



Mr Jason Lange
Executive Director
Office of Best Practice Regulation
Department of the Prime Minister and Cabinet
1 National Circuit BARTON ACT 2600

Email: helpdesk-OBPR@pmc.gov.au

Dear Mr Lange

**Regulation Impact Statement – Issuing Body Reform for the
Aviation and Maritime Security Identification Card (ASIC and MSIC) Schemes –
Second Pass Final Assessment**

I am writing in relation to the attached Regulation Impact Statement (RIS) prepared for the issuing body reform for the ASIC and MSIC schemes (OBPR ref. 24186).

I am satisfied that the RIS addresses the comments in your letter of 3 August 2021. Specifically, your comments have been addressed in the RIS by:

- Explaining the status of the RIS at each of the major decision points of the policy development process, outlined in Table 1 in the 'Purpose' section of the RIS,
- Clarifying that improved enforcement by the regulator under the status quo option is unlikely to be effective and will not address the systemic vulnerabilities in the devolved issuing body model (see pages 8 and 11),
- Specifying how compliance concerns and/or security risks associated with third party providers under the preferred option will be mitigated (see page 17),
- Describing the outcomes of industry consultation (see pages 19 to 21), and
- Summarising why Option three is likely to deliver the highest net benefit (see Section 10 at page 21).

The RIS contains an appropriate consultation plan and quantifies the changes in regulatory burden on business, community organisations and/or individuals using the Regulatory Burden Measurement framework.

Accordingly, I am satisfied that the RIS is now consistent with the six principles for Australian Government policy makers as specified in the *Australian Government Guide to Regulatory Impact Analysis*.

I submit the RIS to the Office of Best Practice Regulation for formal final assessment.

Yours sincerely,

Cath Patterson
Deputy Secretary
Strategy and Law Enforcement Group
Department of Home Affairs

August 2021