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14 February 2019

Mr Neil Savery  
General Manager,  
Australian Building Codes Board  
Dear Neil,

**Public access to the submissions to the Regulatory Impact Assessment for  
mandate accessibility in new housing construction**

Thank you for your prompt response to our letter of 18 December 2018 with our feedback on the consultation process for the Accessible Housing Options Paper.

We understand your reticence to publish the responses to the Options Paper, given that submissions were taken on the understanding they would not be published, so as to enable stakeholders to be frank in articulating their views. **We ask that you make submissions to the next stage of the Accessible Housing Project, the Regulatory Impact Assessment, available to the public.** There are two reasons for our request:

1. It is common practice for submissions on an issue of this magnitude to be made public. It allows participants to understand the wide range of views and interests involved in the consultation. If participants do not wish to have their submission to be made public, they can indicate this in their submission.
2. The lengthy and difficult advocacy by consumer organisations, such as ours, to get this RIA in the first place has resulted, rightly or wrongly, in mistrust in government processes and an expectation of political interference by self-interested stakeholders. While political interference is beyond your control, it is in the interests of the ABCB that their the decision-making processes not only are transparent, but also *are seen* to be transparent.

We acknowledge the genuine intent of the ABCB and the open and respectful communication between us. We are as intent as you are to ensure the RIA meets the principles of best practice regulation; in particular, “adopting the option that generates the greatest net benefit for the community”<sup>1</sup>.

We look forward to your prompt response by email to [anuhd@anuhd.org](mailto:anuhd@anuhd.org). Thank you.

Yours Sincerely,

**Margaret Ward PSM/David Brant**  
Convenors  
Australian Network for Universal Housing Design  
[www.anuhd.org](http://www.anuhd.org)

Cc Kieran O’Donnell, Senior Project Officer, Australian Building Codes Board.

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<sup>1</sup> COAG. (2007). *Best practice regulation: A guide for ministerial councils and national standard setting bodies*. Canberra: Australian Government Department of Prime Minister and Cabinet.