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Engagement and Communications
Australian Pesticides and Veterinary Medicines Authority
GPO 574
Canberra ACT 2601

By email only: engagement@apvma.gov.au

Dear Engagement and Communications team,

Re: Reviewing the APVMA's engagement model

Thank you for the opportunity to provide feedback on APVMA's stakeholder engagement model.

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. Our member companies include both local and global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Representing the interests of the Australian animal health industry, AMA can provide the APVMA with a considered view of sectoral challenges and identify opportunities for improvement in the regulatory environment.

Effective consultation is essential to improving the regulatory environment for both the end users of registered products and for registrants. AMA supports timely, genuine and comprehensive consultation with industry that aligns with the Australian Government Best Practice Consultation guidelines¹ and promotes transparent, open, collaborative, meaningful and regular dialogue between the regulator and the regulated community.

¹ [Best practice consultation | The Office of Impact Analysis](#)

AMA welcomes the commitment from APVMA to deliver greater transparency for the regulated industry, consumers and other stakeholders, and the implementation of a two-way, collaborative approach to both defining problems and identifying solutions. Effective, meaningful and systematic consultation processes deliver benefits for all stakeholders, including minimising the impact of regulatory changes, ensuring that proposals fully take account of views of, and impacts on, key stakeholder groups, and generating superior regulatory outcomes for the benefit of all Australians, our animals and our shared environment.

Structure and governance

The proposal currently identifies a hierarchy of consultation arrangements based on Strategy, Operations and Information. This approach is supported in principle, noting the relevance of different stakeholder groups to different aspects of APVMA's functions.

AMA anticipates that the membership, role, responsibilities and scope of each consultation group will be further refined as the APVMA moves to implement this new structure. AMA also supports the retention and incorporation of key existing consultation forums that focus on specific issues, such as the Manufacturing Licensing Scheme Industry Liaison Collaborative Forum (MLS-ILCF).

AMA supports broad, effective consultation with interested stakeholders at multiple, appropriate levels. In particular, AMA notes the Advisory Group is proposed to include "NGO's with specific interests in the statutory criteria". Whilst AMA recognises and encourages the importance of community stakeholder engagement, representatives should be selected subject to a willingness to engage constructively on strategic issues of relevance to APVMA's functions. NGO's with principles of operation that contradict the scientific and risk-based functions of the APVMA are unlikely to add value to APVMA's consultation processes.

AMA supports the proposed division of operational-level consultation into separate groups for agricultural chemicals and veterinary medicines. The scope and diversity of issues affecting each sector is likely too big for a single group with limited representatives from each sector to effectively consider, especially within the two proposed meetings per year. Sector-specific discussions will facilitate deeper engagement on topics of interest in each sector, as well as greater efficiency. There is, however, a degree of overlap for both sectors at the Operational level, so some cross-sectoral discussions may be useful and appropriate to discuss certain issues.

Engagement Groups

AMA supports the creation of multiple consultative groups, each with a defined purpose and scope. This provides opportunities for stakeholders to engage with the regulator at the level most appropriate to the issue being discussed.

A multi-level consultation structure will:

- ensure a broad range of perspectives while keeping numbers manageable in discussions,
- allow for more focussed discussions on sector-specific challenges, and
- provide opportunities to concentrate on new developments potentially affecting that sector.

Advisory Group (Strategic)

Strategic-level discussions should prioritise key stakeholders, primarily industry peak bodies representing manufacturers and users, and other government agencies where relevant. AMA notes that the proposal to include users, sellers, non-registrants, ‘thought leaders’ and non-governmental organisations may mean this group could be too broad for genuine or meaningful engagement. AMA looks forward to working with the APVMA to develop clear terms of reference to focus the Advisory Group’s deliberations.

Registrants Working Groups (Operational)

The Operational consultative groups should prioritise engagement with registrants and peak bodies to explore sector-specific issues, where expertise in the regulatory process is required. AMA supports separate working groups relating to agricultural chemicals and veterinary medicines to reflect the considerable differences in how products in each sector are manufactured, accessed, used and monitored. A segregated approach will support greater efficiency in consultation and superior regulatory outcomes.

Registrants Information Updates (Informational)

AMA supports the provision of regular information and updates to a wider range of interested stakeholders (in addition to the other two consultative tiers). Information Updates will be of interest to a variety of stakeholders, from registrants and industry bodies to the supply chain, special interest groups, consumers, and the broader community.

AMA would welcome further discussion with the APVMA about how Information Updates can facilitate a two-way exchange of information - for APVMA to consult and educate, and for participants to ask questions and build understanding. Responding to questions separately after the event is likely to create a significant burden of work for both APVMA and stakeholders, and increase the chances of pertinent information not reaching all of the intended audience.

Membership Selection Criteria

AMA supports the formalisation of membership criteria for each consultative group, alongside specific Objectives and Terms of Reference for each group. Participants should declare their agreement with such terms before joining a consultative group. AMA also supports the development of criteria to formally dismiss a consultative group member when necessary.

Summary

AMA welcomes the development of a new engagement strategy by APVMA that prioritises meaningful, transparent, open, efficient and regular engagement with a range of stakeholders from the regulated industries and the wider Australian community.

AMA looks forward to participating in these important forums and working with the APVMA to protect a regulatory framework based on robust evaluation, scientific evidence and risk assessment, to benefit the health and welfare of all animals in our care.

If you have any questions about this submission, please feel free to contact me.

Yours sincerely,

Dr Charmian Bennett

Director Science and Policy