



Department of  
**Agriculture, Fisheries  
and Forestry**

Reference: CTS07034/14

16 APR 2014

Mr Tom Watling  
Committee Secretary  
Senate Rural and Regional Affairs and Transport Legislation Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Mr Watling

Thank you for your email of 21 March 2014 concerning the inquiry into the Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Bill 2014 (the Bill).

Queensland notes the main objective of the Bill is intended to amend the *Agricultural and Veterinary Chemicals Code Act 1994* to implement reforms to remove the requirement for agricultural chemicals and veterinary medicines (together, agvet chemicals) re-registration by removing end dates for approvals and last renewal dates for registrations so that approvals will no longer end after a particular period and registrations may be renewed perpetually, and removing redundant provisions that allow applications to re-approve and re-register active constituents and chemical products.

It is also noted that the Bill also intends to introduce reforms that:

- reduce red tape by providing for less frequent registration renewals
- improve the Australian Pesticides and Veterinary Medicines Authority (APVMA) ability to secure information about the safety of chemicals supplied in the market
- oblige the APVMA to provide access to information about approvals and registrations in its files to persons eligible to receive it
- address some minor implementation issues identified in existing reform legislation.

The Queensland Department of Agriculture, Fisheries and Forestry has been concerned that the resources given to the APVMA were not sufficient to administer the re-approval and re-registration scheme and that there remained a lack of clarity about when a product or active constituent would not pass the criteria and be referred to chemical review.

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The general concept of a re-registration and re-approval has merit and is utilised by many overseas regulators as a way of ensuring that agvet chemicals have been approved by modern risk assessment principles. In Australia, there are a large number of uses of agvet chemical products that were approved by the registration systems of the States and Territories, prior to the formation of the APVMA that have not been reassessed by modern risk assessment principles.

One of the great promises of national registration was that the 'grandfathered' products would be reassessed. There has been limited progress in reassessing the uses of these products under the APVMA Chemical Review program. This should not necessarily be taken as a criticism of the APVMA but more a reflection of the complexity of reviewing agvet chemicals and the inherent resource issues of a country with a similar number of products to our overseas counterparts but with much lower Gross Domestic Product.

At a practical level, it is considered that the re-registration and re-approval scheme was unlikely to have achieved its aim so the amendment to remove references to re-approval and re-registration in the legislation is supported.

The concept of less frequent renewal of registrations is attractive as an obvious administrative efficiency for both the registrants and the APVMA.

Queensland considers that it is essential for the APVMA to be able to effectively administer the scheme and ensure that agricultural and veterinary chemical products comply with the details provided under the original application and those required as a condition of registration. Accordingly the proposed amendments to address concerns with product quality issues are supported.

The amendments relating to simplification to approvals and registration, access to information held by the APVMA would clearly reduce red tape and improve efficiency enabling the APVMA to focus on core business. These amendments are also supported.

Yours sincerely

**Dr Beth Woods**  
**Acting Director-General**  
**Department of Agriculture, Fisheries and Forestry**