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AgForce submission

***Agricultural and Veterinary Chemicals
Legislation Amendment (Removing
Re-approval and Re-registration) Bill 2014***



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SUMMARY

AgForce Queensland supports the *Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Bill 2014* (the Bill) and recommends the Bill be passed by the Commonwealth Parliament. Previous extensive consultation by the Federal Department of Agriculture on the Bill's exposure draft is enabling effective, timely reform of agvet chemical regulations. Ideally if the Bill is passed before the 1st July 2014, the Agvet Code introduced by the previous government would not trigger costly implementation of periodic re-registration. AgForce Queensland commends the Federal Government for introducing a range of agvet chemical reforms which will reduce red tape and improve the efficiency of the trusted regulatory body, the Australian Pesticide and Veterinary Medicines Authority (APVMA).

BACKGROUND

AgForce is the peak lobby group representing the majority of beef, sheep and wool, and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$4.5 billion in gross farm-gate value of production in 2012/13. AgForce exists to ensure the long term growth, viability, competitiveness and profitability of these industries. Our members provide high quality food and fibre products to Australian and overseas consumers, manage more than 50% of the Queensland landscape and contribute significantly to the social fabric of rural and remote communities

The impact and costs of weed, pest and disease management are an ongoing, major concern to primary producers. CropLife Australia estimates \$2.5 billion was spent on 4427 registered crop protection products used across Australia during 2011 to 2012¹. 46% of these crop protection products are used in broadacre agriculture¹. In 2013, AgForce surveyed 176 broadacre producers across Queensland. The average annual expenditure on weed management is \$44 400 per year with \$8 600 (20%) of these costs for herbicide purchases and 50% of costs is labour.

Australian producers are renowned for the production of safe food and fibre and protecting natural resources from pest and weed invasion. It is essential that producers have access to a range of cost-effective and safe pesticides to manage and prevent pest and weed invasions and control disease infections in animals and crops. A range of pesticides with different modes of action need to be available for managing new issues such as herbicide resistance in crop and pasture weeds, tick and buffalo fly resistance. Although pesticide safety and efficacy are most important, agvet regulations need to provide a simplified pesticide registration system to ensure agrichemical companies, registrants and others will continue to market a range of effective pesticides within Australia. Producers rely on efficient minor use and emergency permit systems to rapidly respond to new pest incursions and additional uses of pesticides, beyond current prescribed labels. The Bill ensures agvet chemical regulation reform is effective, streamlined and supports agricultural production.

Responses to Amendments

¹ CropLife Australia, 2013. *Economic activity attributable to crop protection products*. Deloitte Access Economics.

Election commitment

AgForce endorses the Australian Government election commitment:-

- To streamline the agvet chemicals registration process;
- Link to relevant overseas data on chemical efficacy and safety; and
- Improve the minor use permit system for rapid and flexible management of new pest incursions, minor uses and specialty crops.
- Improve APVMA's power to trigger reconsideration where new safety, efficacy or trade risks are identified for any agvet chemical. This includes the ability to recall unsafe products. New risks need to be validated, according to the specified criteria clearly outlined in the Regulations and not as a response to misinformed or unfounded community hysteria.
- Help reduce input costs to agriculture by developing a streamlined, efficient pesticide regulation system. Agvet chemicals are an essential tool for food and fibre production, animal health, protecting biodiversity and managing natural resources. CropLife Australia estimated mandatory re-registration, if introduced post July 2014, would cost chemical registrants \$6.75 million per annum². These additional costs would have been passed onto producers and other end-users.

Schedule 1 Amendments

a Remove re-registration

AgForce supports the removal of mandatory re-registration for all 11,700³ agvet chemical products on a seven to fifteen year cycle. Registration of safe, effective chemicals should remain in perpetuity. APVMA can reconsider registration of any pesticide where new, scientifically validated information identifies potential risks to safety, efficacy or trade

b Retain provision to renew or re-approve registration of agvet chemicals

AgForce considers the provision to renew or re-approve registration of an agvet chemical product needs to be retained in special circumstances. In the future, access to a previously registered, safe product may be needed when combating issues such as pesticide or pest resistance or new incursions of high risk pests. Active constituents or products which were previously registered in Australia and now only available from overseas countries may need to be considered for a rapid response to a new pest such as an outbreak of an exotic, high-risk animal health disease. Pesticide risk-based frameworks used by APVMA would ensure the use and situation are stipulated on the label and/or minor use permit, so any perverse impacts would be minimised. New science and application technology may result in previously registered chemicals being reconsidered safe and efficient to use again. This provision would also enable end-users to access lapsed agvet products which registrants no longer market in Australia, due to previous limited income and small market use.

² <http://www.croplifeaustralia.org.au/wp-content/uploads/2011/02/CropLife-Better-Regulation-Costs-Supp-Sub-Final.pdf>

³ Explanatory Memorandum 2014 – Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-Approval and Re-Registration) Bill 2014. House of Representatives, Australian Parliament.

Schedule 2 Amendments

c. Addressing concerns with chemical product quality

Quality assurance of agvet chemical products in the marketplace is very important to end-user producers. This applies to imported products manufactured overseas and products manufactured in Australia. The concentration of the active constituent, quality of product surfactants/carriers and no unknown contaminants need to be subject to random information checks and chemical analysis tests for quality assurance. AgForce totally supports APVMA having the capacity and resources to test quality of any agvet chemical products at any stage of the supply chain. APVMA should have the authority to request information and samples by written notice and also by random audits.

d. Reducing red tape by allowing for simpler variations to approvals and registrations

AgForce agrees that the process for simple, notifiable and prescribed variations to registered products should be streamlined and minimise costs for all parties. This would enable registrants to respond to market needs, packaging and manufacturing efficiencies. Simplified processes for variations would increase technical efficiencies and help manage limited resources within APVMA.

Conclusion

Australia has an international reputation for the production for safe, clean food and fibre. APVMA plays an important role in this reputation by overseeing the registration, usage and withholding periods of agvet chemicals used on crops, pastures, animals and natural resource areas. AgForce supports the *Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Bill 2014* and appreciates the previous extensive departmental consultation for true reform and improved efficiencies within agvet chemical regulation. Passing of this Bill will effectively remove unnecessary red tape and provide opportunities for chemical registrants to develop and market a range of safe agvet chemicals in Australia. Removal of unnecessary regulation through passing the Bill will also improve efficiency and timely responses of APVMA pesticide regulation processes.

Thank you for the opportunity to provide a submission to the Bill.