



Listen Assist Resolve

8 April 2015

Manager, Small Business Ombudsman and Programmes Unit
Small Business, Competition and Consumer Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600
By email: small.business@treasury.gov.au

Exposure Draft: Australian Small Business and Family Enterprise Ombudsman Bill 2015

Thank you for the opportunity to comment on the exposure draft legislation establishing the Australian Small Business and Family Enterprise Ombudsman (ASBFEO).

The Energy and Water Ombudsman (Victoria) (EWOV) is an industry based external dispute resolution scheme that helps Victorian energy and water consumers by receiving, investigating and facilitating the resolution of their complaints. EWOV's services are free for consumers and provide an independent, fair and effective process for the resolution of complaints.

EWOV is also a founding member of the Australian and New Zealand Ombudsman Association (ANZOA). EWOV wholly supports ANZOA's submission to Treasury about the exposure draft legislation for the establishment of the ASBFEO.

As outlined in our response to the *Small Business and Family Enterprise Ombudsman Discussion Paper* of 30 April 2014, EWOV welcomes support for small businesses and family enterprises.

However, as detailed in the ANZOA submission to Treasury following the release of the exposure draft legislation, we believe that the ASEBFEO would not be an Ombudsman scheme. It would not fulfil the fundamental criteria of being independent, nor have a dispute resolution role as its core purpose. In addition, the planned advocacy role for the ASEBFEO is not an Ombudsman function.

Should you require further information or have any queries, please contact me on 03 8672 4460.

Yours sincerely

Cynthia Gebert
Energy and Water Ombudsman (Victoria)