

# *Tasmanian Agricultural Productivity Group Ltd*

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Committee Secretary  
Senate Standing Committees on Rural & Regional Affairs & Transport  
POBox6100  
Parliament House  
Canberra. ACT 2600

Reference: Agricultural & Veterinary Chemicals Legislation Amendment Bill

## **1. Introduction:**

TAPG represents the processing side of the agricultural industry in Tasmania. It is a registered “not for profit” company with ASIC. Our main purpose is to represent the views of our members with in agricultural policy debate at both State and National level. To this end we have been engaged in responding to the Federal Government’s “Better Regulation of Agricultural and Veterinary Chemicals” program of reform. Our earlier submissions and engagement in workshops and briefings has been comprehensive.

Membership of our response team has been consistent over the several years of this engagement and the individuals are well versed in the history of the consultation. They represent a diverse range of industry leaders with personal expertise in dealing with agricultural chemicals and include:

- A representative from plantation forestry.
- A representative from the poppy growers association.
- A representative from a specialised crop protection company.
- A representative from a specialised agricultural advisory company.

This expert team also receive additional advice from a University Agricultural Research Academic and a number of field based practitioners who are themselves vastly experienced in relevant chemical usage.

## **2. Executive Summary: “Right problem, wrong solution!”**

The disconnect between the Government’s stated goals and the actual outcomes of the proposed regulatory reform is significant. While there is no failure in the efficacy of the current system, all sectors of the agricultural industry have argued that it is an inefficient and time intensive process. The reforms as proposed will only increase this problem resulting in farmers paying more for crop protection products, reduce access to existing chemistry and discourage new, innovative, crop protection products being brought to the Australian market.

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The bill introduces “additional” administrative procedures within an already over complex process that will reduce certainty for applicants, increase the complexity of the approval process and restrict innovation.

### **3. Reform Deficiencies:**

- Increases costs for registrants and applicants.
- Removes flexibility for applicants and the regulator.
- Will result in loss of existing products and discourage/delay introduction of new products.
- Does not increase efficiency or reduce red tape.
- Ignores significant potential areas of reform.

### **4. The Consultation Process:**

- The contents of the RIS do not reflect the provisions of the exposure draft which makes analysis by stakeholders excessively difficult.
- Has not provided any quantitative cost/benefit assessment relevant to any stakeholder including the government itself!
- Failed to produce a comprehensive risk framework document necessary to underpin efficiency measures.
- Proposed commencement dates mitigate against the development of the risk framework mentioned previously.

### **5. Conclusion:**

Our group acknowledge and strongly endorse the work of “Crop Life Australia” in providing a detailed response to this matter. Their analysis has informed our own discussions and is reflected in the key points detailed above.

As always we remain available to discuss these critical issues in any forum at your convenience.

Kind regards

Jim Wilson  
Chairman  
TAPG  
19/12/2012

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