



**Feed Ingredients and Additives Association of Australia Inc**

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Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and Transport  
P O Box 6100  
Canberra ACT 2600  
Via email- [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)  
Dear Sir

5 February 2013

Our Association is a relatively new industry body formed to represent the interests of feed ingredient suppliers with a key endeavour to ensure the supply of safe feed to the Australian livestock industry.

We have been actively involved with both the DAFF and APVMA, the latter of which our Association recently joined their Industry Liaison Committee. The AgVet reform initiatives have been of key interest especially to ensure that many of our members low risk products are suitably addressed to ensure a streamlined and economical registration process.

We have been liaising with most of our major industry stakeholders including Stockfeed Manufacturers Council, Pet Food Industry Association, Chicken Meat Council, Australian Pork Ltd, Dairy industry, Cattle Council, Australian Lot Feeders, Australian Egg Corp, Sheep Meat Council, Equine Industry & Aust Food & Grocery Council. We estimate these industries contribute \$18.4B to the Australian economy and employ in excess of 72000 Australians.

Our investigations have revealed that two important areas of AgVet regulation are outmoded and require both immediate review and an ongoing process to ensure they can be kept up to date in future. These are the Stockfeed Non-Active Constituents Order, a Ministerial Order dating from 1995<sup>i</sup> and the nutritional references currently used as the basis for determining nutritional inclusions and therefore the levels required for nutrition and not as veterinary medicines<sup>ii</sup>.

The current SNAC list is now 17 years old, and we contend that this along with the nutritional guidelines must be updated at least biannually to ensure they reflect contemporary and practical standards used by industry. The risk of not updating the lists, are that our industry may inadvertently be in contravention of out-dated legal requirements, and we become un-competitive in today's rapidly changing global business environment.

We suggest that both documents be updated using a specialist professional panel representing animal production academia, industry, and government responsible to APVMA and DAFF, and the output be authorized by an appropriate delegate such as the APVMA CEO rather than as a Ministerial Order or imbedded in Regulations.

While these matters are not directly part of the current Reforms they are implicated and require immediate attention. We seek your guidance in addressing these issues.

Yours faithfully

John Aird, Executive Manager

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1. <sup>i</sup> (see [http://www.comlaw.gov.au/ComLaw/Legislation/LegislativeInstrument1.nsf/0/2CBB9A3E333B2DD6CA25756F0017A40B/\\$file/StockfoodOrder.pdf](http://www.comlaw.gov.au/ComLaw/Legislation/LegislativeInstrument1.nsf/0/2CBB9A3E333B2DD6CA25756F0017A40B/$file/StockfoodOrder.pdf))

2. <sup>ii</sup> (see [http://www.apvma.gov.au/publications/guidelines/q17\\_stockfeed.php](http://www.apvma.gov.au/publications/guidelines/q17_stockfeed.php) and also <http://www.comlaw.gov.au/Details/F2011C00163> page 114, Schedule 3AA).