



"Together, create and apply solutions"

Invasive Animals Cooperative Research Centre

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Regulation of Australian Agriculture
Productivity Commission
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Submission to the Productivity Commission Inquiry on the Regulation of Australian Agriculture

The Invasive Animals Cooperative Research Centre (IACRC) welcomes the opportunity to provide a submission to this inquiry in relation to its report, Regulation of Australian Agriculture.

The IA CRC is Australia's largest collaborative pest animal research, development and extension initiative comprising 27 government, industry, business and research partners. Its purpose is to counteract the impact of invasive animals through the application of new technologies and by integrating approaches across agencies and jurisdictions.

Key points:

- The current national regulatory system for registration and use of agricultural and veterinary chemicals results in significant inefficiencies and time lags between approvals given at Commonwealth and State levels.
- This position is based on the IA CRC experience in seeking national approval of three new pest animal toxic bait products commercialised through an IA CRC SME partner – Animal Control Technologies Australia. This included a significant lag between APVMA approval and securing approvals in all States for PIGOUT (a 1080 based feral pig bait), and our current experience with the new Dogabait and Foxecute toxic baits (toxic wild dog and fox baits based on para amino-propiofenone (PAPP)).
- A case study of our experience with obtaining national approval of these innovative PAPP baits is attached. It shows that the delay to achieve national approval now exceeds seven months and counting.
- This delay is impeding the timely adoption of pest animal management innovations by farmers, and is impacting an SME business in an industry already constrained by market failure.
- The IA CRC also includes US and NZ partners, and greater harmonisation between US, NZ and Australian regulatory systems would increase the efficiency and reduce the cost of doing business in seeking registration of CRC products in these countries. For example, a new IA CRC feral pig toxic bait – HogGone - to be registered in both Australia and the US through the CRC commercial SME partner – ACTA.
- Regulatory delays were identified as a key risk in the IA CRC independent Department of Industry, Innovation and Science performance review.
- As such, the IA CRC strongly supports draft recommendation 6.2 to make greater use of international evidence including greater reliance on assessments made by trusted comparable international regulators, and recommendation 6.3 for the implementation of a national control-of-use regime for agricultural and veterinary chemicals by the end of 2018.

Yours faithfully

Andreas Glanznig
Chief Executive

Case Study: Delay in obtaining national regulatory approval for new wild dog and fox PAPP technology

Animal Control Technologies (Australia) (ACTA), Australian Wool Innovation (AWI) and the Australian Government through the Invasive Animals CRC, have made major R&D investment to enable registration of PAPP (para-aminopropiophenone) and two bait products containing PAPP for wild dog and fox control in Australia. PAPP is the first new wild dog and fox toxin registered for use in 50 years, and is designed to complement regional 1080 based baiting programs.

PAPP was approved for use by the APVMA on 21 January 2016 and PAPP products are currently legally available in only two States, under the ACTA product names DOGABAIT and FOXECUTE®. This lag in achieving national (ie Commonwealth and State) regulatory approval is further highlighted given that the APVMA public release summary of its evaluation of DOGABAIT and FOXECUTE® was released in October 2015.

Based on current trends it is unlikely that these innovative new wild dog and fox baits will be available in all mainland States before the end of 2016 – almost 12 months from APVMA approval.

Bait availability in each State or Territory is subject to the same controls as 1080 baits (Restricted S7 classification), as follows:*

State	Access	Status
NSW	Local Land Services	Awaiting PAPP Pest Control Order being issued by NSW Government
NT	Accredited Rural Merchants	Awaiting confirmation from NT government
QLD	Local Shire Council Accredited Rural Merchants (limited area)	Awaiting PAPP to be added to list of available chemicals by QLD Dept. of Health
SA	NRM Boards	11 August 2016
TAS	Not available	
VIC	Accredited Rural Merchants	16 March 2016 (advice), 21 June 2016 (updated directions for use)
WA	Accredited Rural Merchants	Awaiting confirmation from WA government

* As of 15 August 2016 based on advice from Animal Control Technologies Australia and IA CRC.