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Agvet Review
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Dear Sir/Madam

**Discussion Paper: Operation of the amendments in the Agricultural and
Veterinary Chemicals Legislation Amendment Act 2013**

I am pleased to provide comments from Animal Medicines Australia (AMA) that may assist in the review of the 2013 agvet legislation amendments.

AMA is the peak industry body representing the leaders of the animal medicines industry in Australia. AMA member companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products that prevent, control and cure disease across the companion animal, livestock and equine sectors.

AMA works closely with its members, a variety of organisations, and governments to promote an evidence-based approach to public policy. Additionally, AMA advocates for the responsible and judicious use of all veterinary medicines to improve and protect animal health and welfare.

The Australian animal medicines industry is engaged with a broad range of regulatory agencies at State/Territory and Commonwealth levels. A key agency is the APVMA.

The essential and rigorous work done by the APVMA, in making independent, scientifically valid, and credible decisions, critically underpins positive outcomes for animal health, animal welfare, the environment, human health, worker safety, productivity, public health, food safety, and importantly gives confidence to Australian consumers governments and the publics of Australia's trading partners.

Notwithstanding, AMA looks forward to continued collaboration with the regulator to improve predictability and efficiency. To this end, AMA notes:

“The Amendment Act aimed to simplify, re-organise and modernise the Agvet Code, and reform the approval, registration and reconsideration of agvet chemicals to improve the efficiency and effectiveness of the existing regulatory arrangements.”¹

The Discussion Paper identifies a number of complicating factors that hamper assessment and review of initiatives.

¹ [Acil Allen Discussion Paper, 2019](#) p3

Whilst supportive of a range of the changes it has not been possible for AMA to quantify the benefits, or otherwise, of the 2013 legislation amendments since they commenced on 1 July 2014.

AMA does note recent positive on-going developments and improvements; including those contained in the:

- Agricultural and Veterinary Chemicals Legislation Amendment (Timeshift Applications);
- Agricultural and Veterinary Chemicals Code (Notifiable Variations) Instrument 2019;
- Agricultural and Veterinary Chemicals Code (Prescribed Variations) Instrument 2019;
- Agricultural and Veterinary Chemicals Code (Application Requirements) Amendment Instrument.

The APVMA has been subject to continuing reviews:

- in June 2017 the Australian National Audit Office (ANAO) published its report on Pesticide and Veterinary Medicine Regulatory Reform² The ANAO made 4 recommendations;
- separately, the Reason Group was commissioned to undertake an Independent Review of Assessment Performance³ and presented its findings and recommendations in December 2017;
- in February 2018, AMA provided a submission⁴ to the Standing Committee on Agriculture highlighting some improvements and opportunities for improvement;
- the Standing Committee issued its Report⁵ in May 2018 with 4 recommendations; and
- APVMA will shortly commence a Cost Recovery Impact Statement process.

AMA also recognises the considerable effort that is currently dedicated to the Armidale relocation.

For any organisation there is important need to establish processes and systems for continuous improvement. Currently, there appears the potential for inefficiencies through overlapping reviews. AMA contends that there could be benefits for the APVMA in:

- establishing robust performance measurements (identified by the ANAO); and
- ensuring appropriate on-going consultation mechanisms to support continuous process and systems improvements.

I trust this information is of assistance. If I can provide additional information please do not hesitate to contact me.

Yours Sincerely

Ben Stapley
Executive Director

² <https://www.anao.gov.au/work/performance-audit/pesticide-and-veterinary-medicine-regulatory-reform>

³ https://apvma.gov.au/sites/default/files/publication/28811-final_apvma_report_20171222.pdf

⁴ <https://animalmedicinesaustralia.org.au/wp-content/uploads/2018/04/Submission171207.pdf>

⁵ Standing Committee Report May 2018