regions
- As the information is readily available, the industry simply needs to be told where to find it. This could be undertaken by DTED or PIRSA.

6.13 WorkCover

Issue:

- WorkCover needs to be less employee-focused.

Discussion:

Concerns were expressed about the operation of the WorkCover system.

It was asserted that WorkCover needs to be less employee-focused and that there should be greater emphasis on employees' obligations. The review was told that because of the costs involved in employing permanent staff, employers choose to use contractors as it is a simple matter to pay an invoice when it is submitted.

6.13.1 Review of WorkCover

The Industrial Relations Minister, the Hon. Michael Wright, announced a review of the South Australian Workers Rehabilitation and Compensation Scheme on 29 March 2007. The legislative review considered changes to improve the scheme's underlying performance and improve the return to work process for injured workers, to ensure the scheme is cost-competitive for business. Some areas of complexity identified by businesses during industry reviews were considered as part of the WorkCover review.

The review was completed by 30 November 2007, and the new legislation has been operational since 1 July 2008.

6.14 Payroll Tax – Rebates

Issue:

- Trainee and export payroll tax rebates are processed six-monthly. A more efficient method would be a deduction from the monthly return

Discussion:

Concern was expressed about the administrative work involved in claiming a payroll tax rebate. Some businesses have proposed that a more efficient method would be a deduction from the monthly return.

Revenue SA, a Division of the Department of Treasury and Finance (DTF), has agreed to simplify this process by implementing an online system for completion and lodgement of Payroll Tax Trainee Rebate applications and trainee details. At the same time, there will be a complete revision of the statutory declaration requirements associated with applying for the rebate. As a first step, Revenue SA has agreed to omit the current requirement for a Justice of the Peace Declaration. This initiative has already been implemented.

Furthermore, DTF has undertaken a review of legislation and regulations applying to stamp duty, land tax, payroll tax and other State taxes to identify and remove redundant provisions and regulations, and therefore unnecessary regulatory burdens on business.

Government Response:

The South Australian Government has agreed to the following:

- A review of legislation and regulations applying to payroll tax, stamp duty, land tax and other State taxes to identify and remove redundant provisions and regulations. This has been completed.
- A Bill seeking amendments to remove redundant provisions from various State revenue legislation (the *Statutes Amendment and Repeal (Taxation Administration) Bill 2008*) has been introduced to Parliament.

6.15 Export Assistance

Issue:

- Small exporters need more assistance

Discussion:

Some small and medium sized businesses (SMEs) expressed a desire for the State Government to increase their support for SMEs considering exporting.

The Government supports South Australian wine exporters through its Market Access Program (MAP). For the 2006/07 financial year, total MAP grants to the wine industry amounted to \$128,000 and for 2007/08 it is expected that the level of support will be similar. TradeStart is a partnership between Austrade and DTED to provide services to help SMEs to develop their business overseas.

The State Government funds overseas-based trade offices in India, Hong Kong, Singapore, London, China and the Middle East to assist South Australian businesses to export their products to overseas markets. They provide the local expertise.

In addition, the Government provides extensive opportunities and support through trade mission programs to target markets with specific industries. These missions are undertaken following extensive involvement of business in South Australia.

Government Response:

The South Australian Government has agreed to the following:

- DTED has undertaken a comprehensive review of MAP and in response to the recommendations from this review changes have been made to improve and simplify the application process and to generally make it easier for businesses to apply for funding.
- There are a number of trade missions planned throughout the year and some of them are specifically for the State's wine sector.

6.16 Inconsistencies between Jurisdictions

Issue:

- Inconsistent legislation in a range of areas increases the overall regulatory burden.

Discussion:

Concern was expressed that businesses which operate in more than one jurisdiction are confronted by different regimes for common issues.

COAG has established a working party on the topic of business regulation and competition to:

- Accelerate and broaden the regulation reduction agenda to reduce the burden on business
- Accelerate and deliver the agreed COAG regulatory hot spots agenda
- Further improve processes for regulation making and review, including exploring a national approach to processes to ensure there is no net increase in the regulatory burden, and provide common start dates for legislation
- Deliver significant improvements in Australia's productivity and international competitiveness.

Government Response:

The South Australian Government has committed to:

- Active participation in the COAG Business Regulation and Competition Working Party.

6.17 Cellar Door Rebate and BAS

Issue:

- The cellar door rebate should be aligned with the Business Activity Statement (BAS) system.

Discussion:

Currently the cellar door rebate is claimed separately from the State Government. One business argued that the funds for this subsidy are provided by the Federal Government, so the subsidy should be part of the periodic BAS payment and reporting process.

The federal rebate operates under Commonwealth Wine Equalisation Tax (WET) legislation and a claimant is required to satisfy manufacturing parameters. The South Australian subsidy operates under guidelines² where a wine and brandy producer must hold a producer's licence or special circumstances licence with a condition authorising the sale of wine and brandy produced by the licensee in accordance with section 39 of the Liquor Licensing Act 1997.

It would not be possible to align the South Australian subsidy with the BAS regime for a variety of reasons, including that the South Australian subsidy:

- Is based on 15% of cellar door sales and not 29% of domestic sales (as under the Commonwealth system).
- Recognises individual licensees, whereas the Commonwealth system recognises consolidated entities.
- Recognises wine and brandy cellar door sales, whereas the Commonwealth recognises only wine sales.

The South Australian cellar door rebate (subsidy) and Business Activity Statement (BAS) regime are quite different arrangements administered by separate jurisdictions; they are based on different criteria requiring different calculations.

There is considerable flexibility in the administrative arrangements of each. Wineries can claim the cellar door rebate (subsidy) monthly, quarterly or annually. Similarly BAS can be submitted monthly, quarterly or annually by arrangement with the Australian Tax Office (ATO).

² The guidelines can be found on the OLGC website.

It is up to businesses to coordinate processing of their various claims and obligations.

6.18 Workforce vacancies

Issue:

- Shortage of skilled workers in the wine region.

Discussion:

A shortage of skilled workers in the State's wine regions was raised as an industry concern. One way to address this issue is through the State-sponsored skilled migration program.

Government Response:

DTED has completed an evaluation of its sponsorship processes to identify process improvements. The aim is reduce average processing time from 3.8 weeks to 3 weeks.

ATTACHMENT 1: SELECTION OF REGULATIONS AND ACTS

1 Introduction

A selection of South Australian Regulations/Acts that businesses within the wine manufacturing and grape growing industries need to comply with and the licences they need to obtain to operate a business within the industry. For further information, businesses are advised to go to: <http://sa.bli.net.au/>

2 Liquor

Act	Licence	Managing Agency
<i>Liquor Licensing Act 1997</i>	Obtain and comply with the conditions of a producer's licence.	Liquor Commission

3 Development Approvals

Act	Requirement	Managing Agency
<i>Development Act</i>	<i>Approval is required for development, land division, change of land use, erection of a building or structure other than prescribed activities.</i>	Planning SA, local councils.

4 Environmental

Act	Licence / Requirement	Managing Agency
<i>Environment Protection Act 1993</i>	<ul style="list-style-type: none"> • Licence required for a prescribed activity of environmental significance. • Works approval required for alteration or erection of any building or equipment for use for a prescribed activity of environmental significance. Approval not required where approval is required under the Development Act. • Not to cause or permit air pollution with taking all reasonable practical measures. • Not to undertake actions that pollute the environment without taking all practicable measures to prevent or minimise environmental harm. 	Department for Environment and Heritage, Environment Protection Authority
<i>Natural Resources Management Act</i>	<ul style="list-style-type: none"> • Payment of a levy. 	Department for Environment and Heritage, Environment Protection Authority

5 Irrigation and Water

Act	Requirement	Managing Agency
<i>Natural Resources Management Act</i>	<ul style="list-style-type: none"> Requires NRM Boards to prepare water plans for each prescribed region. Provides for the Minister to grant licences for taking water from a prescribed watercourse etc. 	Department of Water, Land and Biodiversity Conservation (DWBLC), Environment Protection Authority
<i>Sewerage Act 1929</i>	Notice, order or demand for payment of sewerage rates.	SA Water Corporation
<i>Water Resources Act 1997 s. 14</i>	To maintain a watercourse or lake in good condition.	SA Water Corporation, Department of Water, Land and Biodiversity Conservation (DWLBC)
<i>Irrigation Act 1994</i>	Establishes irrigation districts and trusts. Specifies the amount of allocated water.	SA Water Corporation, DWLBC
<i>River Murray Act 2003</i>	Provides clear powers over the way in which the river is used and to control planning, irrigation practices, pollution and rehabilitation programs.	DWLBC
<i>Upper SE Dryland Salinity and Flood Management Act 2002</i>	Provides for a scheme to protect and improve the environment and agricultural protection in the Upper South-East through the proper conservation and management of water and the implementation by the Government of works etc.	DWLBC

6 Heritage

Act	Requirement	Managing Agency
<i>Aboriginal Heritage Act 1988</i>	Compliance with heritage agreements. Compliance with restrictions on activities placed on a site or surrounding a site.	Department for Environment and Heritage

7 Native Vegetation

Act	Requirement	Managing Agency
<i>Native Vegetation Act 1991</i>	Compliance with clearing native vegetation.	Natural Resource Management Boards, DWLBC

8 Roads

Act	Requirement	Managing Agency
<i>Highways Act 1926</i>	Compliance with conditions of access from any road abutting a winery.	Department for Transport Energy & Infrastructure

9 Food and Sanitation

Act	Requirement	Managing Agency
<i>Public and Environmental Health Act 1987</i>	Directions under the Food Act prohibiting the use of unclean or unsanitary premises for the storage or handling of food. Local government health officers monitor public health compliance.	Department of Health, Local Government
<i>Food Act SA 2001</i> <i>Food Act Regulations 2002</i>	Directions under the Food Act prohibiting the use of unclean or unsanitary premises for the storage or handling of food. Labelling, processing aids, residues, wine production standards, wine processing requirements.	Office of Consumer and Business Affairs (OCBA), Department of Health
<i>Primary Produce (Food Safety Schemes) Act 2004</i>	Does not directly relate to wine but provides for food safety matters relating to the production of primary produce.	Department of Primary Industry and Resources SA (PIRSA)

10 Trade Measurement

Act	Requirement	Managing Agency
<i>Trade Measurement Act (SA) 1993</i>	Establishes minimum packaging and trade measurement requirements. Applies the Australian Food Standards to wine.	OCBA
<i>Trade Measurement (Pre-Packaged Articles) Regulations SA 1993</i>	Imposes country of origin statements, identification requirements, declaration of ingredients on the manufacture of wine, date marking, volume of alcohol statement.	OCBA

11 Biosecurity

Act	Requirement	Managing Agency
<i>Natural Resource Management Act</i>	Comply with directions relating to the destruction and control of animals and plants. Comply with directions relating to the transportation or movement of any animal, plant, soil or other thing.	DWLBC

<i>Phylloxera and Grape Industry Act 1995</i>	Grape growers (> 5ha) to register with PGIBSA, prepare returns on transfer of vineyard holdings / a vineyard. Pay a contribution to the Board. In the event of an outbreak, comply with action taken by PIRSA.	Phylloxera and Grape Industry Board of South Australia (PGIBSA)
<i>Fruit and Plant Protection Act 1992</i>	Report the existence or suspected existence of disease in fruit or plants. Comply with import requirements under the Plant Quarantine Standards SA.	PIRSA

12 Chemicals and Industrial Waste

Act	Requirement	Managing Agency
<i>Agricultural and Veterinary Chemicals (Control of Use) Act 2002</i>	Controls the use and storage of agricultural chemicals. The Regulations define label directions that must be followed, restrictions on certain chemicals and standards for fertilisers.	PIRSA

13 Workers Compensation

Act	Requirement	Managing Agency
<i>Workers Rehabilitation and Compensation Act 1986</i>	Determination of liability in relation to injured workers.	SafeWork SA

14 SA Levies

Act	Requirement	Managing Agency
<ul style="list-style-type: none"> • <i>Primary Industry Funding Schemes Act 1998</i> • <i>Primary Industry Funding Schemes (Adelaide Hills Wine Industry Fund) Regulations</i> • <i>Primary Industry Funding Schemes (Riverland Wine Industry Fund) Regulations</i> • <i>Primary Industry Funding Schemes (McLaren Vale Wine Industry Fund) Regulations</i> • <i>Primary Industry Funding Schemes (Langhorne Creek Wine Industry Fund) Regulations</i> 	<p>Winemakers / grapegrowers contribute to a fund for the benefit of contributors.</p> <p>Winemakers are required to collect and remit contributions to PIRSA. Winemakers are required to submit a financial statement to PIRSA of the contributions they have collected.</p>	PIRSA

ATTACHMENT 2: LOCAL GOVERNMENT ISSUES

Planning Approvals and Processes

Numerous issues were raised in relation to this area.

Processes are slow and cumbersome. For example, removing a dead tree (which was an OHS hazard) required filling in a form and drawing a map.

Development applications involve review by several groups – processes should be coordinated and streamlined. For example, the EPA had approved an application for a cellar door facility but the local government development assessment panel did not approve it, allegedly because of a policy decision that there should be no more cellar doors in the Mt Lofty Ranges water catchment area. Eventually, after \$20,000 was spent on a consultant's services, approval was given for an administration and visitors' centre exactly the same as the proposed cellar door. Only the name is different. Identical plans were submitted. As the result of this experience, the owner will not proceed with plans for a restaurant or a winery, costing approximately \$1 million, because the process would be 'too hard'.

In another case, an application for three units (on the site of an existing dwelling) to provide tourist accommodation was rejected. 'An 82-acre site was treated the same as a town lot.' In order to obtain approval, the applicant has submitted revised plans incorporating two units under the same roof.

Another application for a cellar door took 10 months to approve and it is expected that the processes involved in building new/expanded facilities will take a further 18 months.

A third applicant for cellar door approval was advised that only trucks of up to 3.5 tonnes would be allowed to enter the property (a working farm which already has very large trucks entering and leaving).

Other complaints included:

We have to hire a planning consultant to do the application for us. There is no customer service in council.

Council required three toilets – male, female and disabled.

Council said that the cellar door could store up to 10 boxes of wine (which is ridiculous) – if there are more than 10 boxes of wine it becomes a storage facility.

Council said the cellar door could serve only platters (but not other food).

Council staff would advise regarding non-compliance but did not go out of their way to help in achieving compliance.

Council staff encouraged an applicant to pursue development proposals in little bits rather than as a whole.

Council did not enforce compliance with approved signage (heritage style and colours).

It was necessary to hire someone to help me to comply with council requirements because of complexity and lack of help from council. It appears that council manages risk by not giving advice/help, thereby forcing applicants to use professionals.

The roles of EPA, council and private building assessors are not clear (for example, in relation to disposal of waste water from a winery). Another grower said it was difficult to get planning approval to construct a permanent river crossing.

Government Response:

Review of the SA planning system

On 19 June 2007 the State Government announced the State Planning and Development Review. The review was directed by a small, independent Steering committee, reporting to the Minister for Urban Development and Planning, the Hon. Paul Holloway MLC.

Michael O'Brien MP, Parliamentary Secretary to the Premier, is chair of the steering committee, which includes members from the Economic Development Board, two representatives from local government and a planning law expert.

The main objectives of the review and the resulting reforms are to:

- Establish SA as the most competitive place in Australasia in which to do business
- Improve the performance, timeliness, certainty and accountability of the planning system – in both State and local government arenas
- Review the role and responsibilities of Planning SA and local government within the overall planning system.

Issues that were raised during the consultation process with business owners and representatives and in submissions by the industry associations were passed on to the steering committee and considered as part of the Review. The Review was released in June 2008.

ATTACHMENT 3: REVIEW QUESTIONS

Review of Wine Grape Growing and Wine Manufacturing Industry

The State Government set up the Competitiveness Council to propose initiatives to improve South Australia's national and international competitiveness, and to lead efforts to achieve the Government's goal of reducing red tape by 25% or \$150 million by July 2008.

The Council is implementing a series of industry reviews to consult with industry in identifying practical initiatives for red tape reduction. This includes a review of wine grape growing and wine manufacturing.

The Competitiveness Council Secretariat is keen to talk with a number of industry associations and businesses in a search for red tape reduction ideas. The discussions are confidential and no individual business details will be divulged in future reports.

These are some of the questions that the Competitiveness Council Secretariat would like to ask:

1. Which regulations and licences cause your business the biggest problem?
In particular,
 - a) Which regulations are most difficult to comply with?
 - b) Which regulations are most costly to comply with? This could mean financial costs as well as the time and effort it takes to comply with regulations, like record keeping and reporting.
2. Which regulations/licences could be removed or reduced because they are unnecessary, overlapping, repetitive or inconsistent?
3. What would you like the State Government to do to reduce red tape for your business?
4. How hard is it to find information to set up or expand a business?
5. For those businesses which operate nationally, how does South Australia's regulatory burden compare with other States and Territories?