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9 June 2021

Corporate Services  
Australian Pesticides and Veterinary Medicines Authority  
GPO Box 3262  
Sydney NSW 2001

Submitted by email only: [complaints@apvma.gov.au](mailto:complaints@apvma.gov.au)

To whom it may concern,

**Re: APVMA Complaints Handling Policy**

Thank you for the opportunity to provide feedback on the APVMA's approach to managing complaints and feedback.

Animal Medicines Australia (AMA) is the peak industry body representing the leading animal health companies 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 in the livestock, companion animal and equine sectors. AMA member companies represent more than 90% of Australian sales of registered veterinary medicines.

AMA is pleased to note that industry engagement with the APVMA has markedly improved in the last 2 years, particularly in the Registration Management area. This has resulted in policy and operational improvements that support mutual understanding as well as provide clarity on requirements, greater predictability and much needed efficiency benefits for both registrants and the regulator.

AMA has been particularly impressed by the willingness of the APVMA to consult with industry to develop mutually acceptable solutions to address disruptions arising from the pandemic. For example, COVID-related travel restrictions significantly disrupted manufacturing audit schedules, requiring a collaborative approach by APVMA with industry to maintain assurance of product quality standards under alternative audit arrangements, thereby ensuring the availability of critical animal health products during the pandemic.

AMA believes this updated Complaints Handling Policy is an indication that the regulator is seeking to embed the principles of best practice regulation throughout the organisation. AMA is very supportive of such actions.

The updated Complaints Handling Policy aligns well with the goals for a best practice regulatory culture promoted by the Office of Best Practice Regulation (Department of Prime Minister and Cabinet). Best practice regulation is underpinned by good governance practices and clear accountability, and supports and promotes stakeholder engagement that is:

- responsive,
- timely,
- predictable,
- accessible,
- transparent,
- efficient, and
- effective.

These goals promote effective and efficient engagement with stakeholders, alongside the provision of high quality regulatory oversight, advice, programs and services. The updated Complaints Handling Policy clearly captures these features.

AMA agrees that it is appropriate to handle staff grievances, code of conduct complaints and public interest disclosures through separate mechanisms.

In summary, AMA supports this updated Complaints Handling Policy and commends the APVMA for continuing to embed the principles of best practice regulation throughout the organisation.

If we can provide any further information, please contact me at [c.bennett@animalmedicines.org.au](mailto:c.bennett@animalmedicines.org.au) or at (02) 6257 9022.

Yours sincerely,

*(unsigned for electronic submission)*

Dr Charmian Bennett  
Director of Science and Policy