

RIS Ref: DAF152-1015 File Ref: DOC16/3479

28 September 2016

Ms Margot Ricardo
Principal Policy Officer
Biosecurity Queensland
Department of Agriculture and Fisheries
GPO Box 46
BRISBANE QLD 4001

Dear Ms Ricardo

Decision Regulatory Impact Statement - Review of Regulatory Fees for Veterinary Surgeons

Thank you for your enquiry of 7 September 2016, and further information provided on 20 and 22 September 2016, seeking advice on the adequacy of the 'Review of Regulatory Fees for Veterinary Surgeons' Decision Regulatory Impact Statement (RIS).

Consultation RIS

The Consultation RIS released on 4 August 2016 by the Department of Agriculture and Fisheries (the Department), provided stakeholders with a proposal to increase the regulatory fees prescribed in the *Veterinary Services Regulation 2002*.

Three options for increasing regulatory fees were presented.

- 1. Maintain the status quo (fees increase by 3.5 per cent, or CPI), with no change in fee structure
- 2. A uniform 35 per cent fee increase, with no change in fee structure
- 3. An average fee increase of 55 per cent, with changes to the fee structure for specialist veterinarians, retired veterinarians and new graduates.

The Department's preferred option in its Consultation RIS was option three as it was designed to: achieve cost recovery objectives; enable improved service delivery by the Veterinary Surgeons Board and provide a more equitable distribution of fee burden across registrants.

Decision RIS

A Decision RIS builds on a Consultation RIS by incorporating issues raised in submissions, including how those views were taken into consideration by the Department in developing its final recommendations.

Submissions on the Consultation RIS closed on 1 September 2016. The Department advises it received ten written submissions, in addition to 347 online surveys responses.

The Decision RIS includes an amended option with a 45 per cent (on average) increase in fees, compared to 2015–16. The Department proposed the amended, and recommended option, to account

for both stakeholder comments on the size of the increase in fees, as well as higher than expected veterinary registrations in the 2015–16 financial year.

The amended option has a lower average fee increase than option 3 (recommended option in the Consultation RIS), but maintains a revised fee structure for specialist veterinarians, retired veterinarians and new graduates. Based on stakeholder feedback, the amended option also removes the registration fee exemption currently provided to government veterinarians, which was to be maintained under the preferred option presented in the Consultation RIS.

In assessing the Decision RIS, the Queensland Productivity Commission considers that the Department has summarised the key issues raised in submissions from stakeholders on the Consultation RIS and addressed relevant matters where appropriate. The Commission therefore considers the Decision RIS is adequate to support the decision maker's consideration of the regulatory proposal.

Please contact Sean Mackay, Principal Analyst on (07) 3015 5149 if you require any additional information or guidance in relation to the above comments or the Queensland Government Guide to Better Regulation.

Yours sincerely

Kristy Bogaards

Acting Executive Director

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