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Ms Sue Holmes
Standards and Accreditation Study
Productivity Commission
PO Box 80
Belconnen ACT 2616

12 April 2006

Dear Ms Holmes

**REVIEW OF AUSTRALIAN GOVERNMENT'S RELATIONSHIP WITH STANDARDS
AUSTRALIA LIMITED AND THE NATIONAL ASSOCIATION OF TESTING
AUTHORITIES, AUSTRALIA**

Queensland Health Pathology and Scientific Services (QHPSS) is the major supplier of laboratory services to Queensland Health. QHPSS administers 33 pathology laboratories located in public hospitals throughout Queensland ranging from major teaching hospitals such as Royal Brisbane and Women's Hospital, through to regional centres such as the Townsville Hospital and including district laboratories from Warwick to Thursday Island and west to Mt Isa. QHPSS also provides public health and forensic science services to Queensland government agencies, local government and commercial clients in Australia and internationally. Further information regarding the organisational capabilities of QHPSS can be found on our web site at www.health.qld.gov.au/qhps. QHPSS works closely with certification and accreditation agencies to ensure safe and reliable provision of services from its laboratories. To an extent the certification and accreditation is reliant on adherence to international standards. QHPSS is supportive of the role played by Standards Australia and NATA in ensuring the quality of laboratory services provided to the people of Queensland.

NATA currently uses peer assessors to carry out accreditation assessment of laboratories. State Government laboratories bear much of this load due to their perceived lack of commercial interests and the reluctance of some commercial laboratories to wear the resource burden of letting staff assist in audits. In the past NATA was able to reward assessors with the award of training vouchers which could be used to send staff to attend NATA courses. Unfortunately changes introduced by the Australian Tax Office have put an end to this benefit. It would be beneficial if alterations to the tax system or direct funding of NATA to compensate for this loss could be introduced to give some recognition of assistance provided by participating laboratories. This could also be structured in a way to encourage larger numbers of laboratories including commercial laboratories to participate in peer assessments. Currently there are 17 scientists at the Queensland Health Scientific Services

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laboratories and 63 scientists from Queensland Health Pathology Services laboratories who regularly participate as peer assessors. There is a significant impact on the organisation when these people are away from the laboratory performing assessments.

QHPSS is highly concerned about the potential for duplication of accreditation requirements from multiple Commonwealth agencies. It is not just NATA, but OGTR, AQIS and TGA as well who are performing accreditation inspections in our laboratories. There is often overlap in the work they do and a requirement to coordinate their activities would be beneficial. The current move by the Therapeutic Goods Administration into the Medical Testing sphere is seen as unnecessary duplication that leads to increased costs without adding any specific benefit. Rather than increase the number of accrediting bodies undertaking these activities the Commonwealth Government should ensure that any new requirements are administered by the current body.

QHPSS adheres strongly to the principles of good laboratory practice. The entire organisation is certified to ISO 9001:2000 and all laboratories hold appropriate NATA accreditation in their sphere of operation. The accreditation of any laboratory offering services to the public or receiving government funding should become mandatory.

I would be happy to discuss further matters pertaining to the terms of reference of the research study with members of the Commission.

Yours sincerely

Chris Hall
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Pathology and Scientific Services
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