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# INJURED SERVICE PERSONS ASSOCIATION NATIONAL

(Peacetime Injuries)

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## Response to the Options Paper of the Review of the Permanent Impairment Guide August 2009

The ISPA's response to the options paper is small in comparison with the options presented with comment restricted to the financial and threshold aspects.

Defence personnel affected by the SRCA will continue to be administered under the PIG 1 as was promised during the PIG 1 review some years ago.

We would also like to note that while the RSL is a highly respected veteran organisation we don't believe their submission regarding thresholds would be supported by those RSL advocates who are trained in the SRCA and represent those ex-service people in their claims.

Most if not all advocates would support a greatly reduced threshold.

### **Adequacy of Current Impairment Benefits**

We understand the rationale behind the difference between death and PI but still believe that as the PI level increases so should the payment which in all reality would close the gap and not restricted those impaired above 90%.

We still insist that common law payments be increased as originally presented. We note that the only resistance comes from an employer. An increase in common law payments would ensure employers are held accountable in duty of care of their employees.

The ISPA prefers Option 3 with an increase to common law amounts as submitted.

#### **4. Separate Payments for PI & NEL**

The ISPA prefers the separate payments to continue as this allows a claimant to be able to accept some payment while appealing the amount of the other.

#### **5. Reasonableness of Current Impairment Thresholds**

The ISPA maintains its position on the reduction of impairment thresholds. It is again interesting to note that those opposed to the reduction of the threshold are the employers, Comcare and for some strange reason the RSL.

Considering the RSL's expertise is the Veterans Entitlement Act which **doesn't encompass any threshold**, it would therefore be appropriate to disregard their recommendation in this matter. The RSL hasn't given any rationale as to why the threshold is adequate.

We understand the employers and Comcare's opposition to the reduction as purely fiscal.

The ISPA prefers Option 1.

#### **6. Multiple Injuries**

The SRCA was apparently constructed as a beneficial scheme and as such should not financial disadvantage an employee.

Combining impairments should occur if it is more beneficial to the claimant.

As stated in our original submission, by reducing the threshold the multiple injuries and combining impairment debate becomes redundant.

The ISPA prefers Option 1 of discussion 5.

Yours sincerely

Ray Brown  
National President