



08<sup>th</sup> November 2013

Ms Lara Emery  
Paralegal, Legal Section  
Australian Human Rights Commission  
GPO Box 5218,  
Sydney NSW 2001

By email: [legal@humanrights.gov.au](mailto:legal@humanrights.gov.au).

Dear Lara

Many thanks for your consideration of our request for submission of comment regarding the Department of Social Services application for temporary exemption under section 55 of the Disability Discrimination Act 1992 in connection with the use of the Business Services Wage Assessment Tool.

Within the limits of our role in the DEES scheme JAS-ANZ appreciates the opportunity to acknowledge support for the application.

Please find attached our submission which is concerned principally with our understanding of the implications of *Nojin v Commonwealth of Australia* [2012] 208 FCR 1 for the conduct of accreditation and certification under the DEES

Yours sincerely

James Galloway  
Chief Executive Officer  
Joint Accreditation System of  
Australia and New Zealand

JOINT ACCREDITATION  
SYSTEM OF AUSTRALIA  
AND NEW ZEALAND  
HELPING MARKETS  
WORK BETTER

**Australia**

FECCA House  
4 Phipps Close  
Deakin, ACT 2600

PO Box 5634  
Hughes, ACT 2605

Phone: +61 (0)2 6232 2000

**New Zealand**

Level 2 Berl House  
108 The Terrace  
Wellington 6143

PO Box 10476  
The Terrace  
Wellington 6143

Phone: +64 (0)4 473 4426

[www.jas-anz.org](http://www.jas-anz.org)



QMS, EMS, Product