

standards management

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To: standards management
Subject: FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]



FSANZ: Applications and Submissions - Submission

Friday, 27 September, 2013

- 1. Assessment Report Number:** P1025
- 2. Assessment Report Title:** Proposal P1025 - Code Revision
- 3. Organisation Name:** Department of Health & Human Services Tasmania
- 4. Organisation Type:** Government Agency
- 5. Representing:** Environmental Health Unit
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12. Submission Text: The Department is concerned that the Code Revision process is not meeting the initial objectives and in particular, many of the proposed changes may well have an adverse impact on the workability of the Code. The Department also believes that the proposed changes are significant in scope and will impact adversely on businesses (who use the Code in QA and other systems) and should therefore be subject to a detailed cost benefit analysis. This Department does not have resources to provide a detailed analysis of each of the proposed changes, but makes the following general observations:-

1. The aim to improve the clarity and readability goal has not been achieved. Arguably the introduction of new concepts and the re-wording of existing terms and the use of legal technical language and more complex formatting will make the Code less usable as a working document to both regulators, the community and industry alike.
2. It is recommended that the initial collaborative approach to progressing the Code Review should be reinstated. This will assist the process by ensuring jurisdictions for example, who interpret and enforce the Code can guide and ensure the adequacy of policy and technical intent and outcomes. It is further suggested that issues such as drafting style, priority of task areas and scope should be agreed to collaboratively and then applied rigorously to the process. In summary, the department is concerned that the proposed changes do not meet the review aims and further, that proposed changes adversely affect the use of the Code as a working document. It is therefore recommended that the review team re-visits the aims, establishes strong ground rules around scope and issues such as drafting styles and re-establishes a collaborate approach to better guide the review process.