



Animal Health Alliance
SOLUTIONS FOR THE FUTURE

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Committee Secretary
House of Representatives Standing Committee on
Agriculture, Resources, Fisheries and Forestry
PO Box 6021
Parliament House
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AUSTRALIA

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Agricultural and Veterinary Chemicals Legislation Amendment Bill 2012
– Animal Health Alliance (Australia) Ltd Submission

The Animal Health Alliance (Australia) Ltd (the Alliance) is the voice of the animal health industry in Australia. It represents registrants, manufacturers and formulators of animal health products. The association's member companies represent in excess of 85 per cent of all animal health product sales in Australia (ex factory gate). The Alliance manages both national and state issues with the objective of ensuring its members can operate within a viable regulatory environment. The Alliance also contributes to sustainable industry risk reduction practices that provide business opportunities to members and add value to the broader Australian community.

The Alliance welcomes the opportunity to offer a submission to the House of Representatives Standing Committee inquiry into the Agricultural and Veterinary Chemicals Legislation Amendment Bill 2012.

The new legislation underpins the future operation and efficiency of the national regulator of veterinary chemical products in Australia – the Australian Pesticides and Veterinary Medicines Authority (APVMA).

The APVMA is the primary regulator that the Alliance member companies have to engage with to obtain product registration along with label and active constituent approvals before their products can be legally sold in Australia.

The Alliance has been actively engaged with APVMA, Department of Agriculture, Fisheries and Forestry (DAFF) along with Federal and State governments since 2006 seeking fundamental changes to the APVMA, regulations plus operational guidances and processes so to overcome inherent inefficiencies in delivery of services to the animal health industry in Australia.

Please find attached a copy of a suite of submissions supplied by the Alliance over the recent years highlighting the inherent problem with APVMA and offering solutions.

This latest attempt by government to deal with APVMA inefficiencies through the Agricultural and Veterinary Chemicals Legislation Amendments Bill 2012, does not, in the Alliance's opinion, do anything to address the fundamental problem. In fact this new Bill actually increases the regulatory burden on industry and imposes more work for the APVMA without any demonstratable cost/risk benefit to warrant such a move.

The new Bill adds over 200 new pages of legislation for APVMA to administer and it removes none from the existing legislation. An additional cost of approximately AUS \$8 million is likely to be imposed on the agvet chemical industry to implement this Bill in its first year of operation.

The Alliance finds it extremely frustrating that the present Federal Government espouses its platform of reducing regulatory compliance costs on businesses and then tables this Bill.

The Alliance and its member companies are not averse to good regulation and are prepared to pay for an efficient and effective regulatory system. This present Bill however has not demonstrated a market failure with the present regulation of veterinary chemical products that warrant this new legislation. In addition, this proposed new Bill has not been presented from a cost/risk benefit basis. In fact, the Exposure Draft preceding this draft Bill offered no examples from overseas regulators where similar proposed regulatory changes as those in the draft Bill, have been implemented and are needed for veterinary chemical product regulation. All the evidence offered in the Exposure Draft relates specifically to agricultural (crop) chemical products.

The Alliance has been active over the last years in attempting to highlight to Government and DAFF, while drafting the new Bill, the flaws and impediments in the proposed new processes intended to operate to deliver this new Bill. The Alliance has issued a series of media releases in an attempt to highlight the problem and also solutions. (See attachments).

If you have any enquiries regarding the Alliance submission please contact me on 02 6257 9022

Yours sincerely

Dr Peter Holdsworth AM FAICD
Chief Executive Officer

Animal Health Alliance (Australia) Ltd