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15 December 2021

Ben Roddy
Senior Biosecurity Officer
Food Regulation and Biosecurity Policy
Agriculture Victoria

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

Dear Mr Roddy,

Re: proposed changes to the Agricultural Chemical User Permit (ACUP)

Thank you for the opportunity to provide comments on proposed changes to the Agricultural Chemical User Permit (ACUP).

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, 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.

Our comments are focussed on the first proposal to introduce the ACUP requirement for the use of veterinary chemicals that are Schedule 7 poisons (Dangerous Poisons). AMA supports the responsible use of all veterinary medicines, including measures that minimise potential risks by ensuring users are appropriately trained and informed to handle and administer veterinary chemicals safely.

AMA believes it is appropriate to require users of Schedule 7 poisons to hold an Agricultural Chemical User Permit (ACUP). Schedule 7 poisons have potential to cause harm at low exposures and require specialised skills in order to handle and use them safely. Requiring users of Schedule 7 poisons to obtain an ACUP will ensure that these chemicals are prepared, applied, transported and stored appropriately.

AMA supports the exemption of the ACUP requirement for registered veterinary practitioners (and those working under their direct and immediate supervision) in Victoria to use Schedule 7 poisons as veterinarians are already highly trained in the use of potentially dangerous chemicals.

Many veterinary Schedule 7 poisons are parasiticides and are vital inputs to agricultural production that improve productivity and protect animal welfare. The new requirement for users to hold an ACUP is an appropriate risk management strategy to protect users whilst also ensuring that these important veterinary chemicals remain accessible to farmers.

AMA also supports national harmonisation of rules and regulations governing the use of veterinary chemicals to protect and improve animal health and welfare across Australia.

In summary, AMA supports the proposed updates to align Victoria's requirements for the use of Schedule 7 chemicals with national harmonisation agreements.

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)