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Chief Executive:  
Belinda Robinson

25 March 2014

Mr David Sullivan  
Committee Secretary  
Foreign Affairs, Defence and Trade Legislation Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
[fadt.sen@aph.gov.au](mailto:fadt.sen@aph.gov.au)

Dear Mr Sullivan

### Ongoing scrutiny into the implementation of the Defence Trade Controls Act 2011

Universities Australia welcomes the opportunity to provide comment on the implementation of the *Defence Trade Controls Act 2011*. There has been significant work undertaken since the first progress report and Universities Australia appreciates the efforts of the Strengthened Export Controls Steering Group and the Defence Export Controls Office (DECO) to ensure an outcome that addresses the concerns raised by the university research sector.

Universities Australia strongly advocates that this open and consultative process continues. The pilot program established by the steering group to test the impact of the Act is progressing well. The University of Queensland and Curtin University are involved in this pilot program.

However, it is vital that the draft amended legislation is provided to the pilot institutions with sufficient time for testing. It is likely that further issues with the implementation of the Act will be highlighted as the proposed solutions are tested. There is still considerable work and consultation to be undertaken before the end of the transition period and stakeholders need to be given sufficient time to put in place the necessary procedures.

Universities Australia also appreciates the efforts of DECO in working with the Sanctions area of the Department of Foreign Affairs and Trade in improving communication with the university sector. There are a number of obligations that universities are required to meet that are relevant to the Foreign Affairs, Defence and Trade Legislation Committee and greater alignment where possible is important to reducing the regulatory and compliance burden on the sector.

One Geils Court  
Deakin ACT 2600

GPO Box 1142  
Canberra ACT 2601  
AUSTRALIA

Ph: +61 (0)2 6285 8103  
Fax: +61 (0)2 6285 8101  
Mobile: +61 (0)412 220 882

[brobinson@universitiesaustralia.edu.au](mailto:brobinson@universitiesaustralia.edu.au)  
[www.universitiesaustralia.edu.au](http://www.universitiesaustralia.edu.au)

We welcome the Committee's commitment to actively scrutinising this process and look forward to continuing to assist with the effective implementation of the Act.

Yours sincerely

Belinda Robinson  
**Chief Executive**