

8 March 2011

Hon T Koutsantonis  
Minister for Small Business  
GPO Box 464  
ADELAIDE SA 5001

Dear Minister Koutsantonis

**Re: *Draft Small Business Commissioner Bill - 2011***

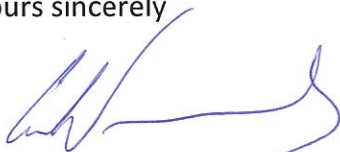
Thank you for meeting with me on Tuesday 22<sup>nd</sup> February 2011.

As discussed with you at that meeting with Mr Tony Piccolo MP, Member for Light and Parliamentary Secretary to the Premier, I am writing to request that another clause be inserted into the *Draft Small Business Commissioner Bill – 2011* that allows the Commissioner to develop Industry Codes.

The South Australian Farmers' Federation (SAFF) believes this is an important inclusion that would empower industry to self-regulate and thus assist the office of the Small Business Commissioner and potentially reduce costs for the Unit and government.

The SAFF applauds the government initiative in developing the office of the Small Business Commissioner and will endeavour to continue to work collaboratively with government and values the support and assistance received from Tony Piccolo

Yours sincerely



Carol Vincent  
**CHIEF EXECUTIVE**



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10 March 2011

Hon T Koutsantonis  
Minister for Small Business  
GPO Box 464  
ADELAIDE SA 5001

Dear Minister Koutsantonis

**Re: Draft Small Business Commissioner Bill - 2011**

I would like to add more detail to the request made in my letter of 8 March 2011 regarding the Draft Small Business Commissioner Bill – 2011.

While I think the legislation would be welcome by the small business sector some minor amendments to the draft Bill would enable the farming sector to better utilise the proposed dispute resolution mechanisms; and more importantly give the industry a greater role in resolving disputes without burdening the public purse.

Following our discussion I had the opportunity to discuss the matter with your advisor Associate Professor Frank Zumbo. I have also read the recommendations made by the Economics and Finance Committee of State Parliament in its farm machinery inquiry.

In the South Australian Farmers' Federation's (SAFF) view the legislation could be improved by creating a head power in the proposed Act that would enable the Governor to create industry specific codes of practice through regulation.

This would require a minor amendment to the current draft Bill as Federal industry Codes of Practice are already incorporated.

By giving the Governor (in effect the Minister) the power to introduce industry specific Codes of Practice it would enable the Government to respond to new issues in specific industry, but also shift more responsibility to industries to better regulate their own practices.

In regards to the agriculture industry, a code of practice for farm machinery (to be negotiated later with industry) would enable SAFF to play a bigger role in resolving disputes and act as a clearinghouse before unresolved disputes are escalated to the Small Business Commissioner.

Such an approach would be of benefit to both the farm sector and government.

Once the Bill is enacted SAFF would be happy to meet with you to discuss the framework of a possible code of practice and how it could work with you to gain industry support for such a code.

We look forward to working with you. Do not hesitate to contact me if you require any clarification.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Carol Vincent', with a long, sweeping underline that extends to the right.

**Carol Vincent**  
**CHIEF EXECUTIVE**