

Dear Dr Liddell

I read your discussion paper and have some questions;

The distribution of charges levied vs value of chemicals introduced is shown for 2008-9 in your table 4.

- Do you have historical data for this distribution?

Prior to the 2004-5 introduction of registration fees to low value importers the LRCC Task Force noted that mandatory registration can increase the regulatory burden on small businesses – but expressed the view that the benefits will outweigh the costs in the longer term.

- What are these benefits – as they specifically apply to micro and small businesses?

Your discussion document lists some questions e.g.

1. What services do tier 1 registrants require from NICNAS?
  - The question might better be phrased; What services do tier 1 registrants receive from NICNAS and what are the quantifiable long term benefits alluded to by the LRCC Task Force in their justification of mandatory registration irrespective of business size?

I look forward to your response and also to providing some input on NICNAS fees and charges. As with your previous workshops it is unfortunate that the majority of small businesses do not have their offices in major capital cities and hence attendance at your forthcoming stakeholder workshops are likely to have an attendance skewed towards big business rather than representative of the revenue received by NICNAS as a % of mandatory registration fees.

Yours Sincerely

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