

12 December 2008

The Better Regulations Office
GPO Box 5341
SYDNEY NSW 2001

tradelicences@dpc.nsw.gov.au

Dear Sir/Madam,

Submission RE: Licensing of Selected Occupations

I am writing this submission on behalf of the Australian Wool Exchange Limited in response to the Issues Paper regarding the above matter but specifically in relation to the licensing of Wool, hide and skin dealers within this program.

Background

The Australian Wool Exchange Limited (AWEX) is a not-for-profit industry organisation. The Members of AWEX are commercial entities consisting of wool brokers, exporters, processors, private treaty merchants and wool growers.

The wool industry is a deregulated industry and as such manages its own affairs and our commercial members trade nationally and internationally. The role of an organisation such as AWEX is to monitor, inform and facilitate fair and efficient trade in Australia. AWEX also provides a number of quality and compliance services to ensure the integrity of the Australian wool clip. AWEX also operates a number of registration schemes supported by standards and compliance programs.

Views

In relation to the views sought through submissions I offer the following:

- **Licensing Benefits:** AWEX supports that there is benefit in licensing with respect to the professional standards of the industry however given that the other states within Australia have stopped offering this program one could argue that there is little benefit in this service.

Similar to the wool industry, a well informed and transparent industry from consumer through to dealer in a system where commercial forces operate freely should be the aim. Professional standards are important but it is my understanding that there are other systems in place (legal, trade practices etc) to address any issues.

- **Costs:** I am not fully aware of the costs of operating the current system and therefore I have no comment.
- **Alternatives:** There are a number of ways to address the communication of any issues to those in this industry. AWEX receives enquiries from the Police seeking assistance in relation to

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distributing information with respect to lost, stolen goods and other criminal activity. This is a very effective means of delivery as our data base and the database of other active organisations is current and has a broad network of members across the country let alone the state.

Organisations, such as AWEX, provide this service free of charge, as we believe in the integrity of our industry and are looking to ensure that organisations and people involved in this type of activity are dealt with in the appropriate manner.

It is not compulsory to be a member of AWEX or any other organisation and this is one benefit that registration provides and that is a current contact and distribution list. My personal recommendation would be to maintain registration only. The protection of consumers is important but equally if a business is less than scrupulous the current system offers no further protection. The process of taking action is the same regardless of the licensing requirements.

- NSW: I do not see any reason why NSW licensing arrangements should continue as they do not exist elsewhere. I would reiterate that contact and distribution lists are important and comparison of your current lists with our own would be an interesting exercise and provide an avenue to trial other methods.

I trust this submission is of some assistance and if you require any further clarification please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mark Grave', written over a white background.

Mark Grave

Chief Executive Officer