



QUEENSLAND FARMERS' FEDERATION

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Submission

23 February 2021

Agvet Chemicals Branch
Department of Agriculture, Water and the Environment
GPO Box 858
CANBERRA ACT 2601

Via email: reviewsubmissions@agriculture.gov.au

Dear Sir/Madam

Re: Independent review of the agvet chemicals regulatory system

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Queensland United Egg Producers (QUEP)
- Turf Queensland
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Lockyer Water Users Forum (LWUF).

The united voice of intensive and irrigated agriculture



QFF welcomes the opportunity to provide comment on the Independent Panel's draft report on the review of the agvet chemicals regulatory system. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Background

QFF understands that the purpose of the draft report is to provide stakeholders with the opportunity to review the Independent Panel's proposed reform package for agricultural and veterinary chemicals regulatory system. Noting that pesticides and veterinary medicines, as referred to as agricultural and veterinary (agvet) chemicals.

The review examined the agvet chemicals regulatory framework's aims, structure, and operation, and makes recommendations to ensure that it is contemporary, fit for purpose and reduces unnecessary red tape.

QFF acknowledges that agricultural and veterinary chemical regulations have a crucial role in ensuring Queensland's farmers have access to safe, effective and modern crop protection products that enable them to farm more productively, profitably and sustainably. These products are also crucial for our nation's environmental land managers combatting threats to our natural environment; and are effective pest and disease management in plants and animals in our homes and gardens, so overall improving Queensland's social and economic wellbeing.

As such, it is essential that the regulatory framework for approving and licencing agvet chemicals supports the increasing pace of science and innovation outcomes in plant and animal science while maintaining the safety and suitability of these chemicals. Any reform process must deliver whole-of-industry benefits and, whilst QFF recognises the extensive amount of work undertaken to date, some of the recommendations outlined in the draft report will lead to increased administrative burden without improving outcomes. QFF only supports recommendations that genuinely improve, strengthen and modernise the entire regulatory system.

QFF supports the concerns and principles outlined in its members' (Growcom) submission. Notably:

- The Australian regulatory system for agvet chemicals requires focus on the greater number of product uses, rather than greater numbers of product registrations. The draft report does not acknowledge this.
- Health and safety for humans, animals and the environment should be the primary focus rather than access to chemicals, and clarification of this in the draft report is welcomed.
- The Australian Pesticides and Veterinary Medicines Authority (APVMA) needs to be allowed to fulfil its role of being a science-based regulator and not undermined by the introduction of an added system, designed to fast track registrations based solely on international approvals.
- The APVMA should be supported as the single regulator without the introduction of a Commissioner for licensing schemes or otherwise.
- While harmonisation around control of use is supported, collaboration between states is still needed and should be suitably funded. We do not support the implementation of an approach analogous to the current Victorian model of Control of Use.
- QFF supports capacity building within the State regulators and APVMA for the management of safe effective use of agvet chemicals.
- The draft report recommendations do not acknowledge or note the recommendations contained in the Deloitte paper 'Agvet Chemicals – Market Drivers and Barriers, Department of Agriculture' (July 2019). Specifically, regarding where it was highlighted that changing the current situation requires a detailed assessment of costs, benefits and risks for proposed options (something which is not evident in this draft report).



- The exclusion of anti-fouling paint, pool/spa chemicals, household fly sprays, household garden pesticides and flea collars from regulation by the APVMA is not supported.
- QFF advocates that the inclusion of efficacy assessments as part of agvet chemical registration is necessary.
- The APVMA permit section is supported with staff and resources to enable this critical work to continue, noting that this will require resourcing which must be funded without additional cost to the sector.

Yours sincerely

Dr Georgina Davis
Chief Executive Officer