

30 May 2018

Dr Vivienne Thom  
DTC Act Review  
R1-3-A003B  
PO Box 7901  
Canberra BC ACT 2600

[dtcact.review@defence.gov.au](mailto:dtcact.review@defence.gov.au)

Dear Dr Thom,

### **Review of the *Defence Trade Controls Act 2012***

Thank you for the opportunity to provide input into the review.

Universities Australia (UA) is the peak body representing Australia's 39 comprehensive universities in the national interest.

UA has encouraged our member universities to make submissions to the review, and to include the examples you requested to build an evidence-base on their experiences of the implementation of *Defence Trade Controls Act 2012* compliance in their individual institutions.

- 1) Broad feedback from the sector has indicated that the Defence Export Controls (DEC) team is well respected for providing high-quality, timely advice. The level of service provided is appreciated and valued. This includes the workshops and training offered by DEC.
- 2) Feedback previously provided by the DEC team to the sector noted that universities are proactively complying with their obligations under the *Act*, and that the majority of inquiries to DEC fall significantly short of thresholds that trigger the requirement to hold a permit under the *Act*.

Through the process of the Review, there may be an opportunity to reduce the number of unnecessary inquiries to DEC, prompted by the caution of researchers to ensure they are working within the boundaries of the *Act*, through further clarification of definitions (particularly those relating to the stage of development of a technology) and ensuring publicly available guidance is as clear as possible.

We note that the university sector engaged constructively with the Department of Defence to address significant issues in the original *Act*; this work led to the introduction of the Defence Trade Controls Amendment Bill 2015.

Should significant change be considered as a result of your review, we would appreciate the opportunity to again work with the Department to analyse impacts, and work towards an optimal regulatory system.

We look forward to further discussion through the course of the review.

Yours sincerely



Catriona Jackson  
**CHIEF EXECUTIVE – DESIGNATE**