Preparing a Tasmanian Government submission to an Inquiry or Review can require significant resources. It may present an important opportunity to influence policies or strategies in areas significant to the State. These principles provide a common framework for departments to consider when assessing whether to prepare a Tasmanian Government submission.

This should be read in conjunction with the associated ‘Process’ document. The two documents are designed to assist departments to work together and apply a consistent approach to Inquiries and Reviews.

Definition and coverage
These principles should be used to assess all Inquiries, Reviews and calls for submissions undertaken by:

- Tasmanian statutory or Parliamentary committees;
- Australian Government departments and statutory bodies, the Commonwealth Parliament, various Commissions or special Inquiries; and
- non-government organisations or international bodies.

Exclusions: Matters related to international treaties entered into by the Australian Government, and Commonwealth-State Agreements – these have their own processes (available at www.dpac.tas.gov.au/divisions/policy/intergovernmental_relations).

Although the principles should always be applied, the associated process will not apply in all cases. See the ‘Process’ document for relevant exemptions.

How to use these principles
The principles must be weighed against each other to assess whether a submission is justified. Sometimes only one principle will be satisfied but it will be significant enough to justify making a submission. In other cases, multiple principles may be satisfied, but to an insufficient degree to justify the diversion of resources to prepare a submission.

Senior departmental officials are expected to use professional judgment in applying these Principles, and to consult central agency officials where there are queries or concerns about the application of the Principles.

Although these guidelines do not formally bind state-owned businesses, such organisations should continue to be mindful of government policy in carrying out their functions and should liaise with relevant departments or Ministers where necessary and appropriate.
Role of central agencies

Line agencies hold policy expertise and have portfolio responsibility for most issues, and are best placed to assess their own priorities and capacity. However, central agencies play an important coordination, monitoring, and advice role in relation to Inquiries and Reviews. Central agencies and line agencies should work together to ensure the appropriate level of consideration and involvement across government.

Principles

WILL PREPARING A SUBMISSION:

- **contribute to Tasmanian Government policy objectives?**

  The Tasmanian Government may be invited to make submissions to Inquiries and Reviews that have little to do with State areas of responsibility or control but have significant implications for Tasmania, for example the McClure Review of Australia’s Welfare System.

  Consider whether making a submission will further Tasmanian Government policy objectives, for example by emphasising Tasmanian policy in a broader context, or arguing for changes that will better align with Tasmanian policy objectives.
  
  - Is it a high priority issue for the Tasmanian Government?
  - Will a submission contribute to Tasmanian Government objectives?
  - Would the Tasmanian Government be considering the issue in the absence of the Inquiry/Review?

- **be of strategic benefit to Tasmania?**

  Sometimes, a submission may not directly contribute to Tasmanian Government policy objectives but may be of strategic benefit. Key stakeholders such as the Australian Government, other states and territories, local government, employer groups, unions, specific interest groups or local or regional communities may expect the Tasmanian Government to make a submission, or a submission may be an important way to position the Tasmanian Government on a particular issue.

  - Is there an expectation or commitment that Tasmania will make a submission?
  - Could the submission be an opportunity to position Tasmania strongly for future discussions or negotiations?
  - Could failure to make a submission or provide requested information harm Commonwealth-State relations?
• **add value for Tasmania for the effort required to prepare it?**
  
  Consider whether adequate resources are available to ensure that a high-quality, evidence-based submission can be prepared. A submission that is rushed and lacks crucial context or information may be counter-productive. The expected benefit of providing a submission should be weighed against the resources required to prepare, clear, and lodge the submission. The associated process for making submissions should be taken into account.
  
  – Will Tasmania benefit from making a submission?
  
  – Are adequate time and resources available to ensure a high-quality submission?
  
  – Do the benefits of making a submission outweigh the resources necessary to prepare, clear, and lodge the submission?

• **mitigate significant risk to Tasmania?**
  
  There may be significant risk to Tasmania from the potential outcomes of an Inquiry or a Review. It is important to consider strategic risks that may arise, as well as the potential benefits.
  
  Any potential funding implications will be particularly important considerations, but there may also be other risks such as attempts to transfer responsibility for issues between levels of government, or to reduce services, reduce the flexibility of the Tasmanian Government, or to alter regulations or systems in a way that has a particular impact on either the Government, private, or community sectors in Tasmania.
  
  Where Inquiries and Reviews are highly contentious or politically motivated, such as some Senate Inquiries initiated by opposition parties to scrutinise or put political pressure on the policy or actions of the Australian Government, it may be more appropriate not to make a submission although this will need to be weighed against potential issues arising under other principles.
  
  Requests for ‘factual’ submissions or information also need to be considered carefully, as a factual request that seems straightforward may be strategically significant. For example, factual information could be used to impose targets linked to funding.
  
  – Are there funding implications for Tasmania?
  
  – Do the potential outcomes of the Inquiry or Review pose significant risk to Tasmania?
  
  – Why is Tasmania being asked to submit or provide information?

**A submission may not be necessary**

In many cases, once the above principles are considered, a submission will not be necessary. There is no default position about making a submission, and often it will not be the best use of limited resources. Where application of these principles does not support making a submission, departments can use these principles (and any other relevant factors) to justify and explain the decision as necessary in accordance with the ‘Process’ document.