



28th February 2018

Mr Rick Wilson MP
Chair of the Agriculture and Water resources Committee
Via email: agriculture.reps@aph.gov.au

Title: WAFarmers response to the Pesticides Inquiry – APVMA Review

Dear Mr Wilson

Introduction

The Western Australian Farmers Federation (Inc.) (WAFarmers) welcomes the opportunity to comment on the Future National Management of Ovine Johnes disease discussion paper.

WAFarmers is the state's largest and most influential rural advocacy and service organisation, boasting a membership of over 3,500 primary production businesses and individual farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$7.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy.

Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze and live in it. Agriculture was the largest contributor to national GDP growth in 2016-17, and is the fastest growing industry, particularly driven by the grains and livestock industries.

Discussion

The Australian Pesticides and Veterinary Medicines Authority (APVMA) are responsible for regulating the supply of agvet chemicals up to the point of retail sale. In July 2014, a range of legislative reforms came into effect with the aim of improving the efficiency and effectiveness of the APVMA's regulatory activities.

The reforms were wide-ranging and required the Authority to introduce a range of guidance, assessment and administrative procedures within a given timeframe.

WAFarmers acknowledge that the implementation of the 2014 reforms may have been interrupted with the relocation to Armidale NSW. This did result in a number of key staff leaving the Authority.

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Nevertheless, implementation of the legislative reforms to date has been mixed with some important reforms still to be accomplished four years after the audit in 2014.

This delay has caused further frustration for pharmaceutical and chemical companies who invest millions of dollars developing new products for market, or applying for licenses to bring new products into Australia, which meet the safety and environmental standards.

An effective and efficient regulator is critical for business and strategic planning and it ensures farming businesses have access to world leading chemical and veterinary medicine products.

There is considerable scope for the APVMA to improve its management of the reform projects and WAFarmers implores the Government to initiate a framework that will speed track the progress of these as a major priority.

WAFarmers would like to emphasise that priority must be given to the adoption of efficiencies such as clear procedural guidelines and predictabilities that will decrease cost implications for industry businesses, rather than focusing on governance issues such as the reappointment of an industry Board.

WAFarmers are aware that some reforms have resulted in small improvements, particularly for the pre-application process and the recognition of international data. However the recognition of international data submitted is inconsistent across different sections, assessors and case managers at APVMA.

WAFarmers is concerned about the historical practice of ad hoc decision making that continues to affect work flow processes resulting in haphazard, inefficient and inconsistent outcomes. We continue to be concerned with the current risk assessment framework and high pre-market authorisation requirements that impose substantial regulatory burden on industry, which is disproportionate to the risks that the products pose.

Post market requirements are further complicated by the dual responsibilities of both APVMA and the individual state and territory governments for control of the use and product compliance with varying degrees of enforcement in different jurisdictions. Again this has created inconsistencies and unpredictability's in post market compliance activities.

An effective and efficient regulation of agricultural and veterinary chemicals is essential to protect the health and welfare of livestock and companion animals, and the export status of our very important cropping industry.

The ANAO's detailed and considered performance audit report on the implementation of pesticide and veterinary medicine regulatory reform highlights the serious failure of the reform processes to deliver real regulatory efficiencies.

Instead of focusing on developing the urgent and necessary reforms required to assist the APVMA during the move to Armidale, the Department has spent more than three years rectifying the failures of the 2014 reform package.

WAFarmers has advocated since the announcement that the APVMA would be relocated to Armidale, that urgent and meaningful regulatory reforms to reduce regulatory burdens and



improve operational efficiencies, was urgently required.

WAFarmers primary concern with the current system relates to the ability of the APVMA to regulate agricultural chemicals and veterinary medicines efficiently, predictably and consistently.

Delays and inefficiencies end up adding unnecessary costs to crucial agricultural products, with these costs being forced back to the farm gate. The importance of APVMA maintaining its technical competencies whilst significantly improving efficiencies is crucial to the industry and the nation's farming sector.

WAFarmers believes sound investment in the APVMA is urgently required to bring its infrastructure, processes and guidelines in line with current global standards. Urgent action is needed to resolve this situation and we implore the Committee to assist the implementation process with appropriate funding within a set timeframe.

Regardless of whether an industry board or an executive management committee is used, the priority for APVMA must be to provide its legislated services effectively and efficiently.

WAFarmers fully support the responses to this inquiry submitted by Crop Life and Animal Medicines Australia.

Yours sincerely



Tony York
President WAFarmers

We thank you in advance for considering this request and we look forward to hearing your response.

Yours sincerely