

Dear Sir/Madam,

I am writing on behalf of the Council of Australian Biological Collections (CABC) which represents the Council of Heads of Australian Faunal Collections, the Council of Heads of Australasian Herbaria, the Council of Heads of Australian Entomological Collections and Australian Biological Resources Study.

The CABC represents museums, herbaria, universities and CSIRO which are repositories of collections of plants and animals which document Australia's biodiversity. The collections are used for study by scientists in Australia and around the world to increase our understanding of biodiversity. Together, members of CABC are custodians of a distributed national biodiversity collection holding in excess of 36 million specimens of Australian and non -Australian plants, algae, fungi, insects, animals and microbes in over 20 leading institutions.

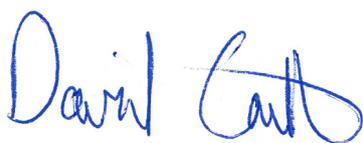
A core business activity associated with the collections is to send plant and animal specimens to overseas institutions for study, subject to national and international regulations. The flow of material into and out of Australia results in world authorities annotating and describing specimens and ensures that our knowledge of what is held in our collections are up-to-date. This allows us to determine what is genetically unique and thus worthy of our highest levels of protection. It also ensures that we are best placed to be able to identify new and invading species from the reference material held in the institutions. Both outcomes are entirely dependent on having up-to-date identifications by the experts in particular groups, and these experts often reside outside of Australia. Thus the flow of material benefits the researcher, institution, and Australia.

We strongly support the objectives of the EPBC Act and welcome any opportunities to strengthen and increase efficiencies in implementing the Act. We have reviewed the Consultation Paper on cost recovery under the EPBC Act and note that Appendix B of the Consultation Paper lists those EPBC Act activities which are considered 'out of scope' for cost recovery.

Our particular concern is that activities associated with the registration of scientific organisations to receive and send CITES and non-CITES listed material for non-commercial exchange of scientific specimens has not been listed in Appendix B. Registration of scientific organisations primarily benefits environment and biodiversity research. Activities are public good in nature and cost recovery is inconsistent with policy objectives.

We recommend that activities associated with the registration of scientific organisations to receive and send CITES and non-CITES listed material for non-commercial exchange of scientific specimens be listed in Appendix B as 'out of scope' for cost recovery.

Yours faithfully



Professor David Cantrill

Chair, Council of Australian Biological Collections (CABC)

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