



PGPA Act Review
Attention: Review Secretary
Department of Finance
One Canberra Avenue
FORREST ACT 2603

Email: PGPAActReview@finance.gov.au

Dear Review Secretary

Public Governance, Performance and Accountability Act 2013 and Rule Independent Review

Thank you for the opportunity to provide a submission on behalf of the Great Barrier Reef Marine Park Authority (the Authority) to the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule) Independent Review.

Overall, the PGPA Act and Rule has supported the Authority in meeting its legislative requirements and improving its governance and accountability. In particular, the support materials and guidance provided during the transition to the PGPA Act and Rule, and since that time, have been helpful and we would encourage further guidance to be developed and made available. As a small non-corporate entity based in North Queensland, access to guidance materials is important as we are not always able to attend Canberra forums on PGPA Act or related matters in person. We have also noted that with the implementation of the new legislative framework there has been an increase in internal process and reporting requirements and as a small non-corporate entity, this can be challenging to manage within our existing staffing levels.

Immediately prior to transitioning to the PGPA Act as a non-corporate entity, the Authority was under the *Financial Management and Accountability Act 1997* having transitioned from the *Commonwealth Authorities and Companies Act 1997* a number of years earlier. Since that initial transition, the Authority has found that by no longer being able to accept donations or hold funds, the potential for the Government, through the Authority, to draw on and encourage additional philanthropic or other non-Government revenue is being impeded. The challenges the Great Barrier Reef is facing are significant and as an international and Australian icon, there is increasing interest from the private sector to contribute to the future protection of the Great Barrier Reef.

The implementation of the Commonwealth Risk Management Policy has provided the Authority with a strong basis on which to update and ensure our processes are contemporary and in line with the Commonwealth framework.

The performance framework established by the PGPA Act and Rule is an area where further guidance and clarification would be valuable. Further guidance would be helpful on the

requirements for annual performance statements, and in particular, for audit committees of Commonwealth entities that sets out the requirements with regards to its functions in reviewing performance reporting (Rule 17 refers). Additional guidance for entities and their audit committees on this matter would likely assist in ensuring the review and reporting requirements are met.

The Authority works closely with a number of other Commonwealth entities, including through a number of formal Memorandum of Understandings, and supports the intent of Section 17 of the PGPA Act that requires an accountable authority to '*encourage officials of the entity to cooperate with others to achieve common objectives, where applicable*' and would welcome further guidance on this section to assist entities in understanding their obligations with regards to this section.

Thank you for the opportunity to make a submission and I confirm we are comfortable to have this submission published.

Yours sincerely



Russell Reichelt
Chairman

10 November 2017