



THE UNIVERSITY  
of ADELAIDE

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

13 November 2018

Dear Dr Thompson,

In response to the Inquiry into the independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA), I would like to make the following submission.

I am an Associate Professor of Weed Management at the University of Adelaide. I have for the past 28 years worked in the areas of herbicides and weed control and am considered an international expert in this area. I also chair the Australian Glyphosate Sustainability Working Group (AGSWG). However, my remarks below should be considered my personal views informed by my 28 years work in Australian grains industry and my international experience and not necessarily those of the AGSWG. Several members of the AGSWG will be involved in other submissions.

In response to the terms of reference:

- 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 national need is for an effective pesticide registration process that protects users, the environment and consumers, and is based on the best science available. The APVMA has a long history of effective regulation of pesticides in Australia. Australia is known internationally for having a robust registration processes for pesticides.

It is important that Australia maintain its risk-based scientific approach to pesticide registration. This offers the appropriate way of providing safe and effective pesticides for use, while at the same time providing protection for users, the environment and consumers. Movement away from a risk-based approach to registration raises the opportunity for subjective factors to skew the registration process.

It is important that there are reviews of existing registered pesticides. This should be on the basis of new information becoming available either through the scientific literature or through issues in use. It is most appropriate that these reviews and reassessments are done in response to new information or new processes, as having reviews for the sake of having reviews is of little practical value.

There has been a lot of misinformation promulgated through the press and the internet about pesticides and about glyphosate in particular. It would be a poor outcome to have a regulatory system that responded to every activist campaign in the media regardless of the scientific

evidence. The APVMA has responded appropriately to new information about the safety of glyphosate. It has assessed the new material available and responded accordingly.

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;

As required by government policy, the APVMA operates on a full cost-recovery basis. This includes fees charged to registrants to evaluate their registration proposals and a levy charged on pesticide sales. It is not obvious that this funding model is having any negative impact on the assessment of registration proposals by the APVMA, as the fees and charges are prescribed.

The alternative arrangements for funding are to have the APVMA funded entirely by the taxpayer; or a mixed model. There is some financial danger to a regulator funded entirely by the taxpayer. In the first place, the funding and operations can be imperilled at the whim of the government of the day. Also, if there is no financial risk to registrants submitting registration proposals, there is a high probability of poorly conceived registration proposals being submitted. The large number of registrants of generic products in Australia make this a particular concern.

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;

Pesticides in Australia are registered on a national basis, but their use is enforced on a state basis. This creates some gaps within the system, where products are allowed be used in one way in one state, but not in another. For example, there are label rates or use patterns on product labels that apply differently across states, which creates confusion among users.

There are also significant differences between states in their capacity and willingness to manage off-label use. It would be helpful if use and enforcement of applications was more harmonised across Australia.

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

Australian farms are by International standards large and highly mechanised. As a result pesticides are relied on heavily for pest management. The effective use of pesticides has been one of the key factors in productivity gains over the past 30 years by grain growers. In particular, herbicides have allowed the adoption of reduced tillage, residue retention farming systems, of moisture retention and reduced soil erosion. Fungicides have allowed higher yielding crop cultivars to approach their yield potential.

This reliance on pesticides has come at some cost. Pests are evolving resistance to pesticides requiring the adoption of new strategies for pest management and the need for new pesticides.

On the other side, Australia is a relatively small market for pesticides. Internationally, there has been tremendous consolidation in the agricultural chemical space as companies merge. This has dramatically reduced the number of companies doing research and development on new pesticide molecules and frequently these molecules are being developed for large markets in Europe and North and South America and the main commodity crops grown in those locations.

It is already difficult to get new molecules registered for the Australian market and frequently these come to Australia some years after they were registered in Europe or North America. Actions that would make it more difficult for products to be registered in the Australian market compared to North American markets, for example, are likely to serve as a further disincentive for international agriculture chemical companies to bring products forward for Australian farmers.

An issue already faced within Australia is the large number of crops grown across small areas. For these minor crops the costs of getting pesticide products labelled can exceed the likely return to potential registrants. This results in few products available to growers. Australia has a permit system that is regularly used to allow additional products to be used by growers of minor crops; however, that system has the intention that the permit uses will be moved onto labels. In practice this too often does not happen due to a lack of willingness by registrants to invest in minor crop use. In the USA, this market failure gap is filled by the IR-4 program. A similar program would be of significant value to Australian farmers.

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

The relocation of the APVMA to Armidale has been quite disruptive to the activities of the regulator. My personal perception is that registrations have been moving more slowly through the regulator in the last year than previously. It remains to be seen how well the regulatory process runs once the move is finalised. However, in my personal opinion, Armidale is a poor choice for a national regulator who is required to consult and interact with a large number of stakeholders.

Yours sincerely

Christopher Preston  
Associate Professor, Weed Management