



Advancing Australian Cotton

13 November 2018

**Submission to the Senate Standing Committees on Rural and Regional Affairs and Transport on the
independence of regulatory decisions made by the Australian Pesticides
and Veterinary Medicines Authority (APVMA)**

Dear Committee Secretary,

Introduction

Cotton Australia is the key representative body for Australia's cotton growing industry supporting more than 1200 cotton producers. The cotton industry is an integral part of the Australian economy, worth more than \$2 billion per-annum in export earnings and helping to underpin more than 50 rural communities.

Crop protection technologies are essential tools for the cotton industry and Australian cotton growers are recognised as world leaders in effective stewardship of these crop production technologies to enable sustainable cotton production.

The APVMA is recognised globally as a world leading independent, science-based regulator. While Cotton Australia believes there is no basis for an inquiry into the independence of the APVMA, we welcome the opportunity to participate in any process that leads to increased awareness of the importance of agricultural innovations to the Australian agricultural industry.

Responsiveness and effectiveness of the APVMA's process for reviewing and reassessing the safety of agricultural chemicals in Australia, including glyphosate, and how this compares with equivalent international regulators

The safety of agricultural chemicals for users, communities, consumers and the environment must be of the highest priority. Regulatory decisions must be made independently, using rigorous scientific methods, to ensure the safety of the community, animals and the environment. The APVMA is globally recognised as a world leading regulator that makes decisions based on science. In respect to glyphosate, the debate in the media, and in the community that has followed, has not been based on scientific evidence. Numerous comprehensive independent reviews and regulatory safety assessments by government agencies and regulators globally have all reached the same conclusion, that glyphosate weed control products are safe and there is no evidence they cause cancer when used under correct label directions.

The roles and responsibilities of relevant departments and agencies of Commonwealth, state and territory governments in relation to the regulation of pesticides and veterinary chemicals

Over 98% of cotton grown in Australia contains biotechnology traits. The APVMA plays a unique and key role in the Australian cotton industry as one of the regulators of biotech traits. The Office of the Gene



Advancing Australian Cotton

Technology Regulator (OGTR) is responsible for assessing the safety of biotech traits to human health, animals and the environment. In the case of genetically modified cotton containing insecticidal traits, the inserted genes act as pesticides within the plant, and as such are also required to be registered by the APVMA. The APVMA is primarily responsible for assessing the efficacy, safety and proposed use pattern of this genetically modified cotton.

The Australian cotton industry values the role of the APVMA as an independent regulator of biotechnology traits as it ensures a scientifically robust process for establishing and annually reviewing Resistance Management Plans for genetically modified cotton. This ensures the technology has an effective pre-emptive stewardship plan in place that protects the longevity of this important technology to the industry. Technology which has enabled the industry to reduce its pesticide use by 93% since 1997. Without this independent regulation, the onus of the implementation of resistance management of biotech traits would be with either the commercial trait providers, or the industry itself.

The need to ensure Australia's farmers have timely access to safe, environmentally sustainable and productivity enhancing products

It is imperative that Australian farmers have timely access to safe, environmentally sustainable and productivity enhancing crop protection products. The capacity of the APVMA to deliver timely decisions on new and amended applications and cost of regulation continue to be a barrier for the Australian agricultural industry.

The considerable cost of regulation means that registrants only seek to register agricultural chemical product uses where it is financially viable for them to do so. In the case of minor and specialty crops or use situations, the cost of registration often outweighs the perceived financial benefits for commercial companies. As a result, Australian producers of specialty and minor crops are faced many challenges in managing pest, weeds and diseases. Cotton Australia applies for a number of permits on behalf of its growers to cover specialty use situations that are not covered by established approved chemical use patterns. The lengthy time frames (often over 12 months) for having these minor use permits approved, or amended, is prohibitive to productivity. This is especially the case when emergency permits for new pest outbreaks are required. The prohibitive cost and time frames results in producers having to use products 'off-label'. The use of products in an unregulated, off-label situation creates potential risks with product safety, efficacy and resistance management for the whole Australian community.

Conclusion

Cotton Australia considers that the APVMA is a highly respected world leading independent scientific regulator. The role of the APVMA is crucial to the Australian agricultural industry in ensuring the industry has access to safe, environmentally sustainable and productivity enhancing crop protection products. Cotton Australia looks forward to any improvements that can be made to enhance the capabilities of the APVMA to deliver regulatory decisions that are both timely and cost effective.

Cotton Australia would welcome an opportunity to provide further information on its position. For more information, contact Sally Ceeney, Research Direction and Stewardship Policy Officer,



Advancing Australian Cotton

Yours sincerely,

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Cotton Australia