Dear Ms Bailey,


We commend IP Australia for taking steps to align and streamline the processing for obtaining, maintaining and challenging intellectual property rights in Australia under the various pieces of relevant legislation. The majority of our comments in this letter specifically relate to the amendments proposed by IP Australia in the Intellectual Property Laws Amendment Bill 2017 (Bill) and the Intellectual Property Laws Amendment Regulations 2017 (Draft Regulations) (together, Exposure Drafts) to the Trade Marks Act 1995 (Cth) (Trade Marks Act) and the Trade Marks Regulations 1995 (Cth) (Trade Mark Regulations). We also make submissions in relation to the amendments proposed in the Exposure Drafts to s 223(9) of the Patents Act 1990 (Cth) (Patents Act) and r 22.21 of the Patents Regulations 1991 (Cth) (Patents Regulations).

Where appropriate, the submissions in this letter cross-reference items contained, and use terms defined, in the Exposure Drafts.

Executive Summary

Our primary submissions are as follows.

- The interests of both a person who exploited (or has taken definite steps to exploit) an invention during a period in which it was ceased (relevant person) and the relevant patentee would be better served in a balanced manner by preserving the mechanism in s 223(9) of the Patents Act and r 22.21 of the Patent Regulations, and including statutory guidance as to the scope and terms of the licence to exploit the invention that may be granted by the Commissioner, and providing a mechanism for the patentee to oppose an application for such a licence. Alternatively, we submit that proposed s 223H be revised to address the concerns discussed below.

- The period of acceptance of a trade mark should be preserved as 15 months, and not shortened to 9 months. The ability to obtain 6 one month “easy” extensions should also be preserved.

- A provision equivalent to that set out in item 481 (s 57D) of the Bill in respect of the Plant Breeder’s Rights Act 1994 (Cth) should be included in the Trade Marks Act, and the groundless threats law reviewed in greater depth.

- The proposed changes in Part 4 of the Bill are unhelpful and unnecessary. The requirement to provide notices “in writing” is essential from an evidentiary point of view and, even with an eye to new communication technologies that may be developed in the future, all such notices are likely to, and should still, be in writing in some form.

Patents: Extensions of Time – Protection of Third Parties

We submit that the amendments proposed by item 143 (s 223H) of the Bill and item 97 of the Draft Regulations go too far to protect the interests of third parties and risk eroding the rights of a patentee to an unjustified extent. The intention behind s 223H seems to be to codify in the Patents Act, and expand upon, the right for a person to apply for a licence to exploit an invention, and for the Commissioner to grant such licence, in certain circumstances. The current equivalent provisions of the Patents Act and the Patents Regulations are, respectively, s 223(9) and r 22.21.
We note that these submissions also apply to the right to exploit an invention proposed in item 139 of the Bill.

**Relevant Person**

Currently, in order to qualify for a licence under s 223(9) and r 22.21, a person must show that they exploited (or took definite steps by way of contract or otherwise to exploit) the invention concerned “because of the failure to do the relevant act within the time allowed”.

In *Law v Razer Industries Pty Limited* (2010) 190 FCR 166, Bennett J stated:

> Section 223(9) of the Act is not designed to protect a person who by happenstance takes steps to exploit a patent during a period in which it is ceased. It cannot be that a person who manufactures and sells products within the scope of the claims of a patent can be protected simply because that person is lucky enough to have commenced those steps while that patent was not in force through an error or omission of the patentee. There must be a link between the fact that the particular patent has ceased and reliance upon that fact by the person seeking to obtain the protection. Regulation 22.21 of the Regulations does not specifically refer to that necessary link but the regulation can rise no higher than the subsection to which it refers and for which it is prescribed. (emphasis added)

The absence of the qualifying language from the proposed new s 223H means that just such a person as is referred to by Bennett J as being “lucky enough” to have started exploiting, or to have taken definite steps to exploit, the invention concerned will be entitled to continue to exploit the invention, with the added benefit of being able to dispose of that right.

Moreover, such right will commence irrespective of the length of the extension sought and granted by the Commissioner under s 223A with respect to s 223H(1)(a)(ii), i.e. even one month. This represents an unprecedented, and in our view unnecessary, erosion of the rights of a patentee, who may have expended considerable time and money in obtaining patent protection only to lose it to an opportunistic third party by paying the applicable continuation or renewal fee even one day after the period prescribed in r 22.11(3) of the Draft Regulations. In addition, the revised mechanism removes the incentive for a person interested in exploiting an invention to search the register and undertake proper due diligence.

The heading of new s 223H is “Protection of third parties”. This heading picks up on the language of s 223(9) which currently provides for the Patent Regulations to have effect for the “protection and compensation of persons” who fall within the qualifying language referred to above. The natural meaning of the verb “to protect” is “to defend, or guard from attack, invasion, annoyance, insult, etc.; cover or shield from injury or danger”. We submit that “protection”, in its true sense, is afforded to a relevant person by s 223H(7) which precludes infringement proceedings being brought in respect of an infringement committed during the period of extension.

The natural meaning of the word “to compensate” includes “to counterbalance; offset, make up for”, “to make up for something to (a person); recompense” and “to provide or be an equivalent”. These meanings involve a notion of equivalence, counterbalance and equilibrium being restored. The automatic granting of a disposable right to exploit an invention, without limitation (e.g. territory, embodiment, criteria for eligible acquirer), is not an appropriate counterbalance for any loss incurred by a relevant person. An award of pecuniary damages would appropriately compensate any loss caused, or, at the extreme, a personal licence (i.e. non-transferable, non-sublicensable (other than to Related Bodies Corporate) licence belonging only to the relevant person) confined to the particular embodiment of the invention that the relevant person exploited or took definite steps to exploit. See further discussion below under the headings ‘Terms of Licence’ and ‘Scope of Licence’.)

We note the finding in relation to the current s 223(9) and r 22.21 framework that it constitutes:

> “a mechanism whereby the Commissioner formally grants rights to third parties to use an invention, those rights having been (in effect) reserved upon restoration. The grant of those rights is by way of licence - that is, the grant of a right to exploit an invention with immunity from infringement under the relevant patent. Clearly those rights are not monopoly rights that can be exercised against other

---

3 See further discussion under the heading “Terms of Licence” below.
parties (as in the grant of a patent), but nevertheless the licence is the grant of a right by the Commissioner” (emphasis added). 4

These reasons again point to the notion that the “protection” element of the grant of the licence is protection from infringement (as provided in s 223H(7)), and reinforce the compensatory function of the licence and support the argument that the licence should not create a windfall for the relevant person.

We submit that s 223H, if adopted unamended and without the qualifying language, will become a sword that may be taken up by opportunistic third parties who have not suffered any loss or injury from which they need to be protected against or compensated for, rather than used as a shield by persons who genuinely requires protection and compensation which we anticipated was the intention.

For an example of a situation in which an opportunistic third party applied for a licence under s 223(9) and r 22.21, we respectfully refer you to the decision in Garden City Planters Pty Ltd v Vivre Veritas Pty Ltd [2012] APO 133.

Opposition

The repeal of r 22.21(4) and (5), and the absence of any equivalent provisions in s 223H, means that the patentee will not have any opportunity to challenge the legitimacy of a person’s right to exploit an invention under s 223H, except by bringing an action for infringement. This is not a viable option as doing so would expose the patentee to risk of action for unjustified threats under Part 3 of the Patents Act and also provide a convenient forum for the third party to bring a counter-claim for revocation. Further, the patentee will no longer have the benefit of such rights being granted (or not) at the discretion of, and on such reasonable terms as may be determined by, the Commissioner. Nor will the relevant person be required to discharge any burden of proof in order to avail themselves of such rights. 5

The patentee is thus denied any opportunity to preserve its monopoly and to counteract the risk arising from opportunistic third parties that arises under s 223H. In our view this is an unacceptable erosion of the rights of a patentee.

While we see that the proposed new statutory right under s 223H removes uncertainty that exists under the current framework, there may be good and legitimate reasons why it is not just for the relevant person to be allowed to continue to exploit the invention. In our view, the patentee must have an opportunity to challenge the rights acquired by a relevant person under s 223H.

In addition, and in order for the patentee to so challenge, the patentee must be required to be notified of any person exercising, or claiming to exercise, rights under s 223H. 6

Terms of Licence

The licence currently able to be granted by the Commissioner under s 223(9) and r 22.21 has been held to be personal, 7 in the sense that:

- it would belong to the relevant person (e.g. applicant person or company)
- it could be transferred with the business if it changed hands; but it could not be assigned or otherwise transferred;
- the licensee could not sublicense under the licence.

As discussed above, we submit that, a person must only be eligible for relief under s 223H if they exploited or took definite steps to exploit the invention because of the failure to do the relevant act within the time allowed.

If the licence is retained in the Bill, then in order for the licence to represent an appropriate counterbalance to the “loss” of that person, the provisions must be drafted in such a way that reflects the factors currently considered by the Commissioner in determining to grant the licence.

In the first instance, the licence should be personal and not generally transferable or sub-licensable. This reflects the stated intended purpose of the regime provided in ss 223H(2)(d) and 223(3)-(5) as being to

---

4 HRC Project Design Pty Ltd v Orford Pty Ltd (1997) 38 IPR 121.
5 See Garden City Planters Pty Ltd v Vivre Veritas Pty Ltd [2012] APO 133 at [58] for a discussion of the burden of proof under r 22.21 of the Patent Regulations currently.
6 See further discussion under the heading “Noting on Register” below.
7 HRC Project Design Pty Ltd v Orford Pty Ltd (1997) 38 IPR 121, 129 [20].
ensure “that the right to exploit is limited to the person who uses the invention while the patent has lapsed before it is restored, or to the person this right is disposed to”.\(^8\)

While this should be the default position, we submit that the following factors should, in certain limited circumstances, enable departure from that position. These include:

- where the relevant person’s existing group company structure requires inter-company licensing, the licence should be able to be sublicensed to Related Bodies Corporate of the relevant person to allow the continuation of that practice.
- where it can be shown that the relevant person’s exploitation of, or definitive steps taken to exploit, would reasonably require the right to grant sublicences.
- where the relevant person intends to, and does, sell the relevant underlying business as a going concern.

It is necessary to note, however, that an acquirer of the licence at a later date may have a greater impact on the private commercial interests of the patentee than the initial licence (i.e. as held by the relevant person). We submit that such an outcome would be disproportionate to the possible risk of harm to the relevant person arising from that person exploiting, or taking definitive steps to exploit, during the relevant period. That is, there is a risk that the “protection” afforded to the relevant person could significantly prejudice the rights of the patentee and would significantly outweigh any risk of loss that may be incurred by such a relevant person. A relevant person should not be entitled to a windfall arising from the sale of the licence as an independent asset.

We submit that the most efficient way to ensure that the above circumstances are taken into account and properly applied would be to retain the current mechanism whereby the Commissioner has discretion to grant, and to determine the terms and conditions of, the licence in each instance.

**Scope of Licence**

Furthermore, it has been held that the licence may cover the whole patent or be restricted to a particular embodiment of the invention, depending on certain factors, including whether the patent specification contains a number of embodiments of the invention, with a range of preferred options or features, or a single embodiment only.\(^9\)

The restoration under the current s 223 has been held not to be a full restoration of the rights of the patentee but rather (by reason of s.223(9)), a restoration of patent rights other than those rights accrued by third parties who have exploited, or taken definitive steps to exploit, the invention during its period of cessation.\(^10\) We respectfully submit that these two findings go hand in hand. That is, the rights granted to the relevant person must be those that were reserved to them arising from the exploitation of the invention (or steps to exploit) during the relevant period, and such reservation can therefore only extend to the embodiment of the invention actually exploited, or the embodiment in relation to which the relevant person took the definite steps.

That said, by removing the current mechanism providing the Commissioner with discretion to specify the licence terms in each instance, the proposed regime does not provide flexibility to accommodate individual circumstances that may arise in each case. One such circumstance may be where the extension of time enables the patentee to file a divisional application or a patent of addition. The drafting of the proposed regime provides for the person to “exploit the invention concerned”, and it is not clear whether that form of words would enable the licence to accommodate such further filings.

Again, it is submitted that a regime that allows each case to be assessed individually is preferred to a “one-size-fits-all” approach, such as that set out in s 223H."

**Recording and Notice of Rights under s 223H**

We note that, under the current mechanism of s 223(9) and r 22.21, the Commissioner is required to note a licence to exploit the invention that is granted in the relevant part of the Register under s 187 and r 19.1.\(^11\) This means that any third party acquirer or other interested party who searches the Register

---

9 HRC Project Design Pty Ltd v Orford Pty Ltd (1997) 38 IPR 121, 128 – 129.
10 HRC Project Design Pty Ltd v Orford Pty Ltd (1997) 38 IPR 121, 128.
11 Ibid.
will be on notice of such licence, which is essential for due diligence purposes. There is no such requirement in the proposed s 223H or r 22.11 for a relevant person to record their entitlement under that section on the Register, nor to provide the patentee with notice of same.

We submit that this omission will cause havoc in the due diligence phase of any transaction involving a patent, as the Register will no longer record all interests in, claims to, or encumbrances on a patent.

In addition, notification to the patentee will be necessary to enable the patentee to challenge the legitimacy of a relevant person’s entitlement to exploit the invention, as discussed above.

Trade Marks: Extensions of Time and Acceptance

We refer to the statement that “Australia has one of the longest acceptance times in the world” in the explanatory memorandum to the Draft Regulations. In our experience, other IP offices require a response to an Examination Report or Office Action before a particular date, but do not require that all objections be overcome by that date. Those IP offices instead issue further Examination Reports or Office Actions as appropriate which have new deadlines. As a result, the overall period for acceptance could be longer than 15 months, depending on the number of Examination Reports or Office Actions issued against an application. In addition, IP offices in some jurisdictions (for example, Indonesia) take up to two years to examine an application. In our view, the current 15 month period for acceptance of a trade mark following the issue of an Examination Report is appropriate and should be preserved as it provides time for applicants to gather, collate and file evidence and submissions in response to an Examination Report, as well as for further rounds of correspondence with IP Australia and the gathering of further evidence and drafting of further submissions as required.

We submit that the simultaneous shortening of the period of acceptance for a trade mark from 15 months to 9 months coupled with the removal of the ability for the applicant to apply for 6 one month “easy” extensions will place an undue burden on applicants and trade mark professionals, as well as on IP Australia, and risks prejudicing the ability of applicants to overcome all IP Australia objections within that period (See items 421, 423 – 425 of the Draft Regulations). The administrative burden on IP Australia will increase if the period of acceptance is shortened from 15 to 9 months as each Examiner will be required to quickly process and respond to any response filed in answer to an Examination Report, or Further Examination Report, in order to ensure that an applicant has sufficient time to respond to any further issues raised by IP Australia.

We note that IP Australia already requires applicants to file any response to an Examination Report at least 20 Business Days before the final date for acceptance, despite there not being any legislative basis for such requirement. Therefore in practice, the current period for acceptance is effectively 14, and not 15, months.

While the grounds on which an applicant may seek deferral of acceptance of an application are proposed to be expanded to include gathering evidence to overcome objections raised under ss 41 and 177 of the Trade Marks Act (see item 427 of the Draft Regulations), in our view this expansion will not be sufficient to mitigate the possible prejudice to applicants referred to above. While the ability to defer the acceptance of an application is described on IP Australia’s website and in the Trade Marks Office Manual of Practice and Procedure, it is not currently referred to in, nor to our knowledge has it ever been referred to in, Examination Reports issued by IP Australia on the basis of s 44. As such, we submit that the majority of applicants would not be aware of the ability to defer. This mechanism, unless it is extensively publicised and promoted by IP Australia to prospective applicants, is unlikely to ameliorate the potential prejudice to applicants arising from the shortening of the acceptance period from 15 to 9 months and the removal of the ability to apply for “easy” extensions.

We further note that the likely practical consequence of implementing the proposed changes would be for trade mark professionals (and possibly also individual applicants) applying for deferrals of acceptance as a matter of course upon the receipt of an examination report issued on the grounds of ss 41, 44 and 177 of the Trade Marks Act. The effect of obtaining such deferral would be to extend the period for acceptance to 15 months in any event (9 months plus 6 month deferral period). This would increase

---

the administrative burden imposed on IP Australia regarding the period for acceptance of applications, as each such application for deferment would require processing.

In summary, we submit that the period of acceptance of a trade mark should be preserved as 15 months, and not shortened to 9 months, and the ability to obtain 6 one month “easy” extensions should also be preserved. If IP Australia considers that it is inappropriate for reasons of market uncertainty to preserve both these items in their current form, we submit that the number of one month “easy” extensions available to an applicant could be reduced, but that the ability to apply for such extensions should not be removed.

**Trade Marks: Unjustified threats**

While we similarly see the benefit of introducing the concept of additional damages as set out in item 484 of the Bill, we are concerned that its introduction, when coupled with the repeal of s 129(5) as proposed in item 485 and the absence of a provision equivalent to s 131 of the *Patents Act 1990* (Cth), could increase the exposure of owners to actions for unjustified threats, and discourage owners from enforcing, or even providing notice of, their rights under the Trade Marks Act.

Part 15 of the Bill does not include an equivalent amendment to the Trade Marks Act as that set out in item 481 (s 57D) in the context of the *Plant Breeders Rights Act 1994* (Cth), pursuant to which mere notification of the existence of PBR in a plant variety is deemed not to constitute an unjustified threat (akin to s 131 of the *Patents Act 1990* (Cth)). In respect of that amendment, the draft Explanatory Memorandum refers to the “perverse situation” of it being in an owner’s best interest to not inform other parties about its PBR rights in order to avoid possible actions for unjustified threats. That “perverse situation” presently exists under the Trade Marks Act in the absence of an equivalent provision, and must be addressed.

Firstly, we submit that a provision equivalent to that set out in item 481 (s 57D) in respect of the *Plant Breeder’s Rights Act 1994* (Cth) should be included in the Trade Marks Act.

Secondly, we note that s 129(5) is proposed to be deleted to bring the relevant provisions of the Trade Marks Act into line with changes made to patent law in 1952, which are discussed by Dowsett J in *CQMS Pty Ltd v Bradken Resources Pty Limited* [2016] FCA 847 (27 July 2016) (*CQMS Case*), and to that extent the removal of that provision seems appropriate.

However, we submit that the unjustified threats regime requires extensive review across all relevant legislation, including in the *Patents Act 1990* (Cth) and the Trade Marks Act. That is, a middle ground must be struck in the legislation between s 129(5) and the current position taken by the courts in applying the unjustified threats provisions, as seen in the CQMS Case when Dowsett J arrived at the finding “My conclusion that there has been no infringement means that the threats were unjustified”. This finding shows that the balance of unjustified threats provisions is unfairly skewed towards the person to whom the threats have allegedly been made, and that those provisions would act as a deterrent to a rights holder taking steps to enforce their relevant rights. This is particularly so in light of the tension between the unjustified threats provisions and a patentee’s obligations under the *Civil Dispute Resolution Act 2011* (Cth) (*Dispute Resolution Act*) to take genuine steps to resolve a dispute in advance of litigation. This tension is considered by Dowsett J in the CQMS Case, in whose opinion “[i]t is at least possible that genuine steps taken in anticipation of the commencement of infringement proceedings, may constitute threats of such proceedings”. His Honour found further that:

> It may be necessary, in proceedings in which unjustified threats are alleged, that the Court distinguish between genuine steps to resolve a dispute and threats of infringement proceedings. Further, particular conduct may be both a genuine step and a threat. The Court may have to decide whether such a threat is actionable, having regard to the policy and effect of the Dispute Resolution Act.

---

15 *CQMS Pty Ltd v Bradken Resources Pty Limited* [2016] FCA 847 (27 July 2016), [176].
16 Ibid, [159].
17 Ibid, [181].
18 Ibid, [182].
However, in that case, His Honour confined himself to distinguishing whether certain conduct of the patentee constituted a genuine step or a threat, but not whether such conduct could be characterised as both, nor whether, in light of that finding, such threat was actionable.

We submit that the unjustified threats provisions should be amended to allow a court to apply certain prescribed indicia to determine whether a threat is “actionable”. This would resolve the tension between a rights holder’s obligations under the Dispute Resolution Act and the unjustified threats provisions, constitute a middle ground between s 129(5) and the position currently adopted by the courts in applying those provisions, and avoid the perverse situation which is identified in the Explanatory Memorandum.  

**Trade Marks: Other Matters**

The following submissions are ordered in the sequence in which the relevant items appear in the Exposure Drafts.

(i) We see the benefit of introducing item 167 (s 224(2)(f)) of the Bill and item 136 of the Draft Regulations which sets the time period for filing an extension of time application to 2 months after the applicant becomes aware of the error or omission, or special circumstances, or after the circumstances beyond a party’s control that prevented the relevant act occurring have ceased to exist.

(ii) We query the benefit of requiring that extensions for less than three months are published and able to be “objected to” within one month. We submit that any benefit is outweighed by the likely inconvenience, logistical issues and complications that will ensue.

(iii) We query why the terminology of “object” and “objections” is used in item 167 of the Bill within s 224B instead of the usual terminology of “oppose” and “opposition”, particularly as that usual terminology is used in the equivalent provision in s 224C. In our view the use of the terminology “object” and “objection” in s 224B, and the inconsistency its usage creates with s 224C, will give rise to confusion.

(iv) We query why s 224B does not contain a provision corresponding to 224C(3), and 224C does not contain a provision corresponding provision to 224B(3). We also query why both ss 224C(4) and (6) are necessary in their current form, and respectfully suggest that some additional language regarding the outcome of the subject opposition proceedings may have been omitted from s 224C(6).

(v) We query various amendments set out in Part 4 of the Bill. The first query relates to the deletion of “in writing” (see item 267). Under s 9 of the *Electronic Transactions Act 1999* (Cth), a requirement to give information in writing is satisfied if the information is given by means of electronic communication, and “giving information” is defined inclusively to include giving, sending or serving a notification, among other things. In our view the requirement for the Registrar to give information or do things in writing is not “unnecessary”. On the contrary, it is essential from an evidentiary point of view. In our view, even with an eye to new communication technologies that may be developed in the future, all such notices are likely to, and should still, be in writing in some form, such as electronically and communicated via software platforms.

It is essential from an evidentiary point of view that applicants and trade mark professionals are able to receive communications from IP Australia that create a definitive record and not left open to misinterpretation, and that can be traced and proven to have been given and received. In our view, the proposed s 214A in item 276 of the Bill could encompass the Registrar notifying a person verbally (such as in person or by telephone) or by other transient means, and goes further than it needs to in order to achieve the stated outcome of providing the Registrar with “flexibility into the future as modern communication technology develops”. We recommend that all such communications be in writing, or otherwise be by means of communication that create a definitive record and are “traceable”. In addition, a further subsection could be included which requires the

---

20 Electronic Transactions Act 1999 (Cth).
22 Ibid.
Registrar to retain a record of each such communication, a copy of which must be provided to the applicant (or their agent) upon request, or otherwise in answer to a subpoena or FOI request.

We consider the proposed changes in Part 4 of the Bill to be unhelpful and unnecessary.

(vi) We also query whether the change proposed by item 273 of the Bill would place a more restrictive, rather than a more flexible, obligation on IP Australia, contrary to the stated intent in the draft Explanatory Memorandum.23

(vii) We query how, in a practical sense, applicants and trade mark professionals will be made aware of notices published in accordance with section 230A, for example those required to be issued under, and described in, items 312 and 313 of the Bill and other like amendments. For instance, whether such directions will be communicated via eServices or a similar platform, or whether it will be the responsibility of each applicant and trade mark professional to routinely check for such notices (e.g. on IP Australia’s website).

(viii) In relation to item 312 of the Draft Regulations, we query whether it is feasible to rely on applicants obtaining extensions of time under s 224 as referred to in the explanatory memorandum.24 While we presume that acceptance and publication of acceptance will happen on the same day, we query whether IP Australia can guarantee that this will occur. As opposition and other deadlines begin to run from the relevant date, we query why this would not still be publication of acceptance, but on the website rather than in the Official Journal. This would avoid the need for an applicant to apply for an extension under s 224 in the event of a delay between acceptance and publication of same by IP Australia. We anticipate that the date of “publication of acceptance” data could be easily pulled through into the trade mark record (i.e. date of posting on ATMOS or equivalent).

(ix) We endorse the change of terminology proposed in item 485 of the Bill to “unjustified threats” from “groundless threats” for consistency with other relevant legislation.

Concluding Remarks

We would be happy to discuss any of the above matters with you should that assist IP Australia in finalising the Bill and Draft Regulations. In the meantime, we thank you for the opportunity to provide these submissions.

Yours faithfully,

Jeff Bergmann, CLP, LLM, BSc
Director
Solubility Pty Ltd
+61 (0)437 667 288
jeff.bergmann@solubility.com.au
solubility.com.au

Madeleine Crawford, LLM (IP), LLB
Senior Associate
Solubility Pty Ltd
+61 (0)439 689 199
madeleine.crawford@solubility.com.au
solubility.com.au