

**Submission to ACCC in support of Exclusive Dealing Notification N98410 .
Hendra Vaccination as being in the public Interest.**

**Mr Richard Chadwick
General Manager of Adjudication
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601
C/- email address: adjudication@acc.gov.au**

Dear Mr Chadwick

Our club, the Hastings Valley Dressage Club Inc. (HVDC) is a small dressage club of approximately 70 members located in the mid north coast area of NSW close to Wauchope and Port Macquarie. We are affiliated with Equestrian Australia (EA) and Dressage NSW.

We run our events at the shared facility of Wauchope Showground and have no control over horses that may be stabled at the ground overnight (either for an alternative event or travelling through). The Riding for Disabled Group keeps their horses on the ground (all Hendra Vaccinated) and holds events twice weekly. Many other local equestrian groups including Pony Clubs also use the ground in addition to the once yearly Wauchope Show. Wauchope Showground has public camping and caravan sites (in very close proximity to the stable area) and regular events such as the Growers Market.

We are also in a Hendra buffer zone with competitors regularly coming the short distance from Hendra hot spots for our events. As a small committee and club, we value the health and safety of our volunteers and the general public who share the ground. We also do not feel we have adequate resources to deal with a suspected Hendra case at our events.

We wish be able to make a prudent decision to allow only Hendra Vaccinated horses our events taking into account the following:

- Department of Primary Industry (DPI) advice on managing bio security risks;
- Australian Veterinary Association advice on managing the risks associated with Hendra outbreak and local veterinary practitioners;
- Information from our club's insurance provider;
- Work, Health and Safety legislative requirements associated with the welfare of our volunteers;
- EA NSW branch; and
- The proximity of outbreaks to the Hastings Valley;
- The capabilities of a small club and committee to take on the responsibilities of a lock down situation (even a short one for a suspected case) at a public use facility.

Our Club understands that currently there is a great deal of controversy regarding whether Hendra vaccination should be mandatory or not, and that there are widespread implications for interstate and international competitors as well as significant costs. Further it is understood that many are pursuing a position that EA and its affiliates should not be allowed to mandate Hendra vaccination as a pre-condition for attending equestrian events.

Our club respects the rights of individuals to make decisions regarding the welfare of themselves and their horses. However, we remain concerned at the liability, cost and welfare implications associated with a Hendra case or a **suspected** Hendra case occurring at a club event.

Accordingly, we consider that clubs such as ours (affiliated with the EA), should be allowed have a requirement that horses competing at events be Hendra vaccinated. We need to manage the risks on the ground that we face, noting that we are in a geographic precinct that is considered to be at risk.

Our club respectfully requests that, clubs such as ours be able to take decisions appropriate to the risks being faced and not be mandated to operate in a manner that could expose the club, its committee, volunteers and its members to unnecessary risks and ongoing responsibilities and cost should we have even a *suspected* Hendra case at an event.

I trust that you will consider this submission as our ability to run future events may depend on the result.

Yours sincerely

The HVDC Inc. Committee

19th August 2015