

Mr Ian Campbell
Secretary
DVA

Dear Ian

Response to the Options Paper of the
Review of the Permanent Impairment Guide

AVADSC response to this review has been handled by our representative of the Council and is in the same terms as per the ISPA submission as follows.

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 AVADSC 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 AVADSC 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 ISPA's original submission, by reducing the threshold the multiple injuries and combining impairment debate becomes redundant.

The ISPA AVADSC prefers Option 1 of discussion 5.

Yours Sincerely

C.R Doust
National Secretary