



Elizabeth Hart <eliz.hart25@gmail.com>

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## Request for information re adverse experience reporting / possible conflicts of interest

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Elizabeth Hart <eliz.hart25@gmail.com>

Sun, Mar 6, 2011 at 11:03 PM

To: "SUTER, James"

Cc: Bea Mies, jennimack2, Heather Yeatman

James

I am continuing to investigate the international problem of over-vaccination of pets, a problem that has been allowed to continue for many years, facilitated in Australia by the APVMA's approval of core vaccine product label revaccination 'recommendations' which were not based on evidence of benefit. In this regard the APVMA has failed in its mission:

To protect the health and safety of people, animals and crops, the environment, and trade, and support Australian primary industries **through evidence-based, effective and efficient regulation of pesticides and veterinary medicines.** (My emphasis.)

I have a record of correspondence with the APVMA, AVA and others which demonstrates how difficult it has been to have this matter addressed in an open and transparent manner. It has taken a great deal of time and perseverance on the part of me and Bea Mies to get to where we are now.

Recently it has come to my attention that the APVMA's responses to adverse experience reports are boldly marked '**COMMERCIAL-IN-CONFIDENCE**'.

In your position as the APVMA's General Counsel:

***Q.1: Can you please advise me the legal basis for the term 'COMMERCIAL-IN-CONFIDENCE' on the APVMA's responses to adverse experience reports? It appears this term is being used to intimidate the recipient, imposing an obligation of confidentiality on the recipient, and forbidding open discussion of the APVMA's response. Can you please clarify the legality of this for me?***

I wish to address this matter in my future open correspondence. It is also pertinent on a personal basis, as I plan to make my own official adverse experience report to the APVMA in relation to my dog Sasha's death after unnecessary vaccination in September 2008. I have spent nearly two and a half years researching and campaigning on this topic now, which indicates the difficulty of having possible adverse experiences after vaccination acknowledged by the veterinary profession and industry. But of course you are aware of this via my ongoing correspondence on this matter.

Also:

***Q.2: Does the APVMA have a policy on staff and associates' relationships with industry? I am particularly interested to know if APVMA Science Fellows, or others, receive industry funding and, if so, if this potential conflict of interest is transparently recorded by the APVMA with information being accessible by the public?***

I look forward to your response.

Regards

**Elizabeth Hart**

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