



7 February 2025

Engagement and Communications
Australian Pesticides and Veterinary Medicines Authority

Via e-mail: 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

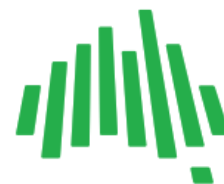
As a current member of the APVMA Consultative Forum, the NFF would welcome the opportunity to continue to provide input into the APVMA's strategic direction, work plan, and major issues related to agvet chemicals through the proposed APVMA Advisory Group. As established above, the NFF has a specific 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.

The NFF thanks the APVMA for the opportunity to make a submission on Renewing the APVMA's engagement model. The policy contact for this matter is Mr Zac Rayson, Senior Policy Officer (Rural Affairs), via e-mail: zrayson@nff.org.au.

Yours sincerely,

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