

Date: 2nd April 2019

To whom it may concern

Re: Consultation Submission for Review of the Narcotic Drugs Act 1967

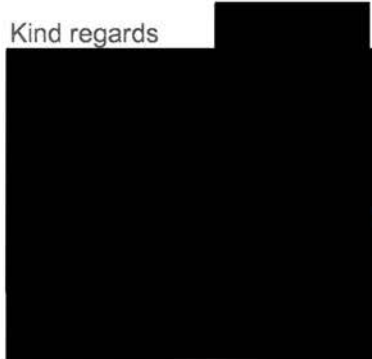
Below are the queries submitted by Medigrowers Pty Ltd for the Review.

- With the high increase in license applications being received by the ODC & the current lengthy turnaround times being experienced with applications, how are current License Holders going to be prioritised for Permit Applications, License Renewal Applications & additional License Applications?
- There is a high value of investment required to enter into this industry. License Holders therefore require clarity around the License Renewal Process & how certainty will be given that Licenses will continue to be renewed.
- After being awarded a License, the maximum period given before the License Fee is payable is 12 months from the date the License was awarded. On receipt of the License, there are still a number of things that need to take place before the business will be operational in this industry, including but not restricted to Development Application approval, building of the facility, finalising Permits etc., which could take considerably more than 12 months to finalise. It is requested that the period given for the License to be payable be extended to at least 24 months after the License has been awarded.
- Throughout the application process, a number of different ODC representatives are giving feedback or making requests in regards to the application. Would the ODC consider the allocation of a dedicated case representative to a company applying for a License, Permit or License Renewal, ensuring that the dedicated person has a clear understanding of where the application or renewal is up to & can clearly communicate what is still required for the successful completion of the application
- The ODC representative working on an application is currently responsible for ensuring that the latest versions of documents relevant to the application are being reviewed. To improve efficiencies & to ensure that the control of the latest versions of the documents is the responsibility of the applicant, would the ODC consider the implementation of a Web Portal where license applicants can upload the latest documents, replace older versions & ensure the ODC is reviewing the correct documentation throughout the application, especially when requests for updated documentation & processes are required by the ODC.
- Once a License has been awarded, is there a possibility for the license holder to be allocated a dedicated liaison with the ODC, who would be able to respond to queries as soon as possible & ensure that everything is being done correctly & in line with ODC expectations & guidelines.

- Cultivation License holders that are wanting to apply for Manufacturing & Export Licences should be given priority over non-license holders. Information submitted for the Cultivation License should also be used for the Manufacturing & Export License Applications wherever possible, rather than the current requirement of all documents having to be resubmitted & then re-reviewed, such as Fit & Proper Persons reviews etc.
- Clarity is required around the options of being able to negotiate & supply cultivated products to alternative licensed manufacturers, other than those stipulated on the cultivation license.
- There are currently only a limited number of Manufacturing Licences that have been issued, leading to a highly restricted market for cultivators to supply. In the event that approved Manufacturers are not willing to engage with approved Cultivators to purchase Australian cultivated product, approved cultivators will require other avenues to enable them to sell cultivated product, either locally or to export markets. Cultivators are embarking into considerable investments with what is currently very limited channels to sell product, which in essence is anti-competitive. What other alternative channels is the ODC working on to ensure that approved cultivators are able to operate in a less restricted market?

In the event that further discussions are required in regards to these submissions, please feel free to contact the author, as per details below.

Kind regards



Medigrowers Pty Ltd

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