



Department of  
**Primary Industries and  
Regional Development**

Our reference: A3611515

Senate Rural and Regional Affairs and Transport Legislation Committee  
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Dear Members of the Committee

**INQUIRY INTO THE AGRICULTURAL AND VETERINARY CHEMICALS  
LEGISLATION AMENDMENT (STREAMLINING REGULATION) BILL 2018**

Thank you for the opportunity to make a submission to the inquiry regarding the Agricultural and Veterinary Chemicals Legislation Amendment (Streamlining Regulation) Bill 2018 (the Bill).

The Department of Primary Industries and Regional Development (the Department) plays an important role in ensuring that Western Australia's (WA) primary industries create jobs, economic growth and diversification for the State. The Department is a partner in the National Registration Scheme for Agricultural and Veterinary Chemicals and relies on the independent regulatory decision making of the Australian Pesticides and Veterinary Medicines Authority.

WA has a reputation for producing safe, quality food and regulation of agricultural and veterinary chemicals (agvet chemicals) plays an important role in protecting this reputation.

WA supports well designed regulation that enhances productivity, investment, jobs and growth whilst reducing unnecessary regulatory burden.

The proposed regulations are supported with one note of caution. The Bill provides for a legislative instrument to prescribe a scheme that would allow applicants (chemical companies) to use accredited third party providers to undertake assessment services.

The APVMA has used independent assessors under contract for many years, usually for a particular assessment/task. These independent assessors have been able to extend the technical ability of the APVMA whilst maintaining independence of the registrant.

Allowing chemical companies to pay accredited third party providers to undertake assessment services directly on their behalf could lead to a real or perceived conflict of interest. Although I note the APVMA plans to audit third party providers to ensure the integrity of assessments there is a risk to the credibility and reputation of the registration process. Thorough consideration of this issue and the implementation of robust mechanisms to manage this risk are essential. Public confidence in the independent decision making of the APVMA must not be undermined.

I look forward to receiving a copy of the Senate Committee's report when finalised.

Yours sincerely

Ralph Addis  
**DIRECTOR GENERAL**

*20/12/2018*