



November 14, 2018  
Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and  
Transport  
PO Box 6100  
Parliament House  
Canberra ACT 2600

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

The VMDA is a member-driven organisation and members are encouraged to contribute to the successful future of Australian animal health and our export efforts. The VMDA is a peak body representing the animal health industry in Australia and comprises manufacturers, scientists, regulatory consultants and distributors. Cost-effective representation of the interests of the animal health community, with particular focus on issues affecting our Australian-based industry, is a key aim of the association.

**In responding to the invitation to make a submission to this enquiry, we have taken account of not only the interests of our members and the wider agricultural and animal health community including farmers and pet owners, we have also considered the welfare of the animals themselves which is a cornerstone of our members' businesses.**

Even leaving aside the clear fact that the treatment and ongoing welfare of animals is essential to the very existence of our industry, VMDA members are involved in pet ownership, farming, and other pursuits involving their animals, to a significantly greater extent than the general community. It follows therefore that their interests in this enquiry extend well beyond the financial and business aspects of their lives.

**The APVMA's processes for assessing and reviewing the ongoing use** of veterinary chemicals in Australia are robust and based not only upon their own observations and the APVMA's Adverse Experience Reporting Program (AERP), which provides for independent reporting of suspected adverse reactions from the public as well as the veterinary profession. In turn this program then requires registrants to provide a comprehensive response detailing their own investigation of each incident and their conclusions and any actions taken. In circumstances where there is clear evidence of the involvement of a product in the adverse

reaction, the Agvet Code provides for both voluntary and compulsory recalls of the products concerned.

It is important to note that in the history of the APVMA, there have been few adverse reactions that have been proven to be directly related to a product and where this has been the case, the authority and the registrant have acted together swiftly and effectively to remove any such product from the market place. The absence of any significant number of these incidents is testimony to the rigorous and independent processes followed by the APVMA in firstly, evaluating and registering products, and then their robust actions in the face of even the most nebulous of AERP reports.

**The funding arrangements of the APVMA** are open, transparent and independent, and subject to regular Cost Recovery Impact Statements available in the public domain. While industry would be delighted to see the authority fully funded by government, we recognise that in our 'user pays' society, independent assessment and regulation of our products is something that we have a responsibility for. While in other jurisdictions the models vary, in general there is a significant element of funding by industry.

This approach is little different to our overall economy where the cost of administering our society is borne to a greater or lesser extent by all citizens. We do not always approve of what is done with our taxes and other fees charged at many levels of our existence, but we accept that this is how 'the system' works. In our industry the same principles apply, it is just that we can see more clearly what is happening to our fees and charges, and what we are getting out of the process.

Similarly to the general population, we are not always happy with the process and outcomes and, far from influencing our regulator, we are often in the invidious position of seeing precisely where our money goes, how it is spent, and the extent to which we get (or do not get), value for money. At times probably we **wish** we could have more influence than we do, but we also recognise that the confidence of farmers, pet owners and others with animals (working and for pleasure) is dependent to a large extent on the perception of a truly independent and robust regulator, which we have.

**The roles and responsibilities of various government departments** are many and varied, beginning with the Department of Agriculture and Water Resources (DAWR), and the inevitable necessity for various State departments and agencies to be involved with control of use and other, specific, local needs.

Industry has the opportunity to comment on policy and legislative change, as is the case with most aspects of government where interested parties have the same chance. Our comments are often

considered (not always accepted), but the key point in this process is that we have the opportunity to provide information on potential unforeseen consequences that otherwise might be missed by people not deeply involved on a day to day basis in the industry.

Those comments are then considered and assessed together with all other aspects of government policy and with the interests of all of Australia's people and decisions ultimately made by government. As usual, we win some and we lose some.

**Timely access to safe, effective and environmentally sustainable products** is important not only for the farming sector, but for all animal owners. By definition, animals can only remain healthy in a healthy environment, and if only for our own financial benefit (which is not the case), it is necessary for us to produce and market safe and effective products, as it is for the APVMA and other agencies to ensure that the products that we register are fit for purpose and safe for animals, their owners and the environment.

Robust assessment is necessary for health and safety, as is timeliness for the benefit of animals and their owners. All participants in the process have their roles and while at times it can be seen to be complex and difficult, history shows that in Australia it has been successful.

**The relocation of the APVMA to Armidale was opposed by the VMDA**, and we continue to believe that this was a bad decision. However, the decision having been made, the APVMA and industry have had to work together to try to 'make the best of it'.

While we are frustrated with the inevitable delays due to loss of scientific staff, it is not the sole cause of the problems that industry sees within the authority. Poor decision-making in the past as to structure and processes within the APVMA had already resulted in delays and unnecessary complexity in decision-making. Since the decision was made to move the agency, key staff have been working hard to improve performance and there has been a significant effort made to continue to recruit quality scientists to replace those who have left or will leave prior to the relocation.

The decision to retain a Canberra office with decision-making senior staff will, we believe, assist with the improvement in processes and timeliness of decisions.

**Summary:**

**As a virtually fully cost-recovered authority, the APVMA has always demonstrated complete independence from industry, and has served the interests of consumers and animal welfare. Industry has battled with the regulator to try to improve performance to gain more certainty and clarity of outcomes in a timely manner.**

**Far from having an undue influence as the funding source for the APVMA's activities, we have worked to try to ensure that the relationship is not an adversarial one. Over the more than 20 years of the APVMA's existence, the regulator has ensured that the manufacture, registration and marketing of animal health products has been held to a standard that is the equal of anywhere in the world, and well above most jurisdictions.**