

# PUBLIC CONSULTATION - PROCEDURES FOR MAKING SUBMISSIONS

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**NHMRC**

National Health and Medical Research Council

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## THE NHMRC IN BRIEF

The National Health and Medical Research Council (NHMRC) consolidates within a single national organisation the often independent functions of research funding and development of advice. One of its strengths is that it brings together and draws upon the resources of all components of the health system, including governments, medical practitioners, nurses and allied health professionals, researchers, teaching and research institutions, public and private program managers, service administrators, community health organisations, social health researchers and consumers. The functions of NHMRC come from the statutory obligations conferred by the *National Health and Medical Research Council Act 1992* (the Act).

The Act sets down four statutory obligations on the directions taken by NHMRC. These obligations are:

- to raise the standard of individual and public health throughout Australia;
- to foster the development of consistent health standards between the various States and Territories;
- to foster medical research and training and public health research and training throughout Australia; and
- to foster consideration of ethical issues relating to health.

The Council comprises nominees of Commonwealth, State and Territory health authorities, professional and scientific colleges and associations, unions, universities, business, consumer groups, welfare organisations, conservation groups and the Aboriginal and Torres Strait Islander Commission.

## APPROACH TO CONSULTATION BY COUNCIL

The Council undertakes its advisory role with the assistance of an extensive structure of committees, working parties and expert panels. The substantial networks represented in this structure are used both to disseminate information about the Council's activities and to assist the Council to gain a full appreciation of the range of views in the community. This networking complements the public consultation processes.

The Council is keen to ensure that the Australian community has the best opportunity to participate in developing Council reports. For this reason a consultation strategy is an important part of any recommendation or guideline development process. The strategy will identify

individuals and organisations who have a special interest in the topic under consideration and who will receive direct contact from Council. In developing the timetable for consultations the need to allow adequate time for participants to undertake their own processes is taken into account. Other current consultative activities relevant to the issues are also taken into consideration.

Participants involved in consultations will be provided with:

- information about the reasons for the consultation;
- any other available background information; and
- a contact name.

The Act sets out steps to be followed by the Council in consulting people and bodies when it intends to:

- make a regulatory recommendation;
  - that is, a recommendation of the Council that is intended to be given legal effect in a State or Territory by legislation of that State or Territory;
- issue guidelines;
- approve guidelines developed by other organisations; or
- engage in other activity prescribed in regulations to the Act;
  - the Council's present plans do not include any activities that will need to be prescribed.

## THE CONSULTATION PROCESS

Council now has two separate consultation processes as follows.

### Regulatory recommendations and prescribed activities

Council follows a two stage consultation process. Firstly, Council will advertise its intention to develop a regulatory recommendation or engage in a prescribed activity. At this stage Council will seek comment on its intentions.

Once comments have been received and considered, Council will draft the regulatory recommendation or refine its prescribed activity and will then publish a second notice asking for comment on the actual draft.

Notices for both these stages of consultation will be published in the Commonwealth Gazette and on the NHMRC website. Copies of draft documents and supporting information will be available free of charge from the Office of NHMRC and on the NHMRC website. In addition, notices may be included in other publications and media such as newspapers and radio, and will be circulated to bodies that are expected to be interested.

The notices will state:

- that submissions should normally be in writing but would also be acceptable on audio tape;
- details of where, and by when, the submissions are to be lodged; and
- whether it is intended to conduct other forms of consultation.

### **Development of guidelines**

Council undertakes a single stage of consultation. When Council has determined a need for a guideline, undertaken the initial research and developed a draft of the guideline, a notice inviting submissions will be published in the Commonwealth Gazette and on the NHMRC website. The notice will give the same information referred to above.

In addition, notices may be included in other publications and media, such as newspapers, and the draft guideline will be circulated to bodies that are expected to be interested.

### **Consideration of submissions**

All submissions will be acknowledged upon receipt. All submissions will be considered. The committees are obliged to report to Council on the consultation process, including showing how they have addressed the comments that submitters have made.

### **Variations to standard consultation arrangements**

On occasions it is necessary for Council to modify the consultation process, for example in an emergency situation or where proposed recommendations or guidelines are of minor significance. The Act allows Council to take this course of action.

If this happens, Council will advertise its reasons for making such a decision. In the case of an emergency situation, Council will also consult formally with interested individuals and organisations before confirming its original decision. The Act sets out strict timeframes for this type of consultation.

## **HOW TO WRITE A SUBMISSION**

Submissions should be clear and concise, preferably typewritten and submitted as an original by mail or email. Facsimile copies will be accepted, but are sometimes difficult to read. Audio tapes will also be accepted.

Each submission should include:

- the submitter's name and address;
- names of any additional contributors to the submission who may wish to be acknowledged;
- contact telephone numbers in case Council needs to clarify any points, obtain additional information, or advise if the submission appears incomplete (eg pages missing); and
- fax and email address where possible.

Submissions to Council need to include specific information that will help Council to consider the point(s) being made. Evidence that supports the point(s) being made should include full references and copies of material referred to. If it is not possible to include such references, please include as much detail as possible.

Information in the submission should be in a logical order, preferably following the layout of the consultation document (for instance, use the same chapter headings and sub-headings). Quote the page number relevant to the point(s) being made.

There is no set length for a submission and, in fact, the length will vary depending on the complexity of the issue and the number of comments a submitter wants to make. However, submissions should balance the need to provide as much information as possible with a need to be concise. If particular length restrictions are set, they will be specified in the notice inviting submissions.

## **GENERAL INFORMATION ON COUNCIL'S ACTIVITIES**

Information on the activities of the Council can be obtained from its secretariat by phoning (02) 6289 9184, faxing (02) 6289 9197 or writing to:

The Executive Secretary  
National Health and Medical Research Council  
Office of NHMRC  
(MDP 100)  
GPO Box 9848  
Canberra ACT 2601

The Council's Secretariat circulates periodically a catalogue of Council publications and is able to provide synopses of publications upon request. Most of Council's publications are available through AusInfo (contact details on back page). There are also many NHMRC publications available on the NHMRC website, including synopses.

# How to Contact Us

## General

Postal: The Executive Secretary  
National Health and Medical Research Council  
Office of NHMRC  
(MDP 100)  
GPO Box 9848  
Canberra ACT 2601

Physical: The Executive Secretary  
National Health and Medical Research Council  
Office of NHMRC  
32 Corinna Street  
Woden ACT 2606

Phone: +61 2 6289 9184  
Fax: +61 2 6289 9197  
Email: [exec.sec@health.gov.au](mailto:exec.sec@health.gov.au)

## Publications

The Publications Officer  
Office of NHMRC  
(MDP 100)  
GPO Box 9848  
Canberra ACT 2601

Phone: +61 2 6289 9520  
Toll-free: 1800 020 103 (inside Australia only)  
Fax: +61 2 6289 9197  
Email: [nhmrc.publications@health.gov.au](mailto:nhmrc.publications@health.gov.au)

## Web Site

The NHMRC Webmaster  
Office of NHMRC  
(MDP 100)  
GPO Box 9848  
Canberra ACT 2601

Phone: +61 2 6289 9173  
Fax: +61 2 6289 9197  
Email: [nhmrc.webmaster@health.gov.au](mailto:nhmrc.webmaster@health.gov.au)  
Internet: <http://www.nhmrc.health.gov.au>

## Research Program

NHMRC Centre for Research Management  
Office of NHMRC  
(MDP 33)  
GPO Box 9848  
Canberra ACT 2601

Phone: +61 2 6289 9167  
Fax: +61 2 6289 9132  
Email: [nhmrc.research@health.gov.au](mailto:nhmrc.research@health.gov.au)

## Advisory Program

Health Advisory Section  
Office of NHMRC  
(MDP 100)  
GPO Box 9848  
Canberra ACT 2601

Phone: +61 2 6289 9188  
Fax: +61 2 6289 9180  
Email: [health.advisory.cttee.nhmrc@health.gov.au](mailto:health.advisory.cttee.nhmrc@health.gov.au)

## Ethics Program

Health Ethics Section  
Office of NHMRC  
(MDP 70)  
GPO Box 9848  
Canberra ACT 2601

Phone: +61 2 6289 9154  
Fax: +61 2 6289 9198  
Email: [ahec.nhmrc@health.gov.au](mailto:ahec.nhmrc@health.gov.au)

## AusInfo

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Internet: <http://www.ausinfo.gov.au>