

CSL Limited
45 Poplar Road Parkville
Victoria 3052 Australia

T +613 9389 1911
F +613 9389 1434
www.csl.com.au



April 28, 2015

Committee Secretary
Senate Education and Employment Committees
PO Box 6100
Parliament House
Canberra ACT 2600

Submission: via email to eec.sen@aph.gov.au

Re: Safety, Rehabilitation and Compensation (SRC) Amendment (Improving the Comcare Scheme) Bill 2015

Dear Sir, Madam,

CSL Limited (CSL) as a self-insured licensee operating within the Comcare Scheme, actively supports the suite of changes outlined in the *Safety, Rehabilitation and Compensation (SRC) Amendment (Improving the Comcare Scheme) Bill 2015* (the Amendment Bill).

CSL considers that the overall change package is fair, equitable and balanced in the mutual obligations of employees and employers, and provides improved administrative arrangements and efficiency of scheme operations.

Examples of the above include greater balance in benefits payable under the SRC Act, further improvements in rehabilitation effectiveness, set schedules for medical and legal expenses and accreditation registers for scheme providers. The changes also correct several anomalies that have arisen through unexpected case law (*Canute v Comcare*, *Wiegand v Comcare* and *Comcare v Simmonds*) returning provisions of the scheme back into line with the original intent of the SRC Act.

The changes are the most significant proposed since the introduction of the SRC Act in 1988 and in many instances are long overdue. Furthermore whilst some changes are similar to the provisions provided for in State Schemes, the SRC Act would continue, in many areas, to provide the most generous benefits of any scheme in Australia. CSL supports that the Amendment Bill be passed in full.

Sincerely,

Paul Perreault
Chief Executive Officer and Managing Director