

Dr Joseph Morrall
Department of Agriculture
18 Marcus Clarke Street
Canberra ACT 2601 Australia
02 6272 4442
joseph.morrall@daff.gov.au

Dear Dr Morrall

A reform proposal for the better regulation of agricultural and veterinary chemicals: Stockfeed and pet foods

Australian Pork Limited (APL) is the national representative body for Australian pig producers. It is a producer-owned not-for-profit company combining marketing, export development, research, innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

APL is supportive of this proposal, and believes the proposed changes are sensible and appropriate to the product being regulated. Excessive regulation adds to the cost of stockfeeds. As feed is a major input cost into pig farming and one which farmers have no control over, APL is naturally eager to support proposals such as these which may reduce the on-costs to farmers caused by excessive regulation.

APL believes that a significant number of safe stockfeeds will meet the proposed four part test of manufacturing, ingredients, labelling, and claims, and that this will benefit both producers and buyers of these products. We are particularly interested to see how the application of the manufacturing test will work in practice. APL agrees that avenues for complying with this criterion other than through formal licensing with the APVMA need to be established, and that industry quality assurance programs provide a suitable means of achieving this. APL encourages this trend more generally and is pleased to see it employed in this proposal.

APL also notes that this proposal may improve producer access to “holistic therapies” as a means of controlling or treating day-to-day farming problems. The move away from antibiotics into more holistic therapies has been made more difficult by excessive criteria involved in registration. Should the proposal be implemented, APL will monitor this potential outcome with interest.

Finally, APL is not concerned if an alternative approach is taken for pet food. To the extent that the needs of pet food manufacturers and stockfeed manufacturers differ, APL would be comfortable if the proposal were modified to suit the needs of other industries. For instance, APL would have no problem with the option for a pre-market assessment of pet food products were implemented, and feeds for domestic canines, felines, rodents, aquaria fish and aviary birds would be regulated separately from other stockfeeds.

APL’s other areas of concern with feed, namely, feed grain prices and swill feeding, are not impacted by this proposal.

However, the potential role of feed manufacturers in the transmission of exotic disease, which has emerged as a possible explanation for the spread of the Porcine Epidemic Diarrhoea Virus (PEDv) in North America, remains an ongoing concern. While APL supports the minimisation of undue regulatory burden and costs, if such measures are required to

prevent the spread of exotic diseases such as PEDV, then such measures need to be taken while recognising and minimising the impacts of regulatory burden.

Thank you for the opportunity to make a submission on this proposal. If you have any questions, then please contact me on 02 6270 8803, or by email at deb.kerr@australianpork.com.au.

Yours sincerely

A handwritten signature in black ink that reads "Deb Kerr". The signature is written in a cursive, slightly slanted style.

Deb Kerr
General Manger, Policy