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**Community and Public Sector Union**

Lisa Newman – CPSU Deputy National President

11 October 2019

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

By email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Committee Secretary

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

As the primary union representing employees in the Australian Pesticides and Veterinary Medicine Authority (APVMA), the CPSU is committed to providing a strong voice for our members in key public policy and political debates. We welcome the opportunity to make a submission to this Senate inquiry into the Agricultural and Veterinary Chemicals Legislation Amendment (Australian Pesticides and Veterinary Medicines Authority Board and Other Improvements) Bill 2019 [Provisions].

While supportive of some aspects of this Bill such as enabling the APVMA to grant part of a variation application under section 27 of the Schedule to the Code Act, the CPSU is concerned about the possible impact of other changes proposed in the Bill to “simplify” and reduce regulatory provisions.

We have concerns about plans to “simplify” processes for chemicals of low regulatory concern. APVMA members have informed the CPSU that it may difficult to tell which products are of low concern, particularly where efficacy is key to their use. If a separate process is to be created, it needs to be very specific as to what chemicals or products are of low concern and why.

Similarly, it is also unclear to members why the simplification of corporate reporting requirements and annual returns is necessary. Reporting should be reflective of the needs of government and demonstrate transparency of the function and actions of the APVMA. There is no question that reporting reforms are needed but given that they are already relatively simple, it would be more appropriate that reports should be more relevant.


Members were of the view that what information needed to be on labels was currently clearly defined and were concerned that clarification would lead to a reduction of information. Label information is currently inconsistent between products and companies, many are outdated and require consideration. A lack of experience within the organisation may be a concern and the desire for greater clarity of label information may be the result of a combination of both long-term understaffing and influx of new staff.

Finally, members had concerns regarding changes that may reduce of the role of the APVMA through de facto increased outsourcing of responsibility to companies to self-manage implications for safety. The expertise the APVMA has in chemistry, manufacturing, safety and

efficacy creates a centralised repository of knowledge. That knowledge enables the APVMA to understand what is happening across a range of chemical products.

If you require any further information about this matter, please contact Osmond Chiu, Senior Policy and Research Officer

Yours sincerely



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Border Protection & International Affairs Team  
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