



one voice - adding value

17 April 2014

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

**Re: Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Bill 2014**

Dear Sir/Madam

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry. The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

The AFGC welcomes the opportunity to provide comment on *the Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Amendment Bill 2014* (the Bill), to inform the Senate Standing Committee inquiry.

The AFGC supports the work of the Australian Government to reduce the regulatory burden to industry through red tape reduction measures. The AFGC and its member organisations have limited involvement with the registration of agricultural and veterinary (agvet) chemicals; but are directly impacted downstream by any measures and decisions that impact on cost or availability of these products and costs within the APVMA. Any increased costs associated with reforms of agvet chemical regulation and will be passed on to chemical users including those in industries that provide the ingredients that go into food products. This means that the food industry has an important stake in ensuring that regulatory arrangements are not overly burdensome, and that costs are kept as low as possible.

The AFGC **supports** the passage of the Bill, including:

- Allowing less frequent renewal of registrations;
- Provision of meaningful improvements in human health, safety and environmental protection;
- Allowing for simpler variations to approvals and registrations;
- Obliging access to information about chemicals that the APVMA holds; and
- Permitting electronic lodgement of information and fees.

The AFGC has had the opportunity to review the submission prepared by Croplife and we are in support of their position and comments.

The AFGC considers that the Bill addresses a number of important issues –

- Australian companies are the ones who suffer the most from unnecessary delays and costs in regulatory approvals with inefficiencies slowing the introduction of innovative new products. This in turn impacts on Australian companies through increased costs or reduced capacity to innovate.



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- The pressures of performance and increasing competition will continue to compel all manufacturers to improve the effectiveness of investment in innovation. Excessive and unnecessary cost reduces incentive for innovation by industry, with negative consequences for investment in new products. More importantly, Australian consumers are missing out on the innovation that other developed economies enjoy.
- The Bill implements the Government's election commitment to remove re-approval and re-registration processes. The passage and implementation of the initiatives in the Bill would ensure a more streamlined regulatory system and a more effective regulatory authority that would in turn effectively protect human health and the environment.

The AFGC supports ensuring overseas data can be used to its full extent to streamline applications and ensure access to a wider range of chemicals provided that all disparities between Australian and overseas production systems have been considered fully. Our industries are small in world context and not unique. All Australian regulatory agencies could benefit from adopting this approach. We do not see that hazard assessment data needs to be reassessed by Australian regulatory agencies. We need a national system that ensures industries have access to chemicals registered in other countries as suitable for particular uses.

The food and grocery manufacturing sector is Australia's largest manufacturing sector with a strong presence in regional and rural Australia. Its concern is to ensure Australians continue to have access to safe and affordable food and grocery products, manufactured by a competitive and wealth generating industry. While the measures in the Bill might seem a small step to that end, the AFGC values and supports the Bill as one step in a journey to Australia's future prosperity.

Sincerely

Christopher Preston  
Director, Legal and Regulatory