



Animal Health Alliance  
SOLUTIONS FOR THE FUTURE

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17 December 2012

Committee Secretary  
Senate Rural and Regional Affairs and Transport  
Legislation Committee  
PO Box 6100  
Parliament House  
Canberra  
ACT 2600

Email to: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

### **Inquiry into the Biosecurity Bill 2012 and the Inspector-General of Biosecurity Bill 2012**

The Animal Health Alliance (Australia) Ltd (the Alliance) is the voice of the animal health industry in Australia. It represents registrants, manufacturers and formulators of animal health products. The association's member companies represent in excess of 85 per cent of all animal health product sales in Australia (ex factory gate). The Alliance manages both national and state issues with the objective of ensuring its members can operate within a viable regulatory environment. The Alliance also contributes to sustainable industry risk reduction practices that provide business opportunities to members and add value to the broader Australian community.

The Alliance welcomes this opportunity to make this submission to this inquiry.

The Alliance member companies are significantly impacted by the past operations of the Australian Quarantine and Inspection Service in relation to product importation and how it impacts on conducting business in Australia.

Alliance member companies were anticipating with the New Biosecurity Legislation a shift to a true risk management approach by Biosecurity Services for the operation of the new Bill.

The Alliance and our member companies were bitterly disappointed by the outcome and the intent of the new Biosecurity Legislation as in the briefing offered to our industry on 16 July 2012 we were informed by the consultants – PricewaterhouseCoopers – who were retained by DAFF to assist in developing the new Bill – that nothing had or will change in the future in relation to how Biosecurity Services will risk manage veterinary chemical products (pharmaceuticals, biologicals and ectoparasiticides) and their input components.

As such the existing impediments for the Alliance member companies in doing business within Australia and similarly growing business plus investing in R&D will remain. The Australian animal health industry is unable to access the latest technological advances available overseas and as such our industry's competitiveness is decreased.



Please find attached the earlier submission supplied to DAFF from the Alliance dated 3 August 2012.

If you have any enquiries regarding the Alliance submission please contact me on 02 6257 9022.

Yours sincerely

Dr Peter Holdsworth AM FAICD  
Chief Executive Officer

Animal Health Alliance (Australia) Ltd

*Attachment 1 – Submission dated 3 August 2012 – Alliance submission to the New Biosecurity Legislation.*



**ATTACHMENT 1.**



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3 August 2012

Biosecurity Legislative Reform Section  
Department of Agriculture, Fisheries and Forestry  
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**Alliance submission to the New Biosecurity Legislation**

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The Alliance welcomes the opportunity to offer the following comments on the draft Biosecurity Legislation Bill that was released for a 5 weeks public consultation period (closing 10 August 2012).

The Alliance acknowledges the series of stakeholders of public consultation meetings occurring around Australia on this draft Bill.

The Alliance participated in an industry stakeholder consultation meeting in Canberra on 16 July 2012. Within that meeting we received a brief from PricewaterhouseCoopers who were retained by Government for this project.

That PricewaterhouseCoopers brief informed us that with respect to veterinary chemical products (pharmaceuticals, biologicals and ectoparasiticides) and their input components there is not planned to be any changes in the operational processes or the risk approach taken by Biosecurity Services with respect to such product types.



On the basis that this brief is correct the Alliance sees no value for our industry to invest further resources in this consultation process.

Regards

Dr Peter Holdsworth AM FAICD  
Chief Executive Officer  
Animal Health Alliance (Australia) Ltd