



The Hon. Mr Tony Burke MP
Minister for Agriculture, Fisheries and Forestry
PO Box 6022
Parliament House
CANBERRA ACT 2600

8 September 2009

Dear Mr Burke,

Re: Review process for Australian Pesticides and Veterinary Medicines Authority

I write to alert you to flaws in the review process for the Australian Pesticide and Veterinary Medicines Authority (APVMA), and call on you as minister responsible to see that these are fixed promptly.

CHOICE is supportive of the APVMA review being conducted and we are involved in the stakeholder consultation process. CHOICE thinks that it is important that the Authority be thoroughly re-designed in order to become a strengthened independent statutory body, free from the influence of the chemicals industry, with a precautionary approach to chemicals regulation.

CHOICE has become concerned that the review process is flawed in the following ways:

1. The timeframe for the review is unsatisfactory.

The timing of the review, aimed at addressing the matter at the first COAG meeting in 2010, is too rushed. In particular, the discussion paper is due out very late in the year, with submissions to be made in January. This scheduling over the summer holiday period is inappropriate, as many organisations vacate over this period. This will result in less detailed responses that are submitted, and will prevent many stakeholder responses altogether, particularly from the not-for-profit community sector. A thorough and considered review is required over a longer timeframe. It would be sufficient to present the review findings at the second COAG meeting in 2010.

2. The communications processes are insufficient to ensure transparency and inclusiveness.

CHOICE is informed by the APVMA that there is no website or webpage for the review and no publicly available information about the review. Further, the consultants engaged to facilitate this process were also unable to report whether a call for submissions will be broadly advertised. As such, it is apparent that no communication strategy has been

57 Carrington Road Marrickville NSW 2204

Phone 02 9577 3333 Fax 02 9577 3377 Email ausconsumer@choice.com.au www.choice.com.au
The Australian Consumers' Association is a not-for-profit company limited by guarantee. ABN 72 000 281 925 ACN 000 281 925

developed for the consultation in this review. This is unacceptable and will not lead to thorough, inclusive, transparent or accountable process.

3. The stakeholder identification and engagement process is insufficient, particularly in the community sector.

The consultants concede they are relying on the Department of Agriculture Forestry and Fisheries to identify and invite stakeholders. They do not appear confident that the range of key stakeholders involved in the process is representative, particularly in the community sector. CHOICE was the only community sector stakeholder at the recent stakeholder meeting with the consultants in Sydney (31st August 2009).

This sub-optimal approach does little to ensure confidence in the review. If the government is serious about fixing the serious flaws with the regulation of chemicals in Australia, it is essential that the APVMA review's consultation process is conducted appropriately. As minister responsible, CHOICE asks you to see the above flaws with the consultation process are fixed promptly.

Should you wish to discuss any issues raised in this letter, please feel free to contact me on (02) 9577 3374 or knorris@choice.com.au.

Sincerely



Kate Norris
Senior Policy Officer