Thank you for the opportunity to comment on Australia's First Open Government National Action Plan 2016-18. My feedback is focused on open data.

I congratulate you on your decision to adopt the International Open Data Charter. In combination with the Australian Government Public Data Policy Statement you have a strong set of principles to follow.

To adopt the International Open Data Charter requires responsibility assigned to implement a set of time-bound, verifiable actions. I hope to see a level of community consultation in designing the action plan, or least leveraging the feedback received via the Open Government Partnership and Data Availability and Use consultations.

Both the policy and charter require you to release high-value, non-sensitive, data. I would suggest that data specified in the ANZLIC Foundation Spatial Data Framework is high value and should be released for free. This data is core reference data that make it possible to join many other datasets together. The release of the Geocoded National Address File has been an excellent first step.

Both the policy and charter require publishing open data in machine-readable, open formats using open standards. The adoption of the Open Contracting Data Standard is a first good step in publishing data using an open standard. I believe you need to describe the process that you will follow to collaboratively agree on other open standards and openly publish the collection of adopted standards. This will help others know how they can publish their data so it can be compared and combined with Australian Government open data to create further value.

One challenge in adopting an open data standard that is relevant to Australia is that standards that are mandated by law are not openly accessible. For example, in trying to create a data standard to help people that use wheelchairs access community facilities and public transport, standards such as AS1428.1 Design for access and mobility must be purchased. This barrier has been recognised by the Parliament in the Netherlands that recently passed a legislative requirement that all standards mandated by law must be made freely available. It is good to see that some Australian standards, such as the Australian Building Codes are being openly released and I hope to see this trend continue.

I support the principle stated in the Public Data Policy Statement that, "*Australian Government entities will ensure all new systems support discoverability, interoperability, data and information accessibility and cost-effective access to facilitate access to data*". I think this could be expanded beyond just systems. For example the copyright issues encountered in consolidating data for the National Public Toilet Map and the Australian Flood Resource Information Portal have resulted in data not being released or significant work being required to address rights issues. I would like to see the guidance on avoiding these issues made publicly available so that more data be openly released.

Congratulations on Australia's First Open Government National Action Plan, I believe it is a step in the right direction.

Stephen Gates

2016-11-03