

25/09/2025

To the Community Affairs Legislation Committee Secretariat,

I make this submission to strongly oppose significant aspects of the *Australian Centre for Disease Control Bill 2025* and its companion bill, unless they are substantially amended. The creation of a centralized, powerful CDC with sweeping powers—especially in times of crisis—raises serious constitutional, accountability, privacy, and democratic risks.

The extraordinary powers to override existing laws during declared health emergencies, to compel data, to enter international arrangements, and to centralize the IHR focal point function threaten to erode both Australia's sovereignty and the checks and balances essential in a liberal democracy.

Particularly concerning are:

1. The ability to bypass parliamentary treaty review via non-treaty international arrangements, enabling external standards to influence domestic policy without oversight.
2. Emergency authorisations that override any other law, including privacy, secrecy, or data protection, without prior review.
3. Centralizing the IHR functions in the CDC, reducing ministerial or parliamentary control.
4. The expansive scope of "public health matters," which invites mission creep into areas beyond infectious disease.
5. Broad transparency exemptions and FOI carve-outs that may conceal critical decisions.
6. Powers to compel private or foreign entities and penalise non-compliance, risking dissemination of data beyond public law safeguards.
7. Insufficient ex ante parliamentary control and institutional concentration of power in a non-elected figure.
8. Risks of politicisation, capture, inefficiency, duplication, liability gaps, constitutional conflict, and cyber/data security vulnerabilities.

To be viable and legitimate, any duty given to the CDC should be tightly circumscribed, with robust oversight, clear limits, appeal and redress mechanisms, security safeguards, and explicit parliamentary and ministerial controls.

I urge the Committee to either reject the Bills in their current form, or demand sweeping amendments to rein back excessive powers, ensure democratic oversight, and protect privacy and sovereignty.

Thank you for your consideration.

Yours Sincerely

Dr Duncan Syme  
MBBs FRACGP DROCG DPD