

30 April 2025

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

Via email: engagement@apvma.gov.au

To the Director,

RE: Submission in response to APVMA Draft Strategic Plan 2025-30

The NFF Horticulture Council (the Council) on behalf of the wider national horticulture industry, would like to thank you for the opportunity to provide comment on the draft APVMA Strategic Plan 2025-30.

The Council is the recognised national peak body for forming policy and advocating on behalf of the Australian horticulture industry. The Council comprises 19 national commodity and state-based horticulture bodies, who together represent growers of all sizes and products including fruits, vegetables, nuts, ornamental plants and turf.

Horticulture is one of the most diverse sectors in agriculture with a wide range of crops and crop types grown to meet the needs of the Australian community. This diversity also means that the range of crop protection products utilised by the sector is significant and varies widely.

The Council is a strong supporter of a rigorous science based regulatory system for agricultural and veterinary chemicals. We recognise that the APVMA plays an important role in ensuring that chemicals sold and used in Australia are both safe and effective.

We fully support the comprehensive submission made by the National Farmers' Federation (NFF) and wish to emphasize the following key points from their submission:

1. Role and Strategic Objectives:

- We endorse the APVMA's role as a robust, independent, science- and risk-based regulator.
- We support the strategic objectives outlined in the draft plan, particularly the focus on being a trusted, transparent, and fair regulator.

2. Timely Access:

- We stress the importance of timely access to AgVet chemicals for the horticulture sector. Delays in the approval process can significantly impact our members' operations and the broader agricultural industry.
- We support the NFF's call for the APVMA to maintain a target of 100% compliance with legislative timeframes for application assessments and permit applications and renewals.

3. Stakeholder Engagement and Trust:

- We agree with the NFF's recommendation for the APVMA to individually report on the trust levels among different stakeholder groups, including agriculture end users and specifically minor use crops.
- Effective stakeholder engagement is crucial for maintaining confidence in the regulatory system.

4. Performance Measures:

- We support the NFF's suggestions for refining performance measures to ensure they accurately reflect the APVMA's effectiveness and efficiency.
- Specifically, we endorse the need for measures that focus on the quality and timeliness of regulatory decisions rather than the quantity.

5. Utilization of International Data:

- We strongly support the APVMA's efforts to utilize trusted international data to streamline the approval process and reduce assessment times.

We believe that the APVMA's strategic plan, with the suggested amendments, will better serve the needs of the horticulture sector and the broader agricultural community. We look forward to continued collaboration with the APVMA to ensure a regulatory framework that supports innovation, efficiency, and sustainability in Australian agriculture.

Thank you for considering our submission. To discuss further please be in contact with Richard Shannon, Executive Officer to the Council either by email at hortcouncil@nff.org.au or phone on 0448 860 630.

Yours sincerely,



JOLYON BURNETT
Chair
NFF Horticulture Council