

11 April 2014

Committee Secretariat  
Senate Standing Committees on Rural and Regional Affairs and Transport  
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Parliament House  
Canberra ACT 2600  
Email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Committee Secretariat

***RE: Submission on Agricultural and Veterinary Chemicals Legislation (Removing Re-approval and Re-registration) Amendment Bill 2013***

The National Farmers' Federation (NFF) welcomes the opportunity to comment on the *Agricultural and Veterinary Chemicals Legislation (Removing Re-approval and Re-registration) Amendment Bill 2013*, to inform the Senate Standing Committee on Rural and Regional Affairs and Transport's current inquiry.

The NFF and its member organisations tend not to be regularly engaged in the registration of chemicals. However, Australian farmers need a system of chemical registration that facilitates the introduction of new chemicals onto the Australian market in a timely and cost efficient manner.

The NFF is not in a position to provide comment on all specific details of the Bill, but notes that the assessment and registration process should be a transparent efficient and effective process to reduce the cost borne by farmers for access to agvet chemicals. It should also shorten registration and reconsideration response timeframes. Reforms that would improve the efficiency and effectiveness of the APVMA's operations are supported by Australia's farm sector. However, we note that chemical registrants will be impacted the most by the proposed changes, and are in a better position to understand the implications and potential costs for their sector.

The NFF were vocal opponents to the previous Government's plans to implement a mandatory re-registration process, duplicating existing chemical review processes and delivering an unnecessary regulatory burden on the agriculture sector. The NFF welcomes the current Government's commitment to remove this unnecessary process.

The NFF is aware that under existing chemical review arrangements the APVMA has the flexibility to review registrations when new research or evidence has raised concerns about the use or safety of a particular chemical or product. The NFF is encouraged that the

Government supports this existing process, rather than going through with mandatory re-registration which would have denied Australian farmers access to chemicals which are actually safe, potentially exacerbating issues related to minor and off label use of farm chemicals.

The NFF is also supportive of other amendments in the Bill, including reducing red-tape by allowing for less frequent renewal of registrations, allowing for simpler variations to approvals and registrations, and allowing electronic lodgement of information and fees. Although, it is noted that the APVMA would need to be flexible to the various needs of industry, for example their ability to provide relevant information electronically.

Chemical product quality is critical for industry protection and safety. NFF agrees that APVMA must have the authority to request samples of any imported or locally manufactured agvet chemical product for quality assurance.

The NFF would also like to note the importance of appropriate timeframes for implementation of any changes. The NFF notes that major changes to regulatory systems can take time for the APVMA to implement and for chemical registrants to adapt to. It will be important that this is considered through the implementation of proposed changes.

The Bill also needs to be considered in the context of related current Government initiatives. The \$8M funding commitment to help address issues associated with the minor use program is welcomed by NFF's member organisations involved in minor use and emergency permits, although the current allocated funding may well be insufficient to address these issues, more can and should be done. The minor use regulatory guidelines and prioritisation framework will help agricultural industries respond to new pest and disease incursions. Rapid response to new, unforeseen biosecurity issues is critical for agricultural productivity and protecting trade. Further access to new and innovative agvet chemical products through initiatives such as funding for minor use programs, is likely to ease industry concern regarding lack of access to new products and potential loss of existing products.

The NFF commends the Government on their commitment to this process and would support passage of the *Agricultural and Veterinary Chemicals Legislation (Removing Re-approval and Re registration) Amendment Bill 2013* through Parliament.

The NFF encourages the Government to continue working collaboratively with industry and consider any further reforms of agvet chemicals through a holistic approach. Thank you for the opportunity to comment on the Bill. If you have any questions regarding this letter, please contact NFF Rural Affairs Manager, David McKeon on 02 6269 5666.

Yours sincerely



**MATT LINNEGAR**  
Chief Executive Officer