

The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA)
Submission 2
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Attention: Committee Secretary

Re: The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA)

I am writing to you over my concerns about the way the APVMA approves chemicals for use in Australia. I do not have confidence in their approval process as I have dogs who I suspect have been made ill and one that passed away from flea treatments that the APVMA approved and said were safe for use. There have been thousands of reports of adverse reactions worldwide and these products are still being reregistered. The FDA released a warning on 20th September 2018 about the risks of some of these products, but the APVMA has not made any sort of public announcement. <https://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm620934.htm>

The APVMA have also chosen to continue the use of Glyphosate in Australia even though there have been issues in the US.

How can the Australian public feel safe about any chemicals on the market here if we ignore warnings from other countries who have researched these products and found issues with them. Shouldn't we be working together worldwide to keep our children and pets safe from harm?

In reference to a: the 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 APVMA has chosen to continue the use of Glyphosate in Australia even though there have been issues in the US and huge damages paid out to DeWayne Johnson after he was diagnosed with terminal Cancer. The evidence from this court case should give the APVMA concerns about this product and it should be reviewed in more depth, and possibly removed from sale until they can be completely confident about its safety.

In reference to b: the funding arrangements of the APVMA, comparisons with equivalent agricultural chemical regulators internationally and any impact these arrangements have on independent evidence-based decision making;

I do not feel confident that a large percentage of the APVMAs income comes from levies on sales and registration of chemicals. To me this is a conflict of interest as it makes sense that if they approve more chemicals their income stream will increase and it is not in their interest to ban any products and remove them from sale as they will lose income.

In reference to f: any other related matters.

I feel my story relates to The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority.

I can honestly say that I do not have confidence in the ability of the APVMA in making independent decisions due to the structure of their department and its funding and the loss of qualified staff after their move to Armidale, which in my belief was a complete waste of my taxpayer dollars.

My Boxer Portia died from a massive seizure after being given Comfortis, a flea product approved by the APVMA and deemed safe. My vet was at my home within 15 minutes and could not save her life. My other Boxer Finny also had Comfortis and he became paralysed over a period of less than two weeks. He was taken to Wagga University where they did a barrage of tests, but could only guess at what caused his paralysis. We were only able to save him after finding information in a Facebook group that assists owners with information on treatment of dogs that have been paralysed. The vets at the Wagga University gave us very little information to help, just 1 A4 page of Physiotherapy exercises and our own vet had no clue how to treat him. We were fortunate to find a Holistic vet who treated him and helped us to get him walking again. This was in October 2016. Since then he is

The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA) still suffering the after effects of this flea pill and has occasional small seizures and weakness in his limbs. The first vets we sought for treatment were not well informed on how to treat pets after an adverse reaction to these chemicals and that is a big concern. The APVMA has approved these products and declared them safe and the companies who sell them here have constantly denied any reports of adverse reactions, even though I have been in contact with hundreds of pet owners who have reported similar adverse reactions. The APVMA does have reports of adverse reactions.

In closing, I feel, there needs to be better regulation of the sale of these products. They should not have been rescheduled by the TGA so they can be sold anywhere, by anyone, without the knowledge of a pet's medical history or how to treat a reaction, if a pet has one. In the US and Europe they are sold as prescription only and should have remained the same here in Australia. The companies involved should have a responsibility to the health and welfare of our pets by informing vets on how to treat an adverse reaction and not denying they exist.

On the whole, we have been let down by an inadequate system and we cannot be confident that we will not be injured or made ill by a product that has been deemed to be safe by the APVMA. There needs to be more transparency in the approval of these drugs and much of the safety data is not available to the public, so we cannot reassure ourselves of the safety by knowing this data is accurate. There have been serious issues in other countries over the falsification of data to get products approved. These cases have been taken to court and fines were issued. We need to feel safe and know that our families are safe from harm.

Regards Carol Dehm

Website Links: Flea chemical FB group - <https://www.facebook.com/groups/138187053551225/>

FDA warning - <https://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm620934.htm>