

SUBMITTED ONLINE

The Senate  
Finance and Public Administration References Committee

**Re: Public Governance, Performance and Accountability (Location of Corporate Commonwealth Entities) Order 2016**

**Terms of Reference Item C: the application of this policy to the Australian Pesticides and Veterinary Medicines Authority (APVMA)**

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9000 members come from all fields within the veterinary profession, including clinical veterinarians who work with companion animals, livestock, exotic animals and wildlife, as well as government veterinarians, academics, and those in pharmaceutical and other commercial enterprises.

The veterinary profession has a clear interest in strong and effective regulation of veterinary medicines to ensure the wellbeing of the nation's animals and people. The AVA is one of the key stakeholder organisations for the APVMA, and we thank you for the opportunity to comment on the proposal to relocate the APVMA under Public Governance, Performance and Accountability (Location of Corporate Commonwealth Entities) Order 2016.

The AVA appreciates the direct access to APVMA that is currently possible as a result of the organisation's location in Canberra, where the AVA's veterinary policy activities are based. We value the level of interaction between the two organisations and the ability to consult directly with the APVMA's management and expert scientists as required.

It would seem similarly advantageous that the APVMA is located near its other key stakeholders, who are the livestock industry peak bodies, and the representatives of the product registrants such as Animal Medicines Australia, all largely based in Canberra.

There are significant reforms in AgVet chemical regulation underway, and under the current APVMA CEO's leadership we feel that there has been great progress in efficiency and productivity. We would be very disappointed to see changes and disruptions that upset this positive direction in which the organisation has been moving.

We fear that the proposed move may result in a loss of specialised scientists from the APVMA who will be very hard to replace. Training new scientists in this specialised regulatory space may result in significant delays to product registrations.

We have consulted with other APVMA stakeholders, including representatives from industry and pharmaceutical companies, and are advised that there could be significant delays to the release of important new agricultural and veterinary treatments should the move take place, owing to the disruption to current registration timelines. This is likely to directly impact on farm gate profitability and animal welfare, by delaying access to important new medicines that promote improved animal health and livestock productivity. There could be flow-on effects to Australia's trading reputation and reduced investment from overseas in new product development, as a result.

In summary, the AVA prefers that the APVMA should remain in Canberra, due to the potential impacts of the proposed move on animal health, welfare, productivity and profitability, and loss of direct access to stakeholders.

The AVA will be pleased to provide further comment on this issue if required.

Dr Melanie Latter  
Veterinary Affairs Manager  
Australian Veterinary Association  
[Melanie.latter@ava.com.au](mailto:Melanie.latter@ava.com.au)