



**Australian Government**

**Department of Agriculture, Fisheries and Forestry**

Mr Mike Adams  
eythorne@microtech.com.au

Dear Mr Adams

Thank you for your correspondence of 9 May 2009 to the Hon. Tony Burke MP, Minister for Agriculture, Fisheries and Forestry, regarding the effectiveness of Australia's agricultural and veterinary chemical regulation system in protecting public health. Minister Burke has asked me to reply on his behalf.

The Government shares your concern that public health and the environment are properly protected from any adverse consequences of pesticide use. It is for this reason that the sale and use of agricultural and veterinary (agvet) chemicals is regulated in Australia. The Commonwealth, state and territory governments have responsibility for different aspects of this regulation. The Australian Government is responsible for registration of agvet chemicals before sale, a function which is carried out by the Australian Pesticides and Veterinary Medicines Authority (APVMA). Responsibility for regulations controlling the use of agvet chemicals once they are sold rests with state and territory governments.

Before registering agricultural and veterinary (agvet) chemical products for sale in Australia, the APVMA undertakes a rigorous assessment of the health and environmental risks. This assessment is based on scientific advice received from the Office of Chemical Safety in the Department of Health and Ageing and the Department of the Environment, Water, Heritage and the Arts. In addition to assessing and registering agvet chemicals, the APVMA regularly reviews existing registered chemicals, including assessing any new evidence that becomes available, under its Chemical Review Program.

In undertaking chemical reviews, the APVMA considers decisions made by overseas regulatory authorities such as the European Commission. However, because Australian climatic conditions and farming practices may differ from those of other countries, regulatory decisions made by other countries may not be necessarily applicable to Australia. Further, with respect to differences between European and Australian regulatory decisions, in Europe, products may no longer be available for commercial, rather than safety, reasons. This is because product manufacturers choose not to provide the necessary data to support the continuing registration of some chemical products. On the other hand, the European Union permits the use of some chemicals that are not available in Australia.

The APVMA hazard characterisation and risk assessment process is very thorough in its evaluation of each individual pesticide. Australia uses best international practices and relies on the best available scientific information in reaching its regulatory decisions. The many scientific studies

carried out for each chemical address a vast range of concerns, and only after all concerns are resolved can the chemical be registered for specific controlled uses.

No country repeats this huge range of studies for each of the many different possible mixtures of pesticides that might be encountered when assessing chemicals for registration because the number of different possible mixtures would be overwhelming. Instead, the concern that some possible mixtures might lead to higher than expected levels of toxicity than anticipated from the individual components alone has been addressed in a different way. Studies have been done on selected mixtures that might be more commonly found. The results of such studies show that it is rare to find unusual interactions leading to enhanced toxicity for mixed components. With those few instances where some interaction has been detected, the risks from the mixture at levels of exposure that would be encountered by people are not significant.

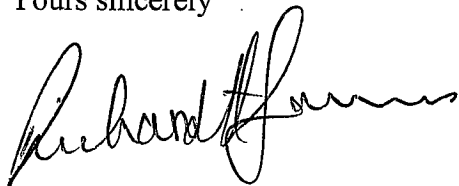
Australian health officials and their counterparts around the world continue to look for ways to test different mixtures more efficiently. In the meantime, the large safety margin built into health standards of exposure for each individual chemical, combined with the evidence from studies of mixtures so far, means that the public can be reassured. The APVMA has recently dealt with this subject at its national Science Fellows Symposium and will soon publish an article on its website ([www.apvma.gov.au](http://www.apvma.gov.au)) about research into this area.

The Primary Industries Ministerial Council (PIMC), which is responsible for national agvet chemicals policy, is conducting a review of Australia's National Registration Scheme for agvet chemicals in response to a directive by the Council of Australian Governments (COAG). PIMC has been asked to bring forward for COAG consideration a proposal for a new, single, national framework to improve the efficiency and effectiveness of the regulation of agvet chemicals in the first half of 2010.

The review provide the opportunity to address both the registration of agvet chemicals by the APVMA and regulation of the use of agvet chemicals once they are sold, including compliance and enforcement arrangements. This work is being undertaken by the Product Safety and Integrity Committee (PSIC) which includes representatives of the Environment Protection and Heritage Council, the Australian Health Ministers' Advisory Council and the Workplace Relations Ministers' Council. PSIC will be seeking the views of its stakeholder reference group as part of the process of developing a discussion paper which will form the basis for broader stakeholder consultation later this year. National community interest groups, including the National Toxics Network and Choice, are represented on the PSIC stakeholder reference group.

Thank you for bringing your concerns to the Government's attention.

Yours sincerely



Richard Souness  
General Manager  
Food and Product Safety and Integrity Branch  
Product Integrity, Animal and Plant Health Division

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