



25/9/19

Re the Agricultural and Veterinary Chemicals Legislation Amendment (Australian Pesticides and Veterinary Medicines Authority Board and Other Improvements) Bill 2019

In general terms this Bill has my support. I was pleased to read Section 14 D (5) i.e.

“(5) The APVMA must not determine a kind of chemical product under subsection (6) unless it is satisfied that the kind of chemical product would: :

- (a) meet the safety criteria, the trade criteria and the efficacy criteria; or
- (b) comply with the established standard for the kind of chemical product.”

It is critical that Australia keeps efficacy as a consideration. Veterinary medicines are the essential tools for vets and it is essential that these tools actually work. In the USA, efficacy is not a consideration for registration and many products sold as animal treatments do not actually work e.g. herbal dewormers.

However Section 14 C (5) just states safety i.e. “(5) The APVMA must not determine a kind of active constituent under subsection (6) unless it is satisfied that the kind of active constituent would meet the safety criteria.” Which seems slightly confusing and would be better worded as in 14 D (5).

The changes to compliance activity are also supported as too many veterinary medicines are advertised on social media without AVMA registration. A recent example was the selling of a Hendra virus vaccine that was just bottle water by a chiropractor in Queensland.

Yours faithfully,

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