



10 October 2019

Committee Secretary
Senate Rural and Regional Affairs and Transport Legislation Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Submission to Inquiry into Agricultural and Veterinary Chemicals Legislation Amendment (Australian Pesticides and Veterinary Medicines Authority Board and Other Improvements) Bill 2019 [Provisions]

AgriFutures Australia welcomes the opportunity to put forward a submission to the Rural and Regional Affairs and Transport Legislation Committee regarding the inquiry into the Agricultural and Veterinary Chemicals Legislation Amendment Bill 2019.

We note the Committee's renewed consideration of the Bill which we understand seeks to improve the effectiveness and efficiency of the national system for regulating agricultural and veterinary (agvet) chemical products. AgriFutures does not wish to make specific comments against each of the issues identified in the Bill, but would like to voice our support as we believe the changes, where relevant to our specific industries, will help deliver a more effective and efficient national system for agvet chemicals.

AgriFutures is responsible for enhancing the profitability and sustainability for a number of levied rural industries, including Rice, Chicken Meat and Export Fodder, as well as smaller levied industries, including Ginger, Tea Tree Oil, Pasture Seeds and Kangaroos. In addition to levied industries, we also support new and emerging industries, such as Kakadu Plum, Camel Milk and Quinoa. AgriFutures has also been the auspicing agency for the AgChem Priority Access Forum, a three-year collaboration between plant based Rural Research and Development Corporations (and Dairy Australia) and CropLife Australia.

AgriFutures' industries have greatly benefited from projects funded through the Australian Government's Improved Access to Agricultural Veterinary Chemicals Initiative. Market failure associated with minor use chemical registration is a key inhibitor of growth for many of AgriFutures' industries. In particular, costs associated with generating the data required for obtaining and maintaining regulatory approval are, in many cases, prohibitive for small industries. Funding through this initiative has been key to obtaining data and submitting approvals to the Australian Pesticides and Veterinary Medicines Authority (APVMA) for chemical registrations to address priority pest and disease issues.



In this context, AgriFutures supports any opportunity to streamline the application and approvals process for chemical registrations through the APVMA and improve the effectiveness of the regulatory system.

In particular, AgriFutures strongly agrees with the following statements in relation to the new Bill, that it will :

- provide the APVMA and industry with more flexibility to deal with certain types of new information (provided when the APVMA is considering an application)
- enable the use of new, simpler regulatory processes for chemicals of low regulatory concern, to simplify the approval of active constituents and labels, and the registration of certain products
- provide for extensions to limitation periods and protection periods as an incentive for chemical companies to register certain new uses of chemical products—particularly those uses (minor uses) with insufficient commercial return for chemical companies to normally add to the product label
- reduce the administrative burden on the APVMA and industry by increasing the flexibility of the APVMA to manage errors in an application at the preliminary assessment stage.

We also agree that it will:

- provide the APVMA with more comprehensive grounds for suspending or cancelling approvals or registrations where information is provided in a variation application that is false or misleading
- make minor and machinery changes including removal of unnecessary and redundant provisions and other changes to realise operational efficiencies, reduce unnecessary regulation and clarify ambiguities.

Should the Committee require any further information or clarification on our support for the Bill raised in the submission, please contact me by email at

Yours sincerely

Michael Beer
General Manager, Business Development
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