

Submission

by



NEW ZEALAND
FOREST OWNERS' ASSOCIATION INC.

to

Accident Compensation Commission

on

Levy Rates 2004/05 Consultation

16 September 2003

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1. The NZ Forest Owners Association (NZFOA) welcomes the opportunity to comment on the ACC's proposed levy rates and structure for 2003/2004.
2. The Association is a voluntary organisation representing the interests of commercial forest growers. The Association has 260 members whose forest holdings represent approximately 85% of New Zealand's commercial forest estate. The members include all the major forest corporates, the majority of medium sized forest companies, many forest syndicates, and a number of farm foresters.
3. The Association works very closely with the NZ Forest Industry Contractors Association (FICA), whose members are the major employers of those employees covered by levy rate groups 140 and 150.
4. For this reason, the NZFOA does not propose to make a lengthy submission but rather to fully endorse the views expressed in the FICA submission (copy attached).
5. The NZFOA reiterates its view expressed in previous submissions on ACC levies that the current system provides insufficient incentives for improved safety performance or rewards for those employers with lower than average accident rates.
6. While employers already implement safety policies and practices to reduce employment costs, increase productivity and increase staff morale, a properly structured accident levy system would add another important incentive.
7. While, too, there is some relationship between safety systems and safety outcomes, systems on their own do not necessarily result in an improved safety culture in a workplace; ultimately the only way to reduce workplace accidents.
8. The Association therefore again urges the Government and the Corporation to introduce a system to financially recognise and reward individual employers for improved safety performance.