

Director, Strategy and Governance
Australian Pesticides and Veterinary Medicines Authority
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30 April 2025

Re: APVMA Strategic Plan 2025–30

The Australian Meat Industry Council (AMIC) welcomes the opportunity to provide feedback on the APVMA Draft Strategic Plan 2025–30.

As the peak industry body representing the post-farm gate red meat industry, AMIC represents meat processors, smallgoods manufacturers, boning rooms, cold stores, wholesalers, distributors, exporters, and independent retail butchers. Our submission reaffirms our commitment to a science-based regulatory framework that underpins biosecurity, food safety, market access, and long-term industry sustainability.

AMIC acknowledges the strategic plan's focus on regulatory efficiency, transparency, and increased collaboration with international regulators to improve access to AgVet chemicals. However, it is essential to ensure that efficiency does not compromise trade integrity or create risks of misalignment with the requirements of key export markets.

Measure 7, as drafted, seeks to improve the timeliness of regulatory decisions by recognising international assessments. However, it does not clearly outline whether trade risk is a consideration in the evaluation process. While AMIC supports measures that streamline approvals and reduce duplication, any reliance on international assessments must not introduce market access risks, additional compliance burdens, or inconsistency with export requirements, as this could lead to economic losses and trade disruptions.

With over 70% of Australia's red meat production destined for export, regulatory decisions must support continued access to international markets. Trade disruptions not only cause immediate financial impacts but can also undermine Australia's reputation as a reliable supplier, an important factor in maintaining demand and competitiveness in global markets.

The Independent Review Report¹ highlights the importance of balancing efficiency with trade considerations, emphasising that Australia's regulatory system must protect health and the environment while enabling primary producers to remain internationally competitive.

¹ Final Report of the Independent Review of the Pesticides and Veterinary Medicines Regulatory System in Australia, 2021. <https://www.agriculture.gov.au/sites/default/files/documents/agvet-chemicals-review-final-report.pdf>

AMIC also expresses concerns regarding the lack of clarity in the strategic plan regarding the criteria APVMA will use to determine which international regulatory organisations are eligible for recognition. The plan does not specify which regulators will be used, nor how APVMA will ensure that these organisations apply science-driven, risk-based assessment methodologies that align with the regulatory and market access strategy of the Australian agriculture sector. MRLs and withholding periods can vary significantly across countries, and such divergence has historically contributed to technical trade barriers. Given the direct link between AgVet chemical regulation and trade, thorough due diligence is required to avoid outcomes that increase compliance costs or limit access to export markets.

While AMIC supports the objectives of Measure 7 in principle, we strongly recommend that APVMA formally incorporate trade risk analysis into its framework for recognising international assessments. This is essential to ensure that reliance on external evaluations does not lead to regulatory outcomes that undermine compliance with importing country requirements or disrupt established market access.

To ensure that Measure 7 supports industry without creating unintended trade risks, AMIC recommends that APVMA:

- Clearly define mechanisms within Measure 7 to incorporate trade impact assessments as part of the evaluation of international assessments.
- Provide clarity on the selection criteria for international regulatory authorities, ensuring they align with Australia's science-based risk assessment framework and the specific market access requirements of the Australian red meat export industry.
- Ensure that international assessments are only recognised when originating from regulatory authorities that apply transparent, evidence-based methodologies consistent with international standards.
- Maintain transparency in the use of international assessments by providing industry with the opportunity to identify and comment on potential trade risks prior to regulatory decisions being finalised.

AMIC recognises the value of regulatory efficiency and international alignment but maintains that trade risk assessments must remain a core component of APVMA's regulatory framework.

Should you require any additional information or further input, please contact Sue Viana, AMIC's Manager, Animal Welfare & Integrity Systems at sviana@amic.org.au.

Yours sincerely,

Tim Ryan
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Australian Meat Industry Council