



14 November 2018

APVMA Inquiry  
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3 Glenarm Road,  
Glen Iris,  
VICTORIA, 3146

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

#### About AUSVEG:

AUSVEG is the National Peak Industry Body representing the interests of Australian vegetable and potato growers. AUSVEG represents growers from throughout Australia and works to ensure the National Vegetable Levy and the National Potato Levy are invested in areas that best meet industry needs.

AUSVEG also delivers national projects in the areas of communication, environmental sustainability, biosecurity, export development and market access on behalf of industry.

AUSVEG welcomes the opportunity to provide feedback into the independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA) to the Senate Standing Committee on Rural and Regional Affairs and Transport.

#### Basis of the inquiry:

On 16 October 2018, the Senate moved that the following matters be referred to the Rural and Regional Affairs and Transport References Committee for inquiry and report by **1 February 2019**:  
The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA), with particular 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;
- 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;
- c. the roles and responsibilities of relevant departments and agencies of Commonwealth, state and territory governments in relation to the regulation of pesticides and veterinary chemicals;
- d. the need to ensure Australia's farmers have timely access to safe, environmentally sustainable and productivity enhancing products;
- e. the impact of the APVMA's relocation on its capability to undertake chemical reviews in a timely manner; and
- f. any other related matters.

#### AUSVEG Overview:

AUSVEG, like many agricultural industry bodies, is disappointed an inquiry into the APVMA has developed through media stories based on emotion about glyphosate, rather than based on scientific fact and evidence based.

AUSVEG is supportive of the APVMA, and while there can be improvements made to the organisation, AUSVEG is comfortable that the APVMA is a world leading regulator and has full confidence in its ability to be an independent, effective and credible assessor of agricultural chemicals.



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;

AUSVEG accepts that review and reassessments are a timely and costly process for the APVMA, which is why AUSVEG is a supporter of only reviewing and reassessing when there are scientific and evidence-based cases which raise new concerns about a particular product.

The chemical and agricultural industries are built on the success of science and research and any decision-making process, whether it be an approval or reassessment, needs to only be made on a fact, as opposed to public sentiment.

AUSVEG was pleased to see the APVMA's recent focus on acceptance of international data. This is inline with industry's expectations that it will increase efficiency by reducing duplication, costs and time. Greater acceptance of the international assessments where appropriate, would deliver greater returns for growers.

AUSVEG does not believe there is a need to review and reassess Glyphosate, and believes there is no evidence or scientific argument to support a review.

Glyphosate is a crucial product for all of agriculture and the safety of the product has also been supported internationally by other equivalent regulatory bodies, where recent assessments found that glyphosate does not pose a human cancer risk.

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;

AUSVEG is comfortable with the existing funding arrangements used by the APVMA. AUSVEG does not believe the funding model influences APVMA's decision making ability, nor provide any incentive for APVMA to be influenced.

The current cost recovery model is set to ensure that the financial burden of chemical registration is not directly linked to the agricultural industry or the taxpayer. The registration process of chemicals by a private company is positive, and AUSVEG does not support this cost being passed on to governments.

The roles and responsibilities of relevant departments and agencies of Commonwealth, state and territory governments in relation to the regulation of pesticides and veterinary chemicals;

AUSVEG supports the continued role of the APVMA in regulating pesticides and veterinary chemicals registration and usage at a national level and supports the current role that states have in regulating chemical usage in their jurisdictions. AUSVEG supports a system which reinforces the efficient and effective use of chemical products by farmers as a practical solution, and that chemicals are used with due care.



The need to ensure Australia's farmers have timely access to safe, environmentally sustainable and productivity enhancing products;

Australian growers operate in a global market, competing on a world stage to deliver access to quality and safe produce to its consumers. Timely access to safe, environmentally sustainable and productivity enhancing products is absolutely crucial to ensure the countries ongoing global competitiveness in food production.

It is important that growers have access to world leading chemicals and that APVMA is adequately resourced to conduct a quality assessment on any new chemicals in a timely manner.

A more adequately resourced regulator should equal a swifter approvals process bringing with it improved confidence from chemical companies to bring their products to Australia, and greater confidence from growers, that they have access to the world's best chemicals.

AUSVEG continues to promote best practice to chemical use on-farm.

The impact of the APVMA's relocation on its capability to undertake chemical reviews in a timely manner;

Regardless of the APVMAs relocation, an improvement from the status quo would be welcomed by the industry as it currently not meeting targets for timely registration and permit assessments. Currently the APVMA is not performing at a sufficiently acceptable level and any reduction in performance is not acceptable. AUSVEG has had anecdotal comments from industry stakeholders that the relocation and loss of premier talent in the organisation is having a substantial impact on the APVMA's capacity to deliver in a timely manner.

This is why AUSVEG only supports a relocation, or change, in which the APVMA is properly supported and resourced to improve upon its current capacity deliver results for growers.

AUSVEG thanks the Rural and Regional Affairs and Transport References Committee for the opportunity to respond to this inquiry.

For anything further, please contact Tyson Cattle, AUSVEG National Manager – Public Affairs

Yours sincerely,

Tyson Cattle,  
National Manager – Public Affairs