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24 March 2022

Angela Brierley
Director, Food Regulation and Biosecurity Policy
Agriculture Victoria

By email only: chemicals.policy@agriculture.vic.gov.au

Dear Ms Brierley,

Re: minor administrative amendments to the Victorian *Agricultural and Veterinary Chemical Control of Use Act 1992*.

Thank you for the opportunity to provide comments on some minor administrative amendments to the Victorian *Agricultural and Veterinary Chemical Control of Use Act 1992*. AMA is pleased to provide comment on the second amendment to expand the definition of 'label' so that the APVMA approved label will be the applicable standard in most cases.

Animal Medicines Australia (AMA) is the peak industry body representing the leaders of the animal medicines industry in Australia. Our members companies innovate, manufacture, formulate and register a broad range of veterinary medicine products that protect and treat animal illness, disease and injury, and support animal welfare across the livestock, equine and companion animal sectors. 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, 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.

AMA supports national harmonisation of rules and regulations governing the use of veterinary chemicals to protect and improve animal health and welfare across Australia. It is important to move towards national consistency in the interpretation of key concepts and terms like 'label', so that all stakeholders have a shared understanding and are using veterinary chemicals products correctly. This

is particularly important in border regions where veterinary chemical users may be operating in multiple jurisdictions.

AMA therefore does not oppose the proposed change to the definition of 'label' in Victoria.

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)