



AgVet Chemicals

Agreed to by the VFF Policy Council

Meeting 185

22 November 2024

Policy Statements

General Principles

1. The VFF recognises the critical role of AgVet chemicals in ensuring a fibre and food-secure future for Victoria. These chemicals are essential for effective pest and disease management in both agricultural and residential settings, thereby enhancing Victoria's social and economic wellbeing.
2. The VFF supports maintaining a stable regulatory environment for AgVet chemicals to prevent disruptions to agricultural production. AgVet chemicals are vital for supporting both the domestic market and maintaining the international competitiveness of Victorian agriculture.
3. The VFF advocates for robust, science-based and responsive regulatory framework that prioritises the availability of AgVet chemicals.
4. The VFF strongly supports a regulatory framework where fundamental consideration is given to the health and safety of farmers, and workers when assessing the registration and use of AgVet chemicals. The risks associated with the handling of chemicals should be effectively communicated, and clearly labelled. Farmers are responsible for ensuring, appropriate measures are implemented to ensure the safe use and handling of these products.
5. The VFF opposes any regulatory reform that does not align with contemporary scientific knowledge about plant and animal science. Reforms must benefit the entire industry and avoid adding unnecessary burdens, ensuring that regulations remain effective and relevant.
6. The APVMA's review process of chemicals should be conducted in the most timely and efficient manner whilst maintaining the integrity of the process through evidence-based analysis. The APVMA should be adequately funded to be able to undertake this task.
7. The VFF believes in a regulatory system that is responsive and applies to the context of farming in Australia. Australia's primary production and agricultural practices are distinct and should be regulated based on local conditions, ensuring competitive and sustainable farming.

Pressure to align with international farming and regulatory practices should not undermine our ability to regulate chemicals in a way that suits Australian conditions.

8. The VFF opposes overseas regulatory regimes that are incompatible with the needs of Australian production systems and impose trade restrictions on our products. International regulatory and market led quality assurance should not unfairly and baselessly disadvantage Australian producers who are responsibly using chemicals in line with Australian regulations and accepted practices. International regimes should be inclusive in order to allow Australian farmers to participate fairly, specifically since Australia has already implemented strict and robust regulatory systems and is a leader in the implementation of sustainable agricultural practices.
9. The VFF advocates for chemical companies and the APVMA to maintain an open and honest culture regarding the impacts of chemicals on human health, animal health and welfare, and the environment. The VFF believes that chemical companies and the APVMA have a duty to continuously improve communication concerning the application, use, and labelling of AgVet chemicals, particularly in cases of product recall.
10. The VFF believes the APVMA should ensure appropriate transition plans are in place when changing or updating the status of any chemicals. Appropriate transition periods should be in place to facilitate approvals for new chemistry or use practices before changes take effect.
11. The VFF acknowledges the importance of Victorian farmers adopting best practices in the use of AgVet chemicals to minimise the risk of chemical target sites and antimicrobial resistance in their production systems. This approach is crucial for ensuring the long-term efficacy of these chemicals, protecting the viability of agricultural production systems, and maintaining the effectiveness of pest and disease management strategies.

AgVet Chemical Permits

12. The VFF supports implementation of Minor Use Permits (MUPs). MUPs ensure Australian farmers have access to safe and effective AgVet chemicals where full product registration is not economically viable.
13. MUP regulation should be clear and transparent about factors and/or assumptions affecting minor/major crop categorisation. The APVMA must clarify what information will be required for both MUP applications and renewals and full product registrations.
14. The APVMA must have clear, detailed and timely transition plan in place for transitioning from MUP to full permit.
15. VFF acknowledges the importance and supports agricultural chemical user permit (ACUP) system. Any changes or updates to chemicals use legislation, or training requirements must be discussed with the affected industry bodies to understand the practical impact of the proposed changes.

16. VFF does not support changes of existing training requirements without the acknowledgement and recognition of prior training experience for the use of agricultural chemical use permits (ACUP).
17. VFF supports changes to ACUP permits if they have positive impact on farm safety.

Off-label Use

18. The VFF supports appropriate restrictions and controls on off-label use, guided by thorough risk assessments to ensure safe and effective application. Regulations and guidance on off-label use should be developed to maximise farmers' ability to use professional judgement while maintaining appropriate safety procedures. This includes adhering to recommended concentrations and frequency of application where applicable.
19. The VFF supports the ability of agricultural professionals to recommend and prescribe off-label AgVet chemicals when necessary, recognising that current products may not be licensed for all species or situations in agricultural production.

Recycling and disposing of chemicals

20. The VFF believes that stewardship programs for AgVet chemicals are a shared responsibility among industry stakeholders, government, and the farming community. These programs must be adequately resourced to promote widespread adoption and effective management of AgVet chemical products and their containers.
21. The VFF insists that government policies should focus on proactive measures for the safe destruction and recycling of AgVet chemical containers and waste. Government agencies must support the farming community in managing AgVet chemical waste, ensuring environmental protection and promoting sustainable farming practices.

Safety programs and training

22. The VFF supports government and industry-led programs and initiatives that promote a safety culture focused on continuous improvements and training around the effective use of AgVet chemicals.

Harmonisation and standardisation reform

23. The VFF endorses the harmonisation of maximum residue limits with other Australian jurisdictions, ensuring consistency and facilitating compliance for Victorian farmers.

24. The VFF believes that AgVet chemicals registered in Australia must provide comprehensive information as requested by the APVMA on product labelling. This measure is intended to reduce the burden on farmers during quality assurance auditing processes, allowing them to focus on maintaining high standards of agricultural production.

Recall and contamination

25. The VFF asserts that any chemical recall or contamination affecting farmers, the environment, and/or the wider community must be effectively communicated to mitigate risks. Clear and prompt communication is essential to ensure safety and proper response.
26. In the event of a chemical recall, the VFF believes that the dissemination of information should be a shared responsibility among chemical manufacturers, retailers, and the APVMA. Coordinated efforts are necessary to ensure that all affected parties are informed promptly and accurately.