



AUSTRALIAN CHAMBER OF  
COMMERCE AND INDUSTRY

22 April 2015

Committee Secretary  
Senate Education and Employment Committees  
PO Box 6100  
Parliament House  
Canberra ACT 2600E-mail: [eec.sen@aph.gov.au](mailto:eec.sen@aph.gov.au)

LEVEL 3  
486 ALBERT STREET  
EAST MELBOURNE 3002  
PO BOX 18008  
COLLINS STREET EAST  
MELBOURNE VIC 8003  
ABN 85 008 391 795  
PH: 61-3-9668 9950  
FAX: 61-3-9668 9958  
WEB: [www.acci.asn.au](http://www.acci.asn.au)

Dear Sir/Madam,

**Safety, Rehabilitation and Compensation Amendments (Improving the Comcare Scheme) Bill 2015**

The Australian Chamber of Commerce and Industry (ACCI) is the peak council of Australian business associations. ACCI represents over 300,000 businesses in every state and territory and across all industries. Our network employs around 4 million employees, ranging from the top 100 companies to small and medium businesses.

ACCI welcomes the opportunity to provide feedback on Safety, Rehabilitation and Compensation Amendments (Improving the Comcare Scheme) Bill 2015 (the Bill).

ACCI supports the applications and submissions that are provided by ACCI members. This feedback is provided without prejudice to ACCI or its members' views.

ACCI supported the Safety, Rehabilitation and Compensation Legislation Amendment Bill 2014. ACCI believes the 2014 bill gives businesses an opportunity to make a commercial decision to participate in the Commonwealth scheme, allowing them to weigh up the costs and the benefits. The 2014 Bill does not provide a solution for all multi-state employers as the costs of self-insurance may outweigh the benefits. Businesses should be allowed to make this decision themselves.

It should be noted that the vast majority of businesses in Australia operate within a single jurisdiction, so it is expected that they would not be directly impacted under current proposals.

ACCI supports the emphasis on early engagement of workers and employers and emphasis on early safe return- to- work (RTW). Of course legislation itself will not lead to successful RTW. Education and awareness programmes are fundamental in encouraging a positive RTW culture.

Further, ACCI supports steps to ensure that any compensable injuries will require a stronger link to employment; that secondary psychological injuries will be excluded from some compensation; that there should be more understanding of acceptable reasonable action and ensuring medical treatment is evidence-based.



ACCI notes that similar systems as proposed in the Bill for capping medical and legal costs have proven effective in other jurisdictions without reducing standards.

ACCI would be pleased to discuss the proposed Bill further or provide more detailed information.

Yours Sincerely,

**CAROLYN DAVIS**

Manager Work Health, Safety and Worker's Compensation Policy  
AUSTRALIAN CHAMBER OF COMMERCE AND INDUSTRY