



**Australian Government**

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**Australian Pesticides and  
Veterinary Medicines Authority**



## **Renewing the APVMA's engagement model**

Submissions received

February 2025

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

Email: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)

To whom it may concern

Thank you for the opportunity to provide this response to the Renewing the APVMA's engagement model consultation paper December 2024 (the Consultation).

Accord is the peak national industry association representing the manufacturers and marketers of formulated hygiene, personal care and specialty products, their raw material suppliers and service providers. Accord member companies make and/or market a broad range of consumer and commercial goods that play integral roles in safeguarding public health, promoting personal hygiene, boosting confidence and emotional wellbeing, maintaining comfortable homes and enhancing quality of life, as well as keeping the wheels of commerce and industry turning. Member companies include large global manufacturers as well as small dynamic Australian and family-owned businesses. A list of Accord member companies is available on our website: <http://accord.asn.au/about/members>.

Headline statistics<sup>1</sup> for Accord's economic footprint include:

- Accord's membership is approximately 100 companies (including Full Members and Associates)
- Collectively, Accord's Full Members:
  - contribute almost 9,000 full-time equivalent jobs
  - operate more than 129 offices, nationally
- Additionally, of Accord's Full Members
  - 62% manufacture in Australia
  - 78% export products overseas
  - 80% import products

Accord is pleased to see this step as part of the renewed APVMA. We support the proposed new model and the intended shift toward improved transparency for stakeholders, as well as a more collaborative and streamlined experience. This aligns with our shared goals, as reflected in our recent joint discussion.

We believe the success of the new model will depend on ensuring that Working Groups are established with clear objectives and rules, and that Members are selected using an appropriate criteria.

We support creating a diverse Working Group with members who can bring different perspectives, work collaboratively, are effective at conflict resolution, and able to contribute with constructive feedback.

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<sup>1</sup> Results from Accord's internal surveys

For the Working Group to be effective, there should be a link between the discussions on issues/improvements and practical aspects e.g. resources and timing. This is critical to delivering measurable outcomes.

With regard to the Registrants' Information update, we ask that there is a public space for questions and comments. This will assist in both greater engagement and a reduction in the number of separate requests to the APVMA, as they can be acknowledged at the update session.

We look forward to continued collaboration and successful implementation of this new engagement model.

Paul Wilton  
Senior Associate, Regulatory & Technical  
6 February 2025

5 February 2025

Australian Pesticides and Veterinary Medicines Authority

Via email: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)

Dear Australian Pesticides and Veterinary Medicines Authority,

**Re: Renewing the APVMA's engagement model**

Cancer Council Australia is the nation's peak non-government cancer control organisation. Cancer Council's Occupational and Environmental Cancer Committee (the Committee) includes members with national standing in relevant disciplines including epidemiology, molecular biology, occupational health, occupational hygiene, clinical oncology, and public health. We welcome the opportunity to provide feedback on *Renewing the APVMA's engagement model consultation paper*. This letter provides the Australian Pesticides and Veterinary Medicines Authority (APVMA) with the views of the Committee on the above matter.

Cancer Council commends the APVMA for committing to redesigning your stakeholder engagement model to enable increased participation, collaboration, and co-operation following a series of reviews and findings from the 2024 stakeholder and public survey. We note the findings from these reviews and survey which highlighted that many stakeholders found APVMA's engagement approach inconsistent, fragmented, and uncollaborative, as well as being unbalanced with respect to the stakeholder groups that the APVMA engaged with. Therefore, we support the APVMA's aim of delivering a more collaborative, transparent and dynamic experience for stakeholders, and a more streamlined consultation and engagement process. We support APVMA's commitment to be more accessible, proactive, and inclusive in your stakeholder engagement.

As a cancer control organisation, we believe that the purpose of chemical regulation is to protect human, animal, and environmental health. Therefore, our primary concern relates to the effect that pesticides and veterinary medicines may have on cancer in humans, and we recognise the importance of having an effective, robust, and trusted regulatory system for agricultural and veterinary chemicals. We believe that human health protection is fundamental to regulating agricultural and veterinary chemicals and this should be reflected in any stakeholder engagement model.

Cancer Council is concerned that the revised model does not go far enough to ensure the inclusion of stakeholders in the advisory group whose primary concern is the protection of human health. We note that within the renewed model, membership to the APVMA Advisory Group will be open to "... those NGOs with an interest in the statutory criteria outcomes (safety of people, animals, and the environment, efficacy, residues and trade)". However, there appear to be no stipulations on membership or requirements that the safety of people is weighted in the same way as the other areas (i.e., the safety of animals and the environment). Likewise, there is no information provided in the consultation paper regarding how members will be selected to cover each of the key areas should the APVMA receive more expressions of interest than the limit of 20 members.

Connected to this is the importance of addressing the intersection between regulation of pesticides and veterinary medicines with work health and safety. The highest risk in terms of pesticides is to people who actually use these substances in areas such as agriculture, horticulture and management of parks, gardens and sportsfields. The APVMA should work with the State and Territory Work Health and Safety regulators and public health departments to ensure that these people are appropriately protected.

Therefore, we strongly recommend that at least one position within the 20-member limit of the advisory group is reserved specifically for a member representing public health interests and another specifically for a member representing the interests of Work Health and Safety.

Thank you for considering our feedback.

Yours sincerely,



Megan Varlow  
Director, Cancer Control Policy



Professor Tim Driscoll  
Chair, Occupational and Environmental Cancer  
Committee

7 February 2025

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

Lodgement online: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)

Dear APVMA,

Redcap Solutions Pty Ltd is a well-established Sydney-based private consultancy specialising in regulatory affairs within the animal health and associated industries. The directors, Dr. Ruth Davis and Mr. Alan Pyefinch and their highly qualified team of associates have extensive experience in the animal health industry and the team have maintained an excellent and long-standing working relationship with APVMA over many years. Redcap Solutions represents many different clients from Australia and overseas, including large multi-national companies to small start-ups and individual entrepreneurs.

We are pleased to provide this submission in response to the APVMA Consultation paper titled 'Renewing the APVMA's engagement model'.

Thank you for the opportunity to comment on this review.

Please do not hesitate to contact us if we can be of further help.



Robyn Hammond, BScAgr (Hons), ADRBA  
Regulatory Consultant  
Redcap Solutions Pty Ltd

# 2024 RENEWING THE APVMA's ENGAGEMENT MODEL

## Overview

Over the past 20+ years, Redcap Solutions has engaged extensively with APVMA and has seen many changes in the approaches taken by regulator (and the department) to consultation and engagement with industry and other stakeholders. Previously, changes to engagement occurred organically according to APVMA projects and priorities, and outcomes were variable. The current proposal to establish a more structured approach based on stakeholder input is welcomed.

When APVMA was first created (as the National Registration Authority, or NRA) in 1996, industry worked closely with the regulator to establish the new regulatory system and to establish guidelines based on a mutual understanding of the legislative requirements, internationally accepted guidelines and data packages. The original manuals of requirements and guidelines (AgMORAG and VetMORAG) provided a common reference for preparation and regulatory assessment of registration dossiers until 2014. During that period, regular meetings, notices and seminars assisted in communicating APVMA expectations to industry and provided opportunities for discussion and resolution of challenges or misunderstandings which were impacting submission quality or acceptability.

Following the APVMA restructure and replacement of MORAG in 2014, resources available for engagement became limited as APVMA became more focussed on meeting assessment timeframes. After the initial rollout of the new APVMA website and online portal, consultation became less common. One notable exception was the 'Top 20' project which formed the basis of the current 'Guidance for applicants' which is a valuable resource for common application types. Since APVMA relocated to Armidale and the COVID-19 pandemic further limited opportunities for face-to-face meetings, APVMA engagement has been restricted to individual stakeholder meetings and ad-hoc attendance at meetings such as those held by Animal Medicines Australia.

Current efforts to deliver a more collaborative, transparent and dynamic engagement process for stakeholders are welcomed due to the potential to improve the efficiency of the regulatory system for all involved.

Comments regarding each level of the proposed new model are presented below.

### ***National Registration Scheme (NRS) Advisory Group***

Not for comment

### ***APVMA Advisory Group***

*(Representatives of registrants, users and suppliers of agvet chemicals and NGO's with a specific interest in statutory criteria of safety, efficacy, trade and labelling.)*

- It is unlikely that any one group of 20 people would have the required level of expertise and insight to cover the diverse focus range from compliance activities to future technologies. It would be preferable to grant membership to industry organisations, associations, and companies rather than individual memberships, to provide the opportunity for the most experienced representatives to attend meetings based on the agenda.

### ***Ag / Vet Chemical Registrants Working Group***

*(Industry organisations representing registrants or industry organisations who are registrants of agvet chemicals or permits.)*

- Two meetings per year would be the minimum required to identify and prioritise issues and projects but would not provide sufficient time to deliver solutions. The ability to create sub-groups, potentially calling on additional expertise, would be integral to the success of these Working Groups.

## 2024 RENEWING THE APVMA's ENGAGEMENT MODEL

- The consultation paper indicates Registrants Working Groups would be 'open to the industry associations representing registrants or industry organisations who are registrants of agvet chemicals or permits'. The wording suggests individuals such as registrants or consultants representing registrants would not be considered for membership. Working Groups should include members with hands-on knowledge of APVMA systems & processes in order to be able to provide insight and constructive feedback on any proposals.
- Membership should also not be limited to the small number of typically larger registrants represented by industry organisations as doing so would risk overlooking issues and challenges faced by smaller registrants and particularly overseas registrants represented by nominated agents and registration consultants.

### ***APVMA Registrants' Information Updates***

*(All registrants of ag or vet chemicals, no membership required.)*

- Provision of a formal structure for communication of APVMA updates to registrants is welcomed as a way of improving understanding and consistency of interpretation of APVMA published guidance.
- Registrant Information Updates should not be limited to virtual, webinar-style events, although that form of delivery could form part of a broader range of communication strategies.
  - Regular newsletters should also continue to be utilised as they allow APVMA to share messages that may not warrant a webinar, particularly updates to processes which need to be referenced at a future date.
  - Workshops should be reinstated as a source of two-way feedback regarding APVMA processes as they result in better understanding of common misconceptions and lead to better quality submissions and efficiencies for regulators and registrants.
  - APVMA previously held 'Information Sessions' which were an opportunity for APVMA to communicate current or planned approaches to assessment priorities or methodologies, described new information coming from international regulators (eg CODEX) and provided opportunities for interaction with APVMA staff and industry leaders. The meetings were extremely well attended, commonly attracting >250 attendees. Face-to-face meetings or conferences (such as the recent RACT 2025 conference) are invaluable as an opportunity for registrants to interact with the presenter as well as to hear how other registrants are managing common challenges within the system.
- The proposal for Registrants' Information Updates to be a 'one way provision of information' fails to recognise the importance of feedback in effective communication. Over the years there have been many instances where APVMA has designed and implemented a new process or policy only to find out that it didn't work as expected for all registrants, due to an unintended consequence or unforeseen complication. The engagement strategy should allow for two-way interaction between APVMA and registrants to assist in timely identification of the scale of any misunderstandings or problematic information.

Further general comments are as follows:

- The proposal for 4-year membership is too long for individual members. The consultation paper is unclear as it states that '*organisations* may apply for membership' but elsewhere it suggests that membership is granted to 'representatives' rather than organisations. Whilst 4-year membership may be appropriate for organisations who could then nominate representatives for specific meetings, a shorter membership would be less daunting for individuals who may not be able to commit to the group for that long.
- The proposed engagement model doesn't adequately address stakeholders other than registrants. Whilst representatives from users, NGO's, etc are included in policy-level discussions in the APVMA Advisory Group, there doesn't seem to be any provision for engagement at other levels, particularly



## 2024 RENEWING THE APVMA's ENGAGEMENT MODEL

regarding APVMA processes and activities. APVMA has previously been criticized for not communicating effectively with other stakeholder groups such as growers/users, veterinarians, researchers etc so the new model is an opportunity to include them.

# Reviewing the APVMA's engagement model

Consultation Paper



## 1. Introduction

CropLife Australia (CropLife) is the national peak industry organisation representing the agricultural chemical and plant biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers, formulators and suppliers of crop protection products (organic, synthetic and biologically based pesticides) and agricultural biotechnology innovations. CropLife’s membership is made up of both large and small, patent holding and generic, Australian and International companies. Accordingly, CropLife advocates for policy positions that deliver whole-of-industry and national benefit. However, our focus is specifically on an Australian agricultural sector and ensuring it remains internationally competitive through globally leading productivity and sustainability. Both of which are achieved through access to world-class innovation and products of the plant science sector.

The plant science industry contributes to the nation’s agricultural productivity and environmental sustainability, underpinning and ensuring food security through innovation in plant breeding and pesticides that protect crops against pests, weeds and disease. More than \$31 billion of the value of Australia’s agricultural production is directly attributable to the responsible use of crop protection products (CPPs), of which CropLife Australia’s members represent over 70 per cent of the products in the Australian market. The plant science industry itself directly employs thousands of people across the country.<sup>1</sup> CropLife Australia is a member of CropLife Asia and part of the CropLife International Federation of 91 CropLife national associations globally.

CropLife welcomes the opportunity to provide comments to the Consultation Paper for Renewing the APVMA’s engagement model and broadly supports the APVMA’s commitment to be more accessible, proactive, and inclusive in stakeholder engagement.

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<sup>1</sup> Deloitte Access Economics, ‘Economic Contribution of Crop Protection Products in Australia’, August 2023, <https://www.croplife.org.au/resources/reports/economic-contribution-of-crop-protection-products-in-australia/>.

## 2. Background

CropLife recognises that the APVMA has been subject to a period of significant disruption, resulting in changes in leadership and has experienced, firsthand, the vastly different approaches to stakeholder engagement through this period. The APVMA has legislated requirements to publicly consult on various regulatory matters<sup>2</sup>. It is important that these requirements remain focussed on specific technical issues and concerns that foster meaningful discussions with the developers, manufacturers, formulators and suppliers of agvet chemicals, as well as the “specific users” of them. These users are predominantly the farming sector. Any deliberation on renewing the APVMA’s model of engagement should commence with the understanding that this engagement mechanism is entirely appropriate, a finding confirmed by recent review of the APVMA.

CropLife acknowledges that the Clayton Utz APVMA Strategic Review correctly outlined that transparency, communication and engagement with stakeholders had been a regulatory priority for the APVMA at a public, organisational and executive level. However, after reviewing source literature cited by the report, complemented by the understanding that investigations by the Australian Public Service Commission found no wrongdoing, we hold concerns over the superficial nature of its conduct.

The self-reporting by groups that they feel “under-represented at best, and excluded at worst” through recent regulatory reviews should be considered against both the purpose of consultation by the regulator and the ideological premises held by specific groups. Ensuring the right response to these claims must consider:

- Whether they are seeking to engage with a science based regulatory decision of the APVMA.
- The scientific veracity of any views put forward.
- Whether they are seeking to promote policy arrangements for the regulation of pesticides and veterinary medicines that are inconsistent with the statutory settings provided to the APVMA by the Parliament.

As noted in the consultation paper, appropriately, stakeholders participating in consultative forums or any revamped engagement models cannot be involved in regulatory decisions. There also exist mechanisms for affected stakeholders to provide comment and data to chemical registration, approval and review processes. In a similar fashion, it should be recognised that the APVMA’s engagement mechanisms are not the appropriate fora for discussion around the public policy arrangements that underpin the Agvet Code and the other statutory settings of the APVMA.

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<sup>2</sup> [Detailed response to the final report on future structure and governance arrangements for the Australian Pesticides and Veterinary Medicines Authority](#)

CropLife looks forward to increased participation, collaboration, and co-operation with the regulator, supporting improved decision-making and outcomes delivered for the farmers, the agvet chemical industry and the Australian community.

### 3. Proposed Structure

Broadly, CropLife supports the breakout of the proposed engagement model into the tiered approach developed by the APVMA that is Strategic, Operational, and Informational. This engagement model will allow the regulator and regulated bodies to appropriately engage with the transparency and equity in the interactions demanded by stakeholders. CropLife particularly supports the inclusion of DAFF, DCCEEW, and the Department of Health and Aged care into this group as observers and expects that their attendance and participation will be constructive and collaborative. Further, this advisory group could benefit from the inclusion of Food Standards Australia and New Zealand (FSANZ) and the Office of the Gene Technology Regulator (OGTR).

However, we question the broad inclusion of non-government organisations with an interest in the statutory criteria outcomes in the Strategic advisory group. The importance of this group of stakeholders is not about the science based regulatory decision making, rather more about the policy framework within which the APVMA operates. The APVMA Advisory group must focus on scientific standards and operational process and procedure; importantly it should not be extended to include policy or strategic guidance beyond. Without extremely thorough vetting and curating of any nominated and admitted organisation, this group risks being hijacked and appropriated by activist groups who are anti-chemistry and anti-science. This risk should be managed through the establishment of clear eligibility and selection criteria to ensure members possess relevant skillsets and experience required to support the APVMA's administration of its regulatory responsibilities.

In the interest of transparency and communication it would be more appropriate for representatives of these organizations to be included in regularly scheduled regulatory information updates. This would allow the APVMA to communicate and consult on current work programs across its legislative remit of registration including monitoring and review, and compliance and enforcement. In this manner, the APVMA can better communicate with and inform stakeholders to better understand what is happening across the APVMA.

### *New membership selection criteria*

CropLife supports the proposal that current members of the APVMA Consultative and Agvet Users Forum will be invited to participate in either the advisory or working groups. Critical to the value of these groups is ensuring that the size of each remains manageable and of a quantity that enables effective and constructive communication. The strategic advisory group should therefore be comprised of National Peak Bodies of manufacturers and users, relevant tangential regulators and the DAFF.

The proposed configuration of the Ag Chemical Registrants and Vet Chemical Registrants working groups are also supported. While the broader issues regarding the regulation of pesticides and animal medicines are shared across these sectors, the specifics of the regulation and use of these products will be far better served by relevant engagement and consultation specific to these disparate groups, who are nevertheless bound by the same legislation.

As stated above, CropLife represents the developers, manufacturers, formulators and suppliers of over 70 per cent of the crop protection products in the Australian market, comprising all of the developers of innovative and novel chemistries and technologies. As such, CropLife participation in these advisory and working groups is contingent upon all of the admitted and nominated participants recognizing the primacy of Section 1A of the Agvet code, most notably subsection 1:

*[T]he present and future economic viability and competitiveness of primary industry which relies on access to chemical products and their constituents; and ... are essential for the well-being of the economy and require a system for regulating chemical products and their constituents that is cost effective, efficient, predictable, adaptive and responsive.*

Further to enabling constructive and productive consultation with and between regulators, users, the regulated industries and community at large is a formal mechanism to remove members or entities who are obstructionary, divisive and counterproductive. Criteria for the cessation of an appointment could include, but not limited to:

- the member has failed to act according to the Committee's Terms of Reference;
- the member has failed to comply with their obligations under the Confidentiality Agreement;
- a change in the member's affiliations and interests results in a direct conflict of interest that prevents participation;
- the member has missed three consecutive meetings of the Committee without informing the Secretariat of the reason(s); or,
- the member has acted in a way that jeopardizes the integrity of the Committee.



### *Funding and resourcing*

In accordance with guidance principles developed in the Department of Finance Resource Management Guide (RMG) 302 and CropLife's previous submissions to the Cost Recovery Implementation Statement (CRIS) and Department of Treasury,<sup>3</sup> some costs are not appropriate to be charged to the regulated industry. This includes costs which are demonstrably in the public good.

Examples of costs that should not be borne by the farming sector, through the fees and levy mechanism include:

- Costs related to activities, outputs or business processes not delivered to individuals or organisations to be charged.
- Policy development of new or amended regulatory activities.
- The development and promulgation of general advisory material for the industry.

Given that this proposed new Engagement Model will require significant time and resourcing of the APVMA CEO as well as senior executive and technical experts, these costs should not be borne by resource derived from fees and levy. Rather, these must be budget funded through appropriation.

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<sup>3</sup> [Stage 2 – Develop charging model | Department of Finance](#)

## 4. Conclusion

CropLife and our member companies welcome the opportunity to engage with the APVMA, and key farming organisations to work constructively with the Federal Government to develop and participated in an efficient, effective, and truly consultative engagement model. Because the APVMA's key obligation is to make scientific regulatory decisions, the potential enabling unscientific activist positions to undermine the benefits of scientific endeavours must not be recognised, and steps taken to prevent such. A strong, independent, science and risk based regulatory system that ensures Australia's farmers have timely access to the latest innovative crop protection products so they can continue to farm productively and sustainably must be transparent and much of the proposed Model will help deliver these outcomes.





## **SUBMISSION**

***Renewing the APVMA engagement model – Consultation paper.***

PO Box 370  
Braidwood NSW 2662

Submissions due: Friday 7 February 2025 (with GPA provided an extension until 12 February).

## Terms of Reference

On 12 December 2024, the APVMA called for submissions on its consultation paper *Renewing the APVMA's engagement model* which outlines a revised approach for its stakeholder engagement forums.

The APVMA's proposed model is based on recommendations from independent reviews, the findings of its 2024 stakeholder and public survey, and a review of engagement practices used by the APVMA and comparable organisations.

The overall goal of the reforms is to deliver a more collaborative, transparent and dynamic experience for stakeholders. Consultation closes at 5pm Friday 7 February 2025 (with GPA provided an extension until 12 February).

### **Grain Producers Australia's response: *Renewing the APVMA engagement model*.**

Thank you for providing Grain Producers Australia (GPA) with the opportunity to submit our members' views on the *Renewing the APVMA engagement model – Consultation paper*.

GPA represents the interests of direct grower members, state farming members and an estimated 24,500 levy-paying grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia. GPA develops national policy to support outcomes and advocacy for Australian grain producers which helps deliver a more profitable, sustainable and globally competitive grains industry. Australian growers also contribute to the economic strength of their communities and the national economy, with an industry valued at more than \$31 billion in 2022-23. The 2023/24 GRDC Annual Report also shows the national grains industry's share of gross agricultural production was 26.5 per cent of the \$81.8b total in that prior; equating to \$21.677 billion in value derived from national grain production of 51 million tonnes, with 43.7 m/t of this volume exported. For the same reporting period, the value of grain exported was \$21.8 billion.

GPA's roles are legitimised under federal legislation, with responsibilities representing all levy-paying growers on vital industry matters, to support delivery of shared economic, environmental and community benefits. Grain producers contribute 1.02 per cent of their net crop sales toward compulsory levies, to fund the Grains Research and Development Corporation (GRDC) for RD&E, Plant Health Australia (PHA) membership to provide biosecurity prevention and eradication management, and the National Residue Survey (NRS) testing, for grain quality and market access. Of that 1.02pc, the vast majority is allocated to the GRDC(0.99pc), and then PHA (0.01pc), NRS (0.015pc) and the emergency plant protection response (0.005pc).

### **Strategic Role of GPA Pesticides and Technology Committee**

The GPA Pesticides and Technology Committee is focused on ensuring growers can maintain cost-effective access to crop protection chemicals and other innovations, including through a focused, efficient and consultative APVMA. Members of GPA's Pesticides and Technology Committee are drawn from GPA's State Farming Organisation members – the State grain producer member representatives who are also active agvet chemical users across Australia. These State representatives are therefore also actively engaged on local issues of direct relevance to these broader industry/policy matters.

GPA helped establish, and has been an active contributor to, the APVMA Users' Forum for many years and engages with the Authority directly, on a regular basis. This direct engagement includes from the perspective of being a Permit holder (GPA holds nearly 50 APVMA Permits on an industry-good basis for critical grain crop protection uses). [HERE](#) GPA plays an important role assisting the coordination, management and delivery of these industry minor use Permits, as assessed/approved by the APVMA, which help grain producers control various pests, weeds and diseases more effectively. GPA's coordination role in the application of these minor use and emergency use Permits includes formal engagement with other key industry stakeholders, with necessary expertise. This engagement process is supported by input of the direct experiences of end users/producers, provided through the GPA's Pesticides and Technology Committee. These permits give growers timely and strategic access to the tools they need to manage damaging pests, weeds and diseases, to help ensure their farming

businesses remain profitable and sustainable. GPA's coordination role also supports other vital matters, relevant to the needs and experiences of growers, and the delivery of other shared benefits, for maintaining grain production/product integrity and market access. As the key representative organisation for Australia's largest plant-based industry – the Australian grains industry – GPA has been a leading voice in calling for reforms to Australia's agvet chemical framework to ensure growers have timely access to world-leading technology and to enhance product stewardship. GPA does not support the duplication of grain producers' views on these matters, and others concerning national representation and development of policy and advocacy.

### ***GPA's engagement in enhancing the Australia agvet chemical framework***

The APVMA should be commended for striving to enhance its engagement with key stakeholders with an interest in the responsible use of agvet chemicals in Australia. GPA recognises the genuine intent of the APVMA around stakeholder engagement over the years, including the User Forum, however, also sees opportunities for the Authority to enhance the consistency, comprehensiveness and mutuality of its engagement approach.

GPA broadly supports the principles of the proposed new engagement model, including the focus on enabling quality multi-party collaboration at strategic and operational levels. The Consultation paper notes the core goal of the new engagement model is *"enabling broader participation from various sectors and interest groups"*.

A key to ensuring the impact of the new engagement model, in particularly the APVMA Advisory Group and Ag and Vet Chemicals Registrant Groups, will be to strike the right balance between ensuring a comprehensive breadth of stakeholder perspectives are engaged, while also ensuring each forum remains of a size that enables genuine two-way dialogue and collaboration to deliver better outcomes.

### ***Ensuring the renewed model delivers a more collaborative, transparent & dynamic experience.***

The APVMA User Forum has generally involved around 20 invitees from the breadth of stakeholder groups representing different users of APVMA-regulated products. With the new APVMA Advisory Group proposed to include a total of 20 members, representing a much wider spectrum of stakeholders (including registrants, users and non-governmental organisations), the new model, as proposed, will reduce the number and diversity of user perspectives contributing directly on strategic matters critical to the future effectiveness of the APVMA and the wider agvet chemical framework. This is a concerning aspect of the proposal.

If not carefully designed, these proposed changes risk leading to a less open APVMA, exacerbating the concerns identified in the Independent Reviews around many stakeholder groups feeling *"under-represented at best, and excluded at worst"* (DAWE 2021:66).

If the interrelationships between the Advisory Group/Working Groups, the APVMA and the wider network of stakeholders with an interest and 'right' to have a say on the strategic direction of the agvet regulatory framework, are not carefully designed, then there is a risk the new model may lead to a less open, less transparent APVMA, guided by a narrower range of stakeholder perspectives (particularly in terms of users). To avert this risk, it will be critical that:

- representatives selected to join proposed groups, particularly the APVMA Advisory Group, are *"truly representative"* and from organisations with strong, credible and established connections to *"those impacted by agvet chemical use"* – GPA achieves this through legitimate member engagement and governance comprising GPA Policy Council and GPA Pesticides and Technology Committee comprising farmer/user representatives from the major grain producing regions of Australia.
- The new Advisory Group does not become the sole source of stakeholder input on strategic matters, and clear guidelines are developed to identify when/where the APVMA will initiate wider/open stakeholder consultation on critical questions relating to the Authority's legislative responsibilities or current and future agvet risks and opportunities.

- The APVMA retains the ability and willingness to further evolve the new engagement model, potentially relatively early in the first 4-year cycle, if the new approach is proving less open and/or exclusionary of important stakeholder perspectives (eg: types of users).
- The APVMA Advisory Group and Registrant Working Groups harness the opportunity to establish sub-groups in cases where more detailed strategic discussions need to occur on key aspects of the agvet system. GPA believes that the future direction of the Permits system is a critical topic that should be the focus of a sub-group comprising of relevant industry organisations with a direct interest and legitimate role, in the Permit system (such as GPA). A sub-group should also be formed to fast track a discussion on how the APVMA can evolve its risk assessment approaches to better consider the benefits of new technologies (particularly precision application systems) in reducing real world risks in product application.
- The Registrant Working Groups need to include a balance of representatives with a focus on registrants, and importantly Permit holders, recognising the different motivations, challenges and requirements facing these two distinct groups of regulated parties.
- Any representatives of non-governmental organisations need to be genuine representatives of credible organisations, as opposed to outspoken activists with ideological and/or other agendas. Given the term “*thought leader*” is not well defined in the Australia politico-regulatory lexicon, it is critical any “community leader” considered for inclusion on the Advisory Group has an extended and credible track record of constructively contributing to Australian public discourse in way that help achieve the overarching Objects outlined in Section 1A of the *Agricultural and Veterinary Chemicals Code Act 1994*.
- As foreshadowed in the Structure and Governance element of the paper, constructive and professional engagement is a non-negotiable condition of participation. There should be clear mechanisms in place to promptly address non-constructive or anti-social behaviour, including a clear process for standing down representatives not meeting the agreed terms of engagement.

### ***Enhancing transparency and accessibility***

The publication of comprehensive meeting summaries from past APVMA User Forums on the Authority’s website has been valuable to assist members of the Forum in sharing key points from discussions, and in improve the broader transparency and visibility of this important dialogue. This transparency standard need to be maintained or enhanced under any renewed approach.

There is no detail in the proposed Consultation paper as to how the APVMA intends to ensure the Advisory Group and Registrant Working Groups remain transparent processes offering wider stakeholders a heads up on the key topics that will be discussed on these Group’s agendas, an understanding of deliberations, and feedback on how outcomes will be advanced. There is a risk that if these processes become opaque and/or exclusive to those on the groups, then the overall intent of the renewed approach will be undermined.

GPA is concerned about the Timeframe deliverables outlined in the Consultation Paper, in particular the short period between when the APVMA will receive of submissions and the proposed date for the approach to be finalised. The issues identified in GPA’s submission, and no doubt the considered submissions of other stakeholders, will require careful assessment and the finer details of the design of the new engagement model will be critical to its ultimate success in achieving improving outcomes for all involved. GPA encourages the APVMA to ensure these factors are properly considered before moving ahead with any reforms.

### **GPA Contact**

Please don’t hesitate to contact GPA if you would like to discuss any of the aspects of this submission.

Colin Bettles | Chief Executive

## GPA's Representative Roles and Responsibilities

Grain Producers Australia represents the interests of an estimated 24,500 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the economic strength of their communities. GPA advocates national policy and outcomes to benefit grain producers and help deliver a more profitable, sustainable and globally competitive Australian grains industry.

GPA's objectives are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

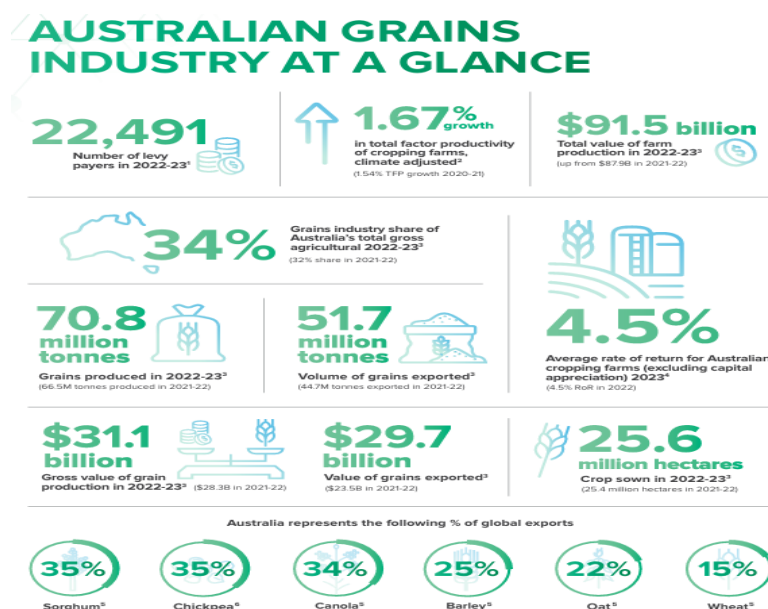
As a not-for-profit company limited by guarantee, GPA is governed by a board that's elected by producer members, representing the major grain producing regions. GPA's membership comprises direct producer members and the producer members of the Grains Councils of State Farming Organisations. Elected leaders of these groups – backed by professional staff – represent the interests of their grain producer members, to the GPA Policy Council.

GPA's State Members include:

- AgForce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers Grains Council
- WA Grains Group

These legitimate representative processes also engages grain producers to advocate their views on policy Sub-Committees, such as GPA Biosecurity Committee and GPA Pesticides and Technology Sub-Committee.

GPA's responsibilities representing the interests of Australia's levy-paying grain producers are legitimised under federal legislation. This includes; Plant Health Australia as a signatory to the Emergency Pest Plant Response Deed (EPPRD); as a joint Representative Organisation responsible for overseeing the Grains Research and Development Corporation's performance and strategic investment, with matching Federal Government funding, in RD&E activities, under the PIRD Act; and managing the risk of chemical residues and environmental contaminants in grain products, to help facilitate access to domestic and export markets and protect product integrity and export reputation, via the National Residue Survey.



Further information: <https://www.grainproducers.com.au/>



Animal Medicines Australia  
ABN 76 116 948 344 | ACN 116 948 344  
18 National Circuit  
Barton ACT 2600, Australia  
P: +61 2 6257 9022  
[animalmedicinesaustralia.org.au](http://animalmedicinesaustralia.org.au)

7 February 2025

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

By email only: [engagement@apvma.gov.au](mailto: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 guidelines<sup>1</sup> and promotes transparent, open, collaborative, meaningful and regular dialogue between the regulator and the regulated community.

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<sup>1</sup> [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.



15 January 2025

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

Via email: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)

To whom it may concern,

**Re: Renewing the APVMA's engagement model**

GrainGrowers is a national organisation working to enhance the profitability and sustainability of Australian grain farmers. GrainGrowers achieves this through focus areas of policy and advocacy, grower engagement, thought leadership and active investment in future focused activities for all growers. Australian growers are at the heart of all that GrainGrowers does and the focus of all work. The grains industry is a regional Australian powerhouse with 22,500 farm businesses growing around 50 million tonnes<sup>1</sup> of grains, oilseeds and pulses each year for domestic and global customers.

Australia has an effective agricultural chemical regulatory system which prioritises safety and environmental well-being. The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the national regulator for pesticides and veterinary medicines and is globally recognised for its approach as an evidence-based regulator. Australian agricultural industries support the risk-based regulatory framework that is currently in place, and the reliance on science-based criteria to ensure our industry has access to chemicals that are safe and effective. A strong regulatory system helps to underpin the Australian public's confidence in farmers and underpins our reputation among international trading partners as a supplier of safe and high-quality produce.

The paper outlining the proposal to renew the APVMA's engagement model only focuses on the committee structures, however GrainGrowers would urge APVMA to take a broader review of its communication and engagement strategy. In responding to the proposed engagement model GrainGrowers has sought to highlight the importance of engaging with users, the need to actively communicate with the broader community and improvements in the proposed engagement model.

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<sup>1</sup> Based on the 5-year average to 2022/23 (ABARES)

## **Importance of engagement with agricultural chemical users**

The recent consultation on the proposed APVMA decision regarding paraquat and diquat highlights the need to have a clear and comprehensive engagement strategy, working proactively with and responding stakeholders. This is vital to ensure that the APVMA avoids confusion relating to its decisions and processes and that stakeholder confidence in the regulatory system is maintained.

Reflecting on the recent example of the proposed APVMA decision regarding paraquat and diquat, there was a need to clearly communicate the proposed decision to stakeholders, providing background and explanation to ensure chemical users understood the processes leading to these decisions and their impacts. However, the proposed decision was initially communicated using highly technical language and the extent of its impact on users was not fully understood.

As an example, the communication material initially provided by the APVMA made it difficult for growers to understand the rationale and impact of the proposed regulatory decision. A useful, plain English, overview of the decision was published on the APVMA website on 30 August 2024<sup>2</sup>, a month after the report was initially gazetted on 30 July 2024<sup>3</sup>.

This highlights the opportunity to better engage with user groups to design communication materials that can better address information needs, as well as manage engagement to ensure questions and concerns are addressed. The APVMA Advisory group proposed in the discussion paper may be a useful forum to highlight upcoming regulatory decisions and seek advice on appropriate communication. This function should be considered as part of the groups' terms of reference. It is important to stress that the APVMA should also maintain and engage with a broad network of stakeholder groups in developing and implementing an engagement strategy, as by their nature, an advisory group will only represent a limited number of stakeholders and perspectives.

## **Critical need for engagement with the broader community**

It is important that the APVMA recognises the important role it plays in maintaining community and user trust in chemical regulation and safe handling of chemicals. AgriFutures, along with the Grains Research and Development Corporation, have invested in research to understand drivers of community trust in Australia's rural industries<sup>4</sup>. Community trust in rural industries is related to several critical issues, with chemical use and regulation identified among them.

Chemical use represents a concern for many Australians, particularly with respect to food safety. The more concern the Australian community has around chemical use in rural industries, the less they trust these. Path analysis research identified that confidence in the regulatory systems was an important factor for rural industries in maintaining levels of trust in the community<sup>5</sup>. Community trust in the rural industries is linked to community confidence in regulatory frameworks and that regulatory obligations were being met. It is important that

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<sup>2</sup> [Simplified overview "Understanding the proposed regulatory decision for paraquat" \(30 August 2024\) APVMA](#)

<sup>3</sup> [Notice under section 34AB of the Agricultural and Veterinary Chemicals Code \(Paraquat and diquat reconsideration\) APVMA Special Gazette \(30 July 2024\)](#)

<sup>4</sup> [Community Trust in Rural Industries \(AgriFutures\), Community Trust in Grains \(2024\) GRDC](#)

<sup>5</sup> [Community Trust in Rural Industries, Year Three National Survey \(2022\) AgriFutures](#)

the APVMA considers the links between its work and addressing community sentiment and expectations regarding chemical regulation.

In its strategy for engagement, it is important that the APVMA considers communication with the broader community as well as interest groups, to ensure there is an understanding around how their interests and expectations are being met. The recent example of the proposed APVMA decision regarding paraquat and diquat highlights the broad community interest in chemical use and regulation, and potential risk to trust and confidence in the regulator if communication and engagement is not actively managed. The current engagement model does not refer to how the APVMA intends to engage with the broader community and provide a clear narrative regarding how the regulatory system operates and its levels of performance.

### **Comments on the proposed engagement model**

The engagement model in the consultation paper 'Renewing the APVMA's engagement model' proposes a series of engagement groups to improve transparency and equity in the interactions across stakeholders. The APVMA has indicated that the engagement model has been developed to ensure stakeholders can engage with the APVMA in a way that is transparent (so stakeholders can understand what is happening across APVMA) and efficient (so their time is used effectively). As an organisation that works with chemical users GrainGrowers will restrict comments to the strategic advisory group, which is proposed as a mechanism to engage with user stakeholders.

As currently proposed the APVMA advisory group would include representatives of registrants and users of agvet chemicals as well as non-government organisations with an interest in the statutory criteria outcomes and be limited to 20 members. The proposed membership has a very broad set of interests, and our experience in dealing with consultative groups is that there may be difficulties managing expectations, setting a clear agenda and articulating a purpose with such a wide-ranging group, leading to frustrations and lack of outcomes. A more effective structure may be multiple groups with the membership of each focused on shared interests that match expertise and experience. For example, groups could be focused on chemical user issues (efficacy, residues, trade), environment and human health.

GrainGrowers supports the need for a clear and transparent process for identifying membership of the advisory group, along with a clear term of appointment and criteria for selection. The consultation paper does not provide any information as to the proposed mix of representative interests that would form the APVMA advisory groups, and the extent to which it would be able to represent the wide-ranging perspectives of chemical users from different industries.

It is unclear what the responsibilities of the advisory group members will be, and the extent they would be involved in representing and providing a conduit for consultation with their respective industry or interest group. Also, if they will be involved in providing technical or professional advice regarding the design or delivery of APVMA processes. It is important that the APVMA advisory group has a clear scope of operation and well-defined outcomes so that its membership can be selected appropriately.

GrainGrowers would welcome the opportunity to discuss these issues further and would welcome the opportunity to speak to the APVMA regarding the issues raised.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Z Whale', with a stylized, cursive script.

**Zachary Whale**  
**General Manager, Policy and Advocacy**  
**GrainGrowers**





COTTON  
AUSTRALIA



# Renewing the APVMA's engagement model submission

Submission prepared by Doug McCollum

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## ABOUT COTTON AUSTRALIA

Cotton Australia is the peak body for Australia's cotton growers, representing up to 1,500 cotton farms mainly in New South Wales and Queensland but also in the Northern Territory and Western Australia. Cotton Australia works with growers and stakeholders to ensure the Australian cotton industry remains viable.

Cotton Australia supports the Australian cotton industry to be globally competitive, sustainable and valued by the community. It drives the industry's strategic direction, retains a strong focus on research and development, promotes strength of the industry, manages sustainability reporting and implements policy objectives.



## 1. Executive summary

Cotton Australia welcomes the opportunity to comment on the consultation paper published in December 2024 regarding renewing the APVMA's engagement model. This submission is provided on behalf of the Australian cotton industry. We provide this submission without prejudice to any submissions made by associated industries or individual members of the cotton industry.

Cotton Australia is pleased to support the proposal which we believe will lead to more transparency and efficiency in the regulatory process for agricultural chemicals. It is likely to provide greater access to the APVMA for industry bodies such as ourselves, and through us will provide the opportunity for input from our growers, who are the end-users of the agricultural chemicals that are regulated by the APVMA.

The APVMA has a challenging job to balance the needs of agricultural chemical users and registrants with community expectations around the appropriate regulations to protect consumers and the environment. By engaging broadly with stakeholders, we expect the APVMA to be better informed about the needs of all interested parties and consequently in a position to provide better regulatory outcomes for the whole community. And by increasing the transparency of their strategies and work programs it will ensure industry bodies such as ourselves are better informed when we submit our own regulatory applications to the APVMA.

## 2. Recommendations

- The APVMA should establish the new engagement model as proposed in the consultation paper.
- The structure consisting of the National Registration Scheme Advisory Group, APVMA Advisory Group, Ag Chemical Registrants Working Group, Vet Chemical Registrants Working Group and APVMA registrants information updates are supported.
- The scope, focus and frequency of these groups as proposed is supported.
- The membership criteria and admission process for new members is broadly supported but we suggest that implementing a procedure to allow for broader input into the application and admission of new members would be a positive addition for consideration.



### 3. Submission response

Cotton Australia is responsible for representing the cotton industry in matters relating to regulation of agricultural chemicals. The cotton industry has a proud history in upholding the highest standards in the responsible use of agricultural chemicals and we have enjoyed positive relationships with the various stakeholders in this sector including registrants, research providers, advisers and the various regulators in the industry.

We welcome the proposed new engagement model by the APVMA, particularly as it seeks to improve transparency, consistency and collaboration across advisory and working groups. Our past interactions with the APVMA have been positive but we would like to develop a closer working relationship in future. This will ensure that we are optimizing the efforts of each party as well as achieving the best outcomes for our industry and the broader community.

The critical aspects of an effective engagement model are:

1. The participants in the engagement have the appropriate skills and knowledge to contribute meaningfully to the process.
2. The process is designed to give ample opportunity for input from the stakeholders involved.
3. Feedback loops are in place to ensure that outcomes are communicated appropriately through the engagement process.

The proposal provided is high level and does not address all these criteria in detail, but on face value it provides the opportunity to develop an effective process for engagement with all relevant stakeholders. We are confident that it will be an improvement in the current engagement strategy and provided that the right stakeholders are involved in the various advisory groups then it will contribute to better outcomes for all parties involved with agricultural chemical regulation.

The proposed structure of the engagement model is supported as it balances the stated levels of engagement with appropriate membership criteria assigned to the levels:

- Strategic
- Operational
- Informational

Cotton Australia would welcome the opportunity to join the strategic engagement group (APVMA Advisory Group) as it would provide us with better insights into the plans and objectives of the APVMA regarding various aspects of agricultural chemical regulation. In particular, we believe this would assist us to be more effective and targeted in our submissions for Emergency Use Permits and Minor Use Permits on behalf of our growers, and it would also allow us to be better informed in our discussions with registrants regarding new product introductions and label extensions that they are undertaking.

It is becoming more difficult for registrants to justify the resources required to seek registration for products in cotton as it is not seen as an attractive commercial opportunity for them. This is the downside of our success in implementing Integrated Pest Management strategies and the resultant decline in chemical usage in our industry. We still require product registrations for the various fungicides, insecticides, plant growth regulators and herbicides used by our growers and we will require new products to become available as our production system changes and as older products are withdrawn from the market. It is likely that we will become increasingly reliant on Minor Use Permits even though we are considered to be a major crop from a regulatory perspective. We are keen to ensure that we are strategically aligned with the APVMA in matters such as this and that we can continue to allow our growers to operate their businesses effectively while managing the regulatory requirements for product access in the most efficient and logical way possible.

The working groups representing Ag Chemical and Vet Chemical registrants are an appropriate element of the proposed engagement model, reflecting the slightly different relationship that the APVMA will have with registrants as opposed to representatives of agricultural chemical users and other peripheral stakeholders. This group could focus on more operational aspects of the registration process and deal with specific commercial issues that form part of the regulatory process. Cotton Australia supports the establishment of these groups as part of the new engagement model.

The proposal to add an engagement level to provide information updates to all stakeholders in the regulatory process is also a positive step and Cotton Australia is happy to support this. It is appropriate to provide a forum that provides current and relevant information but is not directing APVMA policy in any way. This provides the opportunity to engage widely in the regulatory community while ensuring that input into the regulatory procedure is obtained through representatives of relevant organisations.

We would suggest that assessing the suitability of interested parties for membership of the various groups could be broadened beyond just the consideration of the APVMA. The existing members of the group could also be involved in decisions regarding the admission of new members, which would provide even better accountability and ownership within the existing stakeholders. This may need to be balanced in a way that ensures these decisions are not dictated by commercial interests, but it would provide a positive aspect for the makeup of these advisory groups. The process may involve the APVMA making the initial assessment and their recommendation to the group about whether they believe a new member should be admitted. This could then be endorsed by the group if they agreed or debated in the context of membership criteria as set out in the establishment of each advisory group.

Cotton Australia looks forward to the implementation of a new stakeholder engagement model for the APVMA and we hope to play an active role in the process once it is established. We are available for further input into the consultation process if required.





COTTON  
AUSTRALIA

As Leader of the NSW Nationals and NSW Shadow Minister for Agriculture, I welcome the opportunity to provide feedback on the APVMA's revised stakeholder engagement model.

APVMA has an important job regulating agricultural chemicals, but past reviews have shown issues with consultation. Many in the industry have seen the process as inconsistent and have found it difficult to voice their concerns.

There are also gaps in representation and how APVMA interacts with different groups; particularly grassroots agriculture groups.

A stronger engagement model will provide clearer paths for industry input, better access to critical information and ensure decisions are based on sound local data and practical experience.

Establishing consultative committees with grassroots agricultural bodies will help improve communication and guide regulatory decisions. These committees will need to provide feedback on extending notice periods for chemical reviews, allowing more time for research where needed.

Consultative committees will only be effective if they are made up of representatives with real experience in agriculture.

Grassroots industry groups understand the practical challenges farmers face and can provide insights grounded in local knowledge.

These committees should not be dominated by activist groups that lack direct involvement in farming, as this risks shifting the focus away from evidence-based decision-making.

Ensuring committees are driven by those who work with these chemicals on a daily basis will lead to better regulatory outcomes that balance safety, productivity and environmental management.

Regulatory decisions must be based on the best scientific evidence available that reflects Australian conditions.

Relying too heavily on international data risks overlooking the realities of local farming systems, soil types, and climate.

Farmers and industry experts must have a voice in these discussions to ensure practical, science-based outcomes.

The NSW Nationals support changes that improve industry engagement with the APVMA and ensure decisions are suited to Australian conditions.

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Hello Engagement team

DTS Regulatory Consultants (DTS) supports the increased stakeholder consultation proposal. I note that for non-government stakeholders, it doesn't involve the chemical review program directly, where increased stakeholder engagement with respect to the user industry groups needs to increase during any chemical review nomination and or scoping activities to ensure the best user information available is obtained at this early stage of the process.

I note the reference to 'representatives of registrants' in the proposal and would like to advise that we consider DTS as a member of this group.

DTS represent 136 companies via the APVMA portal and work for many more that have not yet made APVMA applications and or have products that we have evaluated as not requiring APVMA registration but still are captured by the AgVet Code Act and related legislation.

DTS does not belong to any chemical industry group as the majority of our clients would not be welcome in these groups. There are few other relevant industry groups and as such most DTS clients are not represented to the APVMA, other than via DTS.

In addition, there is no representative consultants group and neither is there likely to be as it is a disparate group, unlikely to work together in an equally collaborative manner.

As such I consider that DTS offers a significant representation of stakeholders to the APVMA and should be considered for the APVMA Advisory Group and relevant working groups.

Kind regards  
Gavin

Gavin Hall  
Chief Operations Officer  
<https://www.dtsreg.com.au/>

7 February 2025

Engagement and Communications  
Australian Pesticides and Veterinary Medicines Authority  
**Via: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)**

### **Renewing the APVMA's engagement model**

The Western Australian Farmers Federation Inc (**WAFarmers**) appreciates the opportunity to provide this submission to the Australian Pesticides and Veterinary Medicines Authority's (**APVMA**) consultation on *Renewing the APVMA's engagement model*.

WAFarmers is the largest peak body for broadacre farmers in Western Australia, representing over 1,000 farming businesses across the grains, livestock and dairy industries. We recognise the critical role that agvet chemicals and veterinary medicines play in safeguarding and enhancing agricultural productivity, ensuring pest and disease control and maintaining animal health.

Farmers rely on the APVMA as a world-leading, independent, science-based regulator of agvet chemicals to provide clear guidance on product safety and usage. As such, we have a significant interest in ensuring that the APVMA's regulatory processes are **independent, science-based** and **efficient**.

### **Key principles for APVMA's engagement model**

WAFarmers believes that the effectiveness of APVMA's regulatory framework depends on adherence to the following principles:

1. **Regulatory independence** – Decisions of the APVMA must be independent of political, industry, and activist pressures.
2. **Scientific rigour** – Decisions must be based on sound scientific methodology and evidence-based assessments. A risk-based approach (not one based on hazard alone) should be applied.
3. **Efficiency and transparency** – Processes should be clear, timely and effectively communicated.

WAFarmers supports renewed engagement that enhances these principles but remains cautious of any measures that could undermine them.

### **Support for improving stakeholder engagement**

The APVMA consultation paper acknowledges that many stakeholders found its engagement approach to be **inconsistent, fragmented and one-way**. WAFarmers welcomes reforms aimed at improving transparency, coordination and responsiveness.

To that extent, WAFarmers supports the renewal of the APVMA's stakeholder engagement model and will continue to provide feedback through our national peak industry councils. We also emphasise the need for the APVMA to strengthen engagement with **primary producer organisations** like WAFarmers, ensuring that the voices of those directly impacted by regulatory decisions are heard.





### Concerns over advisory group composition

While public trust and engagement are important, **WAFarmers urges the APVMA to avoid the inclusion of activist groups** whose objectives are ideological rather than **science-based**.

We are concerned that the inclusion of such groups could derail constructive discussions rather than contribute meaningfully to the discharge of the APVMA's legislative responsibilities. This will lead to further delay and cost which will ultimately be borne by agvet users. We are also concerned that it will lead to a consideration of factors outside the remit of the APVMA, leading to the politicisation of this process as has occurred in Europe. This would undermine all three of our key principles stated above.

Instead, WAFarmers proposes clear eligibility criteria for advisory group participation, requiring that members demonstrate expertise in **agriculture, science or regulatory policy**.

### Structural reforms – specific feedback

1. **Support for separate working groups**

WAFarmers supports the APVMA's proposal to **divide the AgVet Users Forum into two distinct working groups** for agricultural chemical registrants and veterinary chemical registrants. This will ensure that discussions remain focused and relevant to each sector.

2. **Industry representation in advisory groups**

APVMA must ensure that peak agricultural bodies **are given direct representation** in strategic advisory groups, reflecting the practical realities of Australian farming.

3. **Public awareness and transparency**

WAFarmers encourages the APVMA to take a **proactive role in public education**, ensuring that **science-based regulatory decisions** are effectively communicated to prevent misinformation.

4. **Registrants' information updates forum**

WAFarmers supports the establishment of the **Registrants' information updates forum** as a means of enhancing transparency and fostering public understanding of agvet chemical regulation.

### Conclusion

WAFarmers appreciates the opportunity to provide input into this consultation and looks forward to APVMA's efforts to improve stakeholder engagement while maintaining its role as an independent, science-driven regulator.

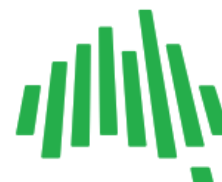
### Contact Details

**Trevor Whittington**  
CEO, WAFarmers

Address: Unit 3, 14 Brodie Hall Drive, Bentley WA 6102 // PO Box: PO Box 1105, Bentley DC WA 6983

Tel: (08) 9486 2100 // Email: [reception@wafarmers.org.au](mailto:reception@wafarmers.org.au)

[www.wafarmers.org.au](http://www.wafarmers.org.au)



7 February 2025

Engagement and Communications  
Australian Pesticides and Veterinary Medicines Authority

Via e-mail: [engagement@apvma.gov.au](mailto:engagement@apvma.gov.au)

**Re: Renewing the APVMA's engagement model**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Australian Pesticides and Veterinary Medicine Authority's (the APVMA's) consultation on *Renewing the APVMA's engagement model*.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Agricultural chemicals and veterinary medicines (agvet chemicals) are essential tools that help Australian farmers control pests, weeds, and diseases across diverse farming systems. Crop protection products, particularly pesticides, directly enable \$31.6 billion or 73 percent of Australia's annual agricultural crop production. Similarly, veterinary medicines and animal health products are essential inputs that support Australia's \$38.6 billion livestock industry. Farmers rely on the APVMA and Australia's risk-based regulatory framework to determine which products they can use and how to use them safely. As such, Australian farmers have a significant interest in both understanding and engaging in the APVMA's processes and decisions.

The NFF importantly acknowledges the APVMA's work to date in pursuit of a more accessible, proactive, and inclusive stakeholder engagement strategy. We recognise and share the widespread view that there is room to improve the APVMA's stakeholder engagement methodology, as appropriately summarised in the consultation paper, namely: "...many stakeholders found APVMA's engagement approach to be at times inconsistent, fragmented, uncoordinated, and one-way in its communication."

There is a clear need for the APVMA to refresh its approach to stakeholder engagement to aid transparency and stakeholder understanding and confidence. The NFF is a stringent supporter of the role of the APVMA as Australia's world-leading, independent, science-based regulator of agvet chemicals. Given Australian farmers' reliance on access to safe, effective, and innovative technologies including agvet chemicals and veterinary medicines, the APVMA must ensure



genuine engagement with industry and users. To that extent, the NFF supports the renewal of the APVMA's stakeholder engagement model.

### ***Advisory Group***

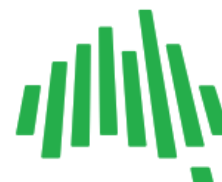
As a current member of the APVMA Consultative Forum, the NFF would welcome the opportunity to continue to provide input into the APVMA's strategic direction, work plan, and major issues related to agvet chemicals through the proposed APVMA Advisory Group. As established above, the NFF has a specific and well-established interest in the APVMA's statutory criteria pertaining to safety, efficacy, trade and labelling. The NFF also recognises the interest of the public and community groups in the safe and sustainable use of agvet chemicals. However, NFF members remain concerned about the potential involvement of activist groups seeking to derail, rather than positively and collaboratively contribute to, discussions around the APVMA's functions and legislative responsibilities. We urge the APVMA to closely consider the potential for non-constructive activities within the proposed advisory group by activists who do not support the APVMA's objectives, or Australian agriculture's need for a regulatory system that provides timely access to safe, effective, and innovative technologies. To that end, the NFF supports eligibility criteria including that members must demonstrate expertise in agvet chemicals and must be able to provide strategic insights to the APVMA. Further, we support the APVMA's proposal to update the terms of reference of each stakeholder forum to include a requirement that members engage in a constructive and professional manner, with a mechanism for dismissal of a member if they fail to do so. The NFF views this as a means of ameliorating potential disruption and ensuring the stakeholder engagement groups function effectively.

Further, given the broad scope of the Advisory Group, the APVMA should consider enabling the group to be informed by subject-matter experts and organisations and establish working groups when appropriate. For example, the Advisory Group may find it beneficial to establish a working group with external appointments to inform their understanding and drive strategic discussion on emerging technologies, safety aspects, or labelling reforms.

The NFF proposes transparent reporting of Advisory Group meeting outcomes to ensure all APVMA stakeholders have a shared understanding of the strategic direction of the APVMA.

### ***Engagement with agvet chemical users***

Several NFF member organisations currently sit on the APVMA's Agvet Users Forum. The NFF is supportive of the APVMA's sensible proposal to separate a component of the AgVet Users Forum remit into two working groups for ag chemical registrants and vet chemical registrants. The NFF supports the value in establishing working groups to focus on procedural aspects of the APVMA's



activities including application processes. However, the NFF holds serious concerns that the proposed model fails to provide a clear pathway for agvet chemical users to engage with the APVMA. While the NFF understands that agricultural commodity groups that engage with the APVMA's registration activities (e.g. organisations which hold permits) can participate in the Registrants' Working Groups, this is unlikely to capture all organisations that currently participate in the AgVet Users Forum. Agricultural commodity organisations require an avenue to understand the APVMA's processes, application of statutory criteria, and strategic direction. This interaction is essential for industry organisations to support end users to understand and engage with the regulatory system.

The NFF welcomes the opportunity to further discuss with the APVMA an appropriate forum through which agvet chemical users can access this information.

### ***APVMA engagement on items of significant public interest***

Ensuring public trust in the use of agvet chemicals and veterinary medicines in Australia is crucial; it requires effective communication and engagement with both industry and the broader community. While the NFF supports the proposed changes to the APVMA's engagement model, this must be just one part of a systemic overhaul to the APVMA's communication efforts.

The NFF believes that both the Australian Government and the APVMA can and should play a more proactive role to improve public awareness of the regulator's role, processes and decisions. Proactive communication efforts and the promotion of information based on science and evidence could importantly inform public discussion on agvet chemicals and veterinary medicines.

As one example, the NFF sees an urgent need to improve communication regarding chemical reviews. The public consultation associated with ongoing reviews of paraquat and diquat exposed weaknesses with the status quo approach to chemical review communication. Agvet chemical users would have benefited significantly from a plain-English explanation of technical data in the proposed regulatory decisions and impacts on use patterns. NFF members also noted a dearth of clear communication around what information the APVMA can and cannot consider in its reviews, and how relevant data can be provided from end users. Effective and tailored communication with stakeholders would have significantly assisted meaningful engagement in the APVMA's public consultation process. Further, misinformation regarding the APVMA's proposed regulatory decision on paraquat placed considerable pressure on the reputation of Australia's agvet chemical regulatory system. The NFF welcomed the APVMA's public statement correcting false and misleading claims. The NFF understands that the APVMA is actively considering its communication and engagement process in regard to chemical reviews, and supports these efforts wholeheartedly. As a



starting point, the NFF would strongly support the APVMA to conduct timely chemical review briefings for end users and create appropriate communication materials to support stakeholders' engagement in the APVMA's chemical review process.

Yours sincerely,

**Charles Thomas**  
A/CEO




# **NSW Farmers submission to Renewing the APVMA's engagement model**

February 2025

**NSW Farmers  
Level 4, 154 Pacific Highway  
St Leonards NSW 2065**

T: (02) 9478 1000 | F: (02) 8282 4500

W: [www.nswfarmers.org.au](http://www.nswfarmers.org.au) | E: [emailus@nswfarmers.org.au](mailto:emailus@nswfarmers.org.au)

• @nswfarmers  nswfarmers

For further information about this submission, please contact:

Angus Webber

0408 068 134 | [webbera@nswfarmers.org.au](mailto:webbera@nswfarmers.org.au)

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## About NSW Farmers

NSW Farmers is Australia's largest state farming organisation, representing farmers on the issues that matter to them such as the environment, biosecurity, water, animal welfare, economics, trade, workforce, and rural affairs.

Agriculture is a vital sector, quite literally feeding the nation. Farming directly employs more than 75,000 people across New South Wales, and underpins rural and regional communities, producing more than \$24 billion in food and fibre and making a significant contribution to the state and national economy.

Our aim is to support stronger farming businesses and reach \$30 billion in output by 2030. We ensure genuine voices from the paddock identify issues and shape policies, with teams in regional NSW and Sydney. We provide specialist advice and offer partner benefits that deliver excellent value for members.

## Executive summary

NSW Farmers welcomes the opportunity to provide input on APVMA's consultation paper regarding the renewal of its engagement model. As the largest state farming organisation representing the diverse interests of farmers across New South Wales, we recognise the critical role APVMA plays in ensuring the safety, efficacy, and sustainability of agricultural and veterinary chemicals within Australia.

We acknowledge APVMA's efforts to improve transparency and stakeholder engagement. APVMA's role is pivotal in maintaining a regulatory framework that supports safe, effective, and innovative agricultural practices. Its science-based approach is fundamental in safeguarding public health, the environment, and role in registering plus re-registering chemistry that underpin the productivity of Australia's agricultural sector.

However, it became evident during the review of Paraquat and Diquat that structural changes within APVMA are necessary to enhance transparency and ensure that the agricultural sector is best equipped to collaborate effectively with the Authority. This review highlighted gaps in stakeholder communication, data interpretation, and the timeliness of regulatory decisions.

To achieve the most effective scientific outcomes, it is crucial to strengthen the engagement model to foster a more collaborative environment between APVMA and agricultural stakeholders especially state farming associations. This includes clear pathways for input, timely dissemination of critical information, and structured opportunities for industry feedback, ensuring that regulatory decisions are informed by robust, locally relevant scientific data and industry expertise.

## NSW Farmers Recommendations

NSW Farmers seeks that the APVMA:

1. Provides extended notice periods for chemicals under review to allow Research and Development Corporations (RDCs) and stakeholders to address evidence gaps to assist preparation of submissions.



2. In collaboration with the federal Department of Agriculture, Fisheries and Forestry, establishes consultative committees with agriculture representative bodies to strengthen stakeholder engagement and guide regulatory outcomes through regular meetings.
3. Is equipped to adapt to advancements in agricultural technologies, enabling timely decision outcomes after consideration of industry advice and science to support decision making.
4. Makes decisions informed by data sourced from or relevant to Australian conditions and where this information does not exist, that in collaboration with the Australian Government, work with Research and Development Companies to provide data from Australian settings.
5. Extend the current implementation timeline by one month to allow for thorough consideration of stakeholder feedback and meaningful consultation on the proposed engagement model.

## **Recommendation 1: Extended Notice Periods for Chemicals Under Review**

APVMA's consultation paper does not address the critical issue of providing extended notice periods for chemicals under review which is vital to increasing engagement. The absence of clear guidelines around notice periods limits the ability of stakeholders to contribute comprehensive scientific evidence and informed perspectives to inform APVMA's decisions.

Previous reviews including Paraquat/Diquat highlighted how short timeframes for stakeholder responses restricted the collection of robust scientific data, peer reviews, and comprehensive risk assessments. This limited Research and Development Corporations (RDCs), industry bodies, and agricultural stakeholders from presenting complete and evidence-based submissions.

Adequate notice periods are essential to ensure regulatory decisions are informed by the best available science. It would provide time to identify evidence gaps, conduct relevant research, and validate findings specific to Australian agricultural conditions. Without this decisions risk being made on incomplete data, undermining scientific integrity and industry confidence.

While it is understood that APVMA must act swiftly when new information directly impacts human health, for routine chemical reviews, setting clear minimum consultation timeframes is critical. The length of notice should reflect the complexity of the review, potential impacts of proposed changes,

and the time needed to generate meaningful data. APVMA Advisory Group, can play a vital role in helping APVMA create realistic timelines, balancing scientific review requirements with the need to protect public health and environmental outcomes.

**Recommendation:** That the APVMA provide sufficient timeframes for responses to products under review to facilitate the provision of scientific evidence to inform decisions of the Regulator.

## **APVMA Engagement on Public Interest Matters**

Public trust in agricultural and veterinary chemical regulation relies on effective communication. The APVMA should adopt a proactive approach to improve public awareness of its role and decisions. Clear and accessible communication during chemical reviews is essential. The Paraquat and Diquat reviews highlighted the need for better engagement with stakeholders, including plain-language summaries of technical data and clear explanations of proposed regulatory decisions.

Miscommunication during the Paraquat review affected public perception of the regulatory process. Providing timely briefings, creating user-friendly materials, and addressing misinformation proactively are critical steps to maintaining public confidence in Australia's agricultural and veterinary chemical regulatory system.

**Recommendation:** That the APVMA:

- Improve stakeholder engagement and supporting processes to inform decisions of the Regulator.
- That any information provided to stakeholders be in plain-English to support clear understanding of proposed regulatory decisions and other matters pertaining to consultations by the APVMA.

## **Recommendation 2: Establishment of Consultative Committees**

NSW Farmers welcomes APVMA's proposal to expand on the current structure to establish more formal consultative committees, recognising their potential to strengthen stakeholder engagement and enhance the regulatory framework. The consultative committees proposed in the APVMA's engagement model include the National Registration Scheme (NRS) Advisory Group, the APVMA

Advisory Group, the Agricultural Chemical Registrants Working Group, the Veterinary Chemical Registrants Working Group, and the APVMA Registrants Information Updates forum.

These committees provide an opportunity to create a more structured and transparent engagement model that in theory should create meaningful collaboration between APVMA and key stakeholders. Strong representation from state farming organisations is critical to ensure that decisions reflect the diverse agricultural practices across Australia.

However, there are concerns about the potential involvement of groups whose objectives do not align with APVMA's regulatory functions. It is essential that committee members demonstrate relevant expertise in agvet chemicals and are committed to constructive, evidence-based engagement. There should be mechanisms in place to address non-constructive participation, including clear terms of reference and protocols for managing disruptive behaviours that could derail productive discussions.

## **APVMA Advisory Group**

APVMA Advisory Group is positioned to provide strategic advice on legislative responsibilities, including registration, monitoring, chemical reviews, compliance and enforcement. NSW Farmers emphasises the importance of including state farming organisations like ours whose members are the largest users of agvet chemicals, given our ability to provide grassroots, region-specific insights and practical feedback from on-the-ground agricultural operations. Our inclusion will ensure that APVMA's decisions are informed by diverse agricultural conditions and real-world experiences. NSW Farmers does note that National Farmers Federation (NFF) currently has a position on APVMA Consultative Forum. However, as outlined it is important that there is direct input from users of agricultural and veterinary chemicals in key engagements.

## **Agricultural and Veterinary Chemical Registrants Working Groups**

Agricultural Chemical Registrants Working Group and the Veterinary Chemical Registrants Working Group will focus on operational matters related to chemical registration processes. These working groups should incorporate industry organisations representing agricultural and veterinary chemical registrants to ensure that operational concerns are effectively addressed.

While these groups provide valuable platforms for registrants, there remains a gap in engagement opportunities for agricultural and veterinary chemical users who are not registrants. A dedicated mechanism for these stakeholders is essential to ensure their voices are heard, particularly in relation to practical application and safety considerations. The absence of such pathways risks disconnecting key agricultural voices from critical regulatory discussions.

Membership criteria should ensure participants possess relevant expertise in agvet chemicals and can contribute constructively to strategic discussions which should include state farming organisations. Clear terms of reference, coupled with mechanisms to address non-constructive participation, will help maintain the group's focus and effectiveness.

### **Enhancing Inter-Committee Connections**

A critical element for the success of these committees is the establishment of strong interconnections between them. Effective cross-committee communication will ensure cohesive decision-making and prevent siloed discussions. This can be achieved through regular updates, shared meeting outcomes and coordinated sessions addressing overlapping issues. Appointing liaison members or staff from APVMA to maintain continuous communication across committees will support consistent policy development and implementation.

NSW Farmers supports APVMA's initiative to improve transparency and stakeholder participation through these consultative committees on the condition that state farming organisations are included in Agricultural and Veterinary Chemical Registrants Working Groups.

## **Recommendation 3: Adapting to Advancements in Agricultural Technologies**

The pace of technological change in agriculture is accelerating, with innovations such as drone technology, precision application tools and autonomous delivery systems are integral to modern farming operations. To remain effective and support Australian farmers, APVMA must be equipped to respond swiftly to these advancements, ensuring that regulatory frameworks do not become barriers to the adoption of beneficial technologies for application of chemicals.

Delays in recognising and approving new technologies can hinder sustainability and competitiveness in the agricultural sector. This can limit opportunities for improved resource efficiency, reduced environmental impact and enhanced economic outcomes for farmers.

APVMA's new advisory committees offer a mechanism to support this adaptability. By incorporating industry expertise, these committees can provide timely feedback on emerging technologies, including the practical application, safety, and efficacy of tools such as drones and novel application systems. Their insights can help APVMA streamline approval pathways for new technologies while maintaining rigorous scientific standards.

Collaborating with advisory committees will enable APVMA to maintain regulatory agility, support evidence-based decision-making, and ensure Australian agriculture remains at the forefront of innovation.

## **Recommendation 4: Data-Driven Decision Making Relevant to Australian Conditions**

For regulatory decisions to be effective and relevant, they must be grounded in data reflective of Australia's unique agricultural environments. APVMA should prioritise the use of Australian-sourced data to ensure decisions are tailored to local conditions, practices, and environmental factors. Where such data is unavailable, collaboration with Research and Development Corporations (RDCs) becomes critical.

RDCs play a vital role in generating and managing agricultural research data. Their inclusion in APVMA advisory committees, would strengthen the connection between regulatory processes and the latest industry research. This collaboration will ensure that data gaps are identified early, and research priorities are aligned with regulatory needs.

Engaging RDCs within advisory structures will help APVMA make more informed decisions, reduce reliance on international data that may not reflect Australian conditions, and support the development of science-based, locally relevant regulations.

## Recommendation 5: Improving APVMA's Governance

Strong governance is essential to the success of APVMA's engagement model. NSW Farmers believes there must be adequate representation of farmers in both the Advisory Group and the working groups to ensure decisions reflect the practical realities of agricultural operations. Representation should be based on specific production sectors to account for the diverse ways chemicals are used across commodities.

The proposed four-year membership cycle raises concerns about the adaptability of advisory groups to respond to emerging issues and innovations in agriculture. NSW Farmers recommends mechanisms for periodic reviews within the term, allowing for continuous alignment with industry developments. Additionally, clear criteria should be established to replace members who are no longer active, fail to meet participation expectations, or do not effectively represent their sectors.

We also seek an extension of the current implementation timeline by one month. This additional time will allow for further consultation to ensure that governance structures are reflective of the requirements of the agriculture industry. It is concerning that this approach appears to be largely predetermined with the finalisation of the engagement model scheduled for the 24th of February, just two weeks after feedback on this consultation closes on the 7th of February. This short window raises concerns about how thoroughly stakeholder feedback would be considered. Consultation requires the stakeholder to be brought on the journey and have meaningful input. An extension will provide an opportunity for more comprehensive engagement and ensure the model is developed by the users of these chemicals, the farmers.

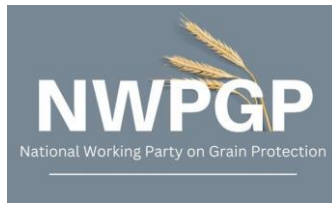
**Recommendation:** That APVMA extend the current implementation timeline by one month to allow for thorough consideration of stakeholder feedback and meaningful consultation on the proposed engagement model.

## Conclusion

NSW Farmers strongly supports APVMA's efforts to enhance its engagement model, recognising the importance of timely, transparent, and science-based regulatory decisions for the agricultural sector. Extended notice periods, strengthened consultative committees, adaptability to new agricultural technologies, and reliance on Australian-specific data are critical elements to achieving robust regulatory outcomes.



Working with key stakeholders, including state farming organisations and Research and Development Corporations, will ensure decisions are informed by real-world agricultural practices and the latest scientific research. By fostering transparent communication, proactive stakeholder engagement, and evidence-based decision-making, APVMA can continue to uphold its role as an effective, responsive regulator supporting the sustainability and productivity of Australian agriculture.



To:

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

Via email: [chemicalreview@apvma.gov.au](mailto:chemicalreview@apvma.gov.au)

Date: 16 December 2024

To whom it may concern

I write in response to a request for comments on the consultation paper “Renewing the APVMA’s engagement model”.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP).

1. The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia and the Chair is funded by Grains Australia.
- Has members across the entire grain supply chain.
- Hosts an annual conference providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwpgp>

2. Industry Comments

General Comments

As noted in the response to the “Draft Report of the Independent Review of the Agvet Chemicals Regulatory System”, following discussions and subsequent reports/findings released, we support an open and transparent communication process between the grain industry and APVMA. While the grain industry includes many of the users of agricultural chemicals, the impacts of use of those chemicals affect the marketing of the grain both within and outside Australia. Traders and marketers currently enjoy good market access, however, as noted previously in submissions, a greater awareness of the decisions of APVMA and its impacts on grain is needed.

The proposed APVMA Engagement Model will assist in that process and aid compliance of Australian grain with domestic and international regulations.



Specific comments on the consultation paper are outlined below, in no specific order of priority.

a) Stakeholders

On page 1 it states stakeholders of the APVMA include:

- Regulated entities
- Users/consumers/community
- Government

Those in the grain industry who trade grain domestically and for export are included in the middle category, being “users/consumers/community”. The consultation paper shows little regard for marketers/traders of grain (or other commodities). Going forward, we’d request APVMA specifically refer to and consider this sector when developing targeted consultation strategies as highlighted in the consultation paper. That is, different information is needed for the marketing sector than for chemical users, consumers of agricultural products and the general community.

b) Timeframes

On page 2 the timeframes outlined for deliverables is unclear. It is unclear if on 24 February 2025 applications for membership of the new committees opens, or those applications are now open. For example, on page 9 it states “The APVMA will seek expressions of interest for membership...” implying application for membership is not currently open, however the timelines appear short for this process to be completed from 24 February – 24 March 2025.

While the NWPGP does not propose to nominate for one of the committees (i.e., Advisory Group), others in the grain industry may. Your clarification on this matter would be appreciated.

c) Structure and Governance

The three levelled approach outlined on page 4 and in the remainder of the consultation paper of Strategic, Operational and Informational is appropriate provided:

- Suitable representation across industries can be obtained.
- Sub-groups are open to and formed via membership of stakeholders directly involved in the tasks, activities and issues to be specifically addressed. The scope of those sub-groups will be key to meeting objectives of the engagement strategy and the industry looks forward to further advice in that regard.

The APVMA Advisory Group is the group where, as previously mentioned, a representative of the grain market / trade should be considered. The outcomes of chemical use, being chemical residues on grain, are dealt with when trading grain domestically and for export. Residues are managed for compliance with commercial contractual requirements and for meeting relevant country regulations. That risk is specific to those grain products and markets and is effectively managed by the grain



industry as shown in residue data and through continued market access. The APVMA is encouraged to consider membership by a grain industry organisation whose members are directly involved in that risk management process.

The Registrants' Information Updates is seen as the opportunity for APVMA to more fully engage with all sectors. It is questioned how the APVMA will engage in this regard given it is focussed on "registrants", or whether other mechanisms currently used by the APVMA (e.g., website, consultations, Trade Advice Notices, gazettes etc) will continue. If the latter which we assume will continue, this consultation mechanism should be included in the Engagement strategy to ensure it is all-encompassing.

Should you have any questions on this submission please do not hesitate to contact me.

Regards

Gerard McMullen

Chair  
National Working Party on Grain Protection

[www.graintrade.org.au/nwpgp](http://www.graintrade.org.au/nwpgp)

*Produced through Grains Australia Limited funding of this activity*





February 5, 2025

**Renewing the APVMA's engagement model – Consultation paper December 2024**

The VMDA represents the largest group of manufactures of veterinary medicines and animal health products in Australia.

Our members produce a wide range of products and distribute these in Australia and various export markets.

We also represent distributors of products and providers of services such as regulatory consultants and testing laboratories.

We note that the relevant legislation (The Agvet Code) states, among other things:

(c) that the furthering of trade and commerce between Australia and places outside Australia, and the present and future economic viability and competitiveness of primary industry and of a domestic industry for manufacturing and formulating such products, are essential for the well-being of the economy and require a system for regulating such products that is cost effective, efficient, predictable, adaptive and responsive; and...

The VMDA welcomes the revision of the consultation mechanisms surrounding the Agvet Code and its administration by the APVMA.

We commend the proposals to expand and streamline the consultation process to include a wide range of interested parties.

Specifically, the VMDA proposes that:

The APVMA Advisory Group should be constituted as proposed, but with the added 'specific interest' of supporting and maintaining a viable Australian industry to supply the needs of animal welfare and trade.

Further, the VMDA proposes that membership of the APVMA Advisory Group should not preclude any representative organisation or its individual members also holding membership of the Vet Chemical Registrants Working Group. This group will it appears, be involved in more detailed and technical activities and as such, membership at both levels would benefit Australia's broader agvet chemical community, especially where the attending members can be tailored to the issues at hand.

We look forward to further opportunities for input to this process.

Jim Adams  
Executive Director  
VMDA