



**Senator  
Rachel Siewert**

Australian Greens Senator for Western Australia

Stephen Targett  
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Narrandera NSW 2700

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Dear Stephen

Thank you for your correspondence highlighting chemical labelling concerns within the agricultural industry. Senator Milne has passed on your concerns to me, as I am the Australian Greens Spokesperson on Agriculture.

I share your concerns that an ad-hoc approach to applying dangerous chemicals in Agriculture can have detrimental effects to the environment and our health. We must exercise caution with potentially dangerous products that have not undergone long term testing for impacts.

In 2014 the Australian Greens tabled a dissenting report on the Agricultural and Veterinary Chemicals Legislation Amendment (Removing Re-approval and Re-registration) Bill 2014. This Bill essentially wound back a move to re-approve and re-register potentially dangerous pesticides by the Australian Pesticides and Veterinary Medicines Authority. The Australian Greens expressed concern about this wind back. I have attached the dissenting report for your information.

Yours sincerely

Senator Rachel Siewert  
Australian Greens Spokesperson on Agriculture



## **Dissenting report – Australian Greens**

1.1 The Australian Pesticides and Veterinary Medicines Authority (APVMA) has only just gained the legislative triggers it needs to systematically review and quickly remove highly hazardous and unmanageable pesticides from the market if they fail to meet today's scientific and regulatory standards, making way for safer, greener pesticides.

1.2 It is extremely disappointing that these important and long overdue amendments due to come into effect in July are being unwound. The re-approval and re-registration scheme would ensure Australia finally undertook a systematic review of its ag-vet chemical inventory, many of which have never been subject to contemporary risk assessment and are not considered safe by any modern measure, yet persist in our community.

1.3 Legislated risk-based re-registration schemes operate in the USA, Canada and the European Union. The key focus of re-registration in these jurisdictions is to ensure older pesticides on the market are subjected to the same standards applied to pesticides registered today.

1.4 Australia has a problem and the re-registration scheme is designed to fix it. Australia has hundreds of pesticides that were 'grandfathered' into the National Registration Scheme that have never been risk assessed. These products are sold and used today and the risks they pose to the community, the environment and trade have never been quantified and the risk management strategies needed to control their negative impacts have not been specified.

1.5 Without re-registration, the APVMA will continue to operate in much the same way it always has with respect to chemical reviews and the fundamental problem of inadequately assessed pesticides remaining on the market will not be systematically addressed.

1.6 The APVMA has a poor track record with its chemical review program with many high risk pesticides under review for 10-15 years without adequate action being taken to mitigate risks, or indeed remove pesticides from use that are clearly just too dangerous.

1.7 Without a re-registration scheme, the APVMA has only an ad hoc approach to chemical review. There is no rationale in what ends up on the chemical review list and no guarantee that regulatory effort will be focused in on the pesticides of greatest risk.

1.8 According to the submission to the Senate Rural and Regional Affairs and Transport Legislation Committee Inquiry by the Queensland Government (the control of use regulator):

The general concept of re-registration and re-approval has merit and is utilised by many overseas regulators as a way of ensuring that agvet chemicals have been approved by modern risk assessment principles. In Australia, there are a large number of uses of agvet chemical products that were approved by the registration system of the States and Territories, prior to the formation of the APVMA that have not been reassessed by modern risk assessment principles.

One of the great promises of national registration was that the 'grandfathered' products would be re-assessed. There has been limited progress in re-assessing the uses of these products under the APVMA Chemical Review program."