

29 April 2025

Director, Strategy and Governance  
Australian Pesticides and Veterinary Medicines Authority  
GPO BOX 574  
Canberra ACT 2601 Australia

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

**Re: APVMA draft Strategic Plan 2025–30**

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 the *APVMA draft Strategic Plan 2025–30*.

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 to producing food and fibre in Australia. Timely access to safe and effective AgVet chemicals is critical to Australian agriculture's productivity, sustainability, competitiveness, and supports food and fibre security.

The NFF is a stringent supporter of the role of the APVMA as Australia's robust, independent, and science- and risk-based chemical regulator, and supports the delivery of a Strategic Plan that enables the APVMA to fully meet its obligations and the needs of the Australian agricultural community.

Please find attached our comments regarding the APVMA's draft Strategic Plan 2025–30. We also refer the APVMA to consider the submissions of CropLife and Animal Medicines Australia.

The NFF supports all four pillars as proposed in the Draft Strategic Plan and supports many of the proposed measures in principle. We recognise the reforms underway within the APVMA to better meet the needs of Australia, including the agricultural industry.

The policy contact for this matter is Mr Zac Rayson, Senior Policy Officer (Rural Affairs), via e-mail: [zrayson@nff.org.au](mailto:zrayson@nff.org.au).

Yours sincerely,

TROY WILLIAMS  
**Chief Executive Officer**

## APVMA's draft Strategic Plan 2025-30

### Our Purpose

*"The APVMA regulates agricultural and veterinary chemicals to protect the health and safety of people, animals and the environment, and to support Australia's primary industries, biosecurity and international trade."*

The NFF supports in principle the draft purpose above. However, we believe that the phrasing does not fully reflect the *Agricultural and Veterinary Chemicals Code Act 1994* (AgVet Code) and therefore the statutory purposes of the APVMA in implementing this regulatory framework. Section 1A of the Code states that:

(a) the furthering of trade and commerce between Australia and places outside Australia; and

(b) the present and future economic viability and competitiveness of primary industry which relies on access to chemical products and their constituents; and

(c) a domestic industry for manufacturing and formulating chemical products and their constituents;

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."

The NFF urges the APVMA to consider how best to recognise, in its purpose, the necessity of access to AgVet chemicals, given Section 1A(b) notes that the agriculture industry "relies on" AgVet chemicals and that access to such products "are essential for the well-being of the economy".

### Our Vision

*"To be a global leader in agricultural and veterinary chemicals regulation for the benefit of Australia."*

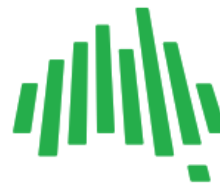
The NFF supports the draft vision as stated.

## Strategic Objectives

### Being a trusted, transparent and fair regulator.

The NFF supports this focus.

**Measure 1:** *"The proportion of stakeholders surveyed who agree that the APVMA has been a trusted, transparent and fair regulator over the past 12 months."*



The NFF urges the APVMA to carefully consider the validity of using a broad survey to accurately represent the performance of the APVMA as it is subjective and capable of being manipulated by vested interests.

The agriculture industry comprises a large cohort of end users of AgVet chemicals. While maintaining the trust of the Australian public and other stakeholders regarding the regulation and use of AgVet chemicals is crucial for the APVMA and for agriculture itself, the APVMA must also strive to maintain high-level confidence and trust of the agriculture industry as critical end users of AgVet chemicals.

As such, while the NFF supports Measure 1, we urge the APVMA to consider and individually report on the proportion of different stakeholder groups, particularly agricultural end users, “who agree that the APVMA has been a trusted, transparent and fair regulator over the past 12 months.”

The APVMA must maintain the trust of all stakeholders across the supply chain as well as the broader Australian public. Stakeholder surveys must be appropriately designed to deliver both representative and informative results.

**Measure 2:** *“The proportion of all applications finalised within legislative timeframes.”*

The NFF strongly supports this measure as fundamental to assessing the APVMA’s performance.

Compliance with legislative timeframes is, and must be, a core objective of the APVMA. However, the APVMA’s assessment process at present is marred by significant delays and unpredictability. A lack of predictability disincentivises registrants from bringing innovative products to Australia. Should this scenario continue, it could threaten “the present and future economic viability and competitiveness of primary industry” as per section 1A(b) of the AgVet Code.

The APVMA’s proposed reduction of targeted adherence to legislated timeframes from 100 per cent to 90 per cent across technical and non-technical assessments does not deliver on the purpose of the AgVet Code, that is to deliver “a system for regulating chemical products and their constituents that is cost effective, efficient, predictable, adaptive and responsive.”

The NFF strongly urges the APVMA to reinstate the target of 100 per cent of assessments completed in legislated timeframes. The APVMA cannot, as per the draft vision outlined above, be “a global leader in agricultural and veterinary chemicals regulation” unless it targets meeting its legislated timeframes.

We note that other relevant regulators, including the Office of the Gene Technology Regulator (OGTR) and Food Standards Australia and New Zealand (FSANZ) target and consistently achieve 100 per cent on-time assessment performance.

The NFF supports placing Measure 2, amended to include a 100 per cent on-time assessment metric, as the primary indicator of the APVMA’s performance. This

would encourage the APVMA to expedite efficiency improvements to deliver improved regulatory performance and to provide clear explanations if targets are not met. Further, it would create an imperative to deliver on-time regulatory assessment in a manner that does not detract from the APVMA's other regulatory functions.

**Measure 3:** *“The number of Proposed Regulatory Decisions and Final Regulatory Decisions for chemical reconsiderations that are released within the reporting period.”*

The NFF does not support Measure 3 as proposed. APVMA Proposed and Final Regulatory Decisions for chemical reconsiderations must be science- and risk-based rather than beholden to artificial timelines – which could potentially give rise to the scenario where APVMA resources are redeployed from other areas, including registrations and minor use permit renewals, to complete chemical reviews and meet Measure 3 goals at the expense of other essential activities. It also risks Proposed Regulatory Decisions and Final Regulatory Decisions being rushed or failing to appropriately consider all relevant data.

The number of Decisions released within a reporting period is therefore not an appropriate metric of success, and the APVMA should instead consider the measure including the number of APVMA decisions which meet reasonable timeframes outlined by the APVMA.

**Measure 4:** *“The proportion of serious adverse experience reports received and assessed by the APVMA within 20 business days.”*

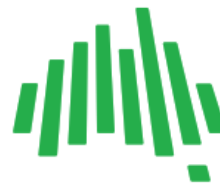
The NFF supports the APVMA measuring its performance relating to the Adverse Experience Reporting Program (AERP). However, the NFF believes a more holistic approach to measuring the success of adverse experience reporting should be adopted. The APVMA should consider not only the proportion of serious adverse experience reports assessed by the APVMA within 20 business days of being received, as currently proposed, but also the responses taken by the APVMA to such reports.

The NFF believes the APVMA should better promote the AERP, including for reports of poor efficacy of AgVet chemicals, and should better communicate the outcomes of adverse experience reports – including both responses to individual AgVet chemicals as well as systemic changes or improvements made in response to adverse experience reports.

### **Support a contemporary regulatory system**

The NFF supports the objectives of this pillar.

**Measure 5:** *“The number of compliance activities, recalls and/or other regulatory actions the APVMA undertakes, including those with State and Territory partners.”*



The NFF cautions against reliance on this metric. The number of compliance activities, recalls or other regulatory actions should only reflect the need for those activities. The number of activities does not measure the success, timeliness or effectiveness of those activities. A higher number of compliance activities does not equal a more responsive, contemporary system if those activities were not required or effective.

**Measure 6:** *“The number of submissions, proposals or other significant contributions the APVMA makes at domestic or international fora.”*

The NFF supports this measure.

**Measure 7:** *“The cumulative amount of time saved in application assessments by using international assessments.”*

The NFF strongly supports this measure and improving the APVMA’s utilisation of available, trusted international data.

### **Building foresight capacity**

The NFF supports this pillar.

**Measure 9:** *“The proportion of externally validated evaluations of the APVMA’s scientific capability that pass quality and performance criteria.”*

The NFF strongly supports this measure.

**Measure 10:** *“The number of guidance documents, discussion papers etc that the APVMA contributes to, writes or presents at domestic and international fora.”*

The NFF supports this measure.

**Measure 11:** *“The APVMA Regulatory Achievement score is at or above the target.”*

The NFF recognises the value of holistic or summary measures in assessing overall performance but believes Measure 11 should be carefully considered.

Effective performance across specific areas of the APVMA’s functions should not disproportionately mask underperformance in other areas in an aggregate score, or vice versa. Independent assessment and reporting of individual measures (including those proposed in this draft Strategic Plan, but also the three 24–25 measures) should be the primary model of performance reporting. Composite measures such as the Regulatory Achievement Score are useful but cannot replace detailed assessment and transparency on individual measures, given the risk of oversimplification.

**Measure 12:** *“Milestones outlined in the APVMA ICT investment plan are delivered on time and on budget.”*

The NFF supports this measure.

**Attracting, developing and retaining talented people**

**Measure 13:** *“Proportion of APVMA staff who report a high level of engagement with the APVMA.”*

The NFF supports this measure and ensuring the APVMA can attract, develop and retain a world-class workforce. However, while staff satisfaction is an important metric, we suggest other measures should also be considered to deliver a rounder picture of APVMA’s ability to attract, develop and retain talented people. This could include staff turnover rates, the number of unfulfilled positions, or the time taken to recruit positions. This could also consider whether the APVMA’s staffing level is sufficient to meet the APVMA’s obligations and legislative timeframes.

**Measure 14:** *“APVMA Expert Scientific Reviewer (ESR) Investment Score is at or above target.”*

The NFF supports the use of ESR to supplement the APVMA’s capacity, but does not have a position on the appropriateness of this measure in accurately assessing ESR investment.