

To Sue Holmes - Productivity Commission.

Comments from Graham B Jackson, Managing Director, Graham B Jackson Pty Ltd  
125 Thomas Street, Dandenong 3175

Firstly I have been away from the office for nearly a month and have only got part way into your Draft Research Report on Standard Setting & Laboratory Accreditation, however I am anxious to raise a particular point with you in order to ensure you have adequate time to consider the matter.

I note in a number of places in the draft report reference to 'NATA as the national authority and the peak authority for the accreditation of laboratories and **certified reference material suppliers** .....

I particularly want to draw attention to the use of the term 'suppliers' when I suspect you mean 'producers'. The distinction is important. My company acts as a supplier of certified reference materials but does not produce any such materials.

We draw supplies of CRMs from some 150 laboratories around the world and supply to customers in Australia and to a minor extent in the Pacific islands etc We hold an extensive library on what CRMs are available world wide and are able to guide our clients as to what may best suit their needs. We handle all aspects of the importation of these goods including foreign exchange, Customs entry, Quarantine, Hazardous Goods regulations, etc. Our premises are approved by AQIS as Quarantine Approved Premises (QAP) and we comply with all requirements of AQIS for the handling of quarantine sensitive materials that are within the scope of our approval from AQIS.

In addition we maintain records on all CRM's that have been supplied to our clients - in fact our data base holds details on every single CRM we have imported in the last 24 years - almost 25 years. This later point is of importance as it is not unknown for a producer of a CRM to subsequently publish an amendment to the Certificate of Composition and to advise all purchasers of this change. We are able to pass on this information to our clients. This service is not always available from laboratory supply houses and other importers.

It may be desirable that NATA's role include accreditation of **suppliers** of CRMs in addition to accreditation of **producers** of CRMs - that is a matter best discussed with NATA. I am aware that NATA has concerns that some suppliers/importers treat CRMs as just another commodity and do not retain the ability to identify past recipients of particular CRMs and thus the ability to pass on details of amendments to certificates of composition.

Both NATA and AQIS may well have views on the desirability of accrediting suppliers of CRMs and I suggest you approach them on this matter. My concern is to ensure my company provides a high level of service to our clients whilst complying in full with all requirements of AQIS, ACS etc

With regards  
Graham B Jackson