



## Case study – Adopting a risk-based approach to compliance

The APVMA applies a risk-based and proportionate approach to compliance and enforcement to protect the health and safety of people, animals and the environment, while supporting agricultural productivity and maintaining confidence in Australia’s agvet chemical regulatory system.

Consistent with its regulatory posture, the APVMA promotes voluntary compliance and education, balanced with decisive enforcement action where necessary. This approach recognises that the most effective regulatory outcomes are achieved by focusing resources on the highest-risk behaviours and activities, rather than applying uniform enforcement across all matters.

In 2024, the APVMA strengthened its compliance posture to prioritise data-driven and intelligence-led targeting of emerging and serious risks. Compliance responses are informed by:

- the seriousness of alleged or detected non-compliance
- the potential harm to human health, animals, agriculture or the environment
- impacts on Australia’s trade and market access
- the compliance history and behaviour of regulated entities

This approach supports consistent and predictable regulatory decision-making, while ensuring that regulatory effort is directed to matters that pose the greatest risk to the Australian community.

Rather than relying solely on reactive enforcement, the APVMA increasingly uses intelligence sharing and market monitoring to identify and address non-compliance early. This enables the removal of unsafe or unlawful products from the market before harm occurs, reducing regulatory burden while strengthening system integrity.

Compliance data over the past three years demonstrates the effectiveness of this proportionate approach. While enforcement activity has increased overall, there has also been a deliberate shift toward education and early intervention. In the second half of the 2024–25 financial year, more than 70 per cent of investigations focused on medium- and high-risk matters—reversing a previous pattern where approximately 70 per cent of investigations were directed at low-risk issues.

### Collaborating to achieve better regulatory outcomes

Consistent with its commitment to clear, transparent engagement and collaboration, the APVMA works closely with industry and other stakeholders to disrupt non-compliant supply chains. A media release issued on 10 February 2025 reported the removal of 532 unregistered agvet chemical products from online marketplaces between July and December 2024.

Building on this work, the APVMA partnered with Syngenta Australia’s Corporate Security Group to share intelligence on counterfeit and unregistered products. This collaboration enabled the

identification and removal of additional unlawful products from online marketplaces without the need for resource-intensive investigations.

As a result, a total of 1,277 unregistered products were removed from online marketplaces in 2024–25, compared with 246 in the previous financial year. This intelligence-led approach delivered timely, proportionate regulatory outcomes, prevented hundreds of potential investigations, and ensured that regulatory resources were directed to the areas of greatest risk.

By applying risk-based regulation, acting proportionately, and collaborating effectively with stakeholders, the APVMA continues to strengthen compliance with the Agvet Code. This case study demonstrates how the APVMA’s regulatory posture supports firm and fair enforcement, protects public and environmental safety, and reinforces trust in Australia’s agvet chemical regulatory system.