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Domestic Food Regulation
Department of Agriculture, Water and the Environment

Submitted via email only: domesticfoodregulation@agriculture.gov.au

Re: Consultation on Domestic Organics Regulation Impact Statement

Thank you for the opportunity to provide comments on the Domestic Organics Regulation Impact Statement.

Animal Medicines Australia (AMA) is the peak industry body representing the leaders of the animal medicines industry in Australia. Our members companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products to protect and treat animal illness, disease and injury, and support animal welfare across the livestock, equine and companion animal sectors. AMA members range from local businesses to the local divisions of global companies and includes companies who manufacture in Australia for global export markets. AMA members represent more than 90% of Australian sales of registered veterinary products.

Veterinary medicinal products are essential tools for veterinarians and farmers to promote and protect animal health and welfare, food safety, public health, environmental health, agricultural production and trade, sustainability, innovation and investment. Animal health is the foundation of animal welfare and supports the sustainable production of safe, high-quality food and fibre derived from animals.

Animal health and welfare

AMA acknowledges that producers are free to choose the farming system they use, whether conventional or organic. However, AMA's primary concern is that regardless of the farming system, animal health and welfare must be protected.

It is unethical to withhold veterinary medicines from a sick or injured animal in order to protect a specific marketing claim. If an animal is sick or injured, it should be treated promptly with safe and effective veterinary medicines that will not pose a health risk to people who consume or use the resultant animal-derived commodity.

Only veterinary products approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA) should be used on food-producing animals. Registered products are rigorously tested to ensure they are effective and safe to use (for both the animal and the person administering the product). This regulatory process provides confidence for the consumer that the resultant meat, milk, eggs or fibre will be safe to consume or use.

Veterinary medicines that have not been approved by the APVMA pose significant risks of residue violations in the resultant commodities. Unapproved veterinary medicines may be ineffective or inappropriate for the condition being treated, and their use can lead to prolonged, avoidable pain and suffering.

To protect animal health and welfare in an organic farming system, there should be a clear pathway to enable an animal to be transferred from an organic supply chain to a conventional system in order to protect its health and welfare. Sick or injured animals should be treated with safe and effective registered veterinary medicines, regardless of the farming system. Withholding veterinary treatment on the basis of a label claim is unacceptable to consumers of both organic and conventionally-produced products.

Proliferation of misleading and false claims in an unregulated market

AMA agrees with the points raised by Croplife in relation to misleading and false claims in the domestic organics market. The current lack of mandatory regulation for domestic organics has allowed the proliferation of misconceptions about both conventional and organic production systems, and fails to provide clarity or confidence to the consumer about the true meaning of organic claims, certification statements, labels and advertisements.

Organic products tend to attract a price premium. However there are many interpretations of what 'organic' means, including 'healthier', 'clean', 'pure', 'chemical free', 'pesticide-free' and others. This has led to unjustified community concerns about conventional farming systems and encourages the use of false claims on labels and in advertisements to justify a price premium for organic products.

Regulatory structure

AMA agrees with Croplife that monitoring and enforcement of a domestic organics regulatory standard must be a Commonwealth responsibility. The current lack of regulation has only encouraged the proliferation of misinformation, unjustified claims and misleading advertising, to the detriment of both organic and conventional farmers. Price premiums for organic products provide a considerable financial incentive to ignore or circumvent regulatory standards. Consumer trust and confidence will depend on government enforcement of those standards.

Further, if the Australian Standard *AS6000:2015 - Organic and biodynamic products* is to be used as the basis of a domestic regulatory scheme for organics, then it must be made freely accessible to both producers and consumers. It should not be locked behind an expensive paywall.

If we can provide any further information, please feel free to contact me.

Yours Sincerely,

Dr Charmian Bennett
Director Science and Policy
(*unsigned for electronic submission*)