

21 November 2007

Chemicals and Plastics Regulation Study
Productivity Commission
E: chemicalsandplastics@pc.gov.au

Dear Madam/Sir

**Re: National Farmers' Federation Submission to the Productivity Commission's
Chemicals and Plastics Regulation Study**

Thank you for the opportunity to provide input to the Productivity Commission's Chemicals and Plastics Regulation Study.

The National Farmers' Federation (NFF) is comprised of State farming organisations, national commodity councils and a range of associate and affiliate members. The NFF is the peak farm lobby group in Australia, representing producers of all major agricultural commodities. Farmers are one of the largest groups of responsible users of chemicals in Australia.

The NFF notes that we engaged in dialogue with the Productivity Commission while the Chemicals and Plastics Regulation Study was being scoped. The NFF made a submission to the Security Sensitive Chemicals Review, which we note has been made available to you in recognition that this information has relevance to the Chemicals and Plastics Regulation Study.

The NFF would like to provide the following comments, in anticipation of further consultation with the Productivity Commission as the study progresses:

- The NFF believes that a nationally consistent and coordinated methodology in the area of chemicals is desperately needed. National consistency and coordination between Commonwealth and State/Territory governments, statutory bodies and industry groups, is vitally important to achieve a streamlined and user-friendly regulatory structure regulating the use of chemicals.

- The current level of inconsistency and ambiguity in agricultural chemical regulations is caused, in the NFF's view, by a lack of congruity between government agencies. The resulting excessive red tape burden (administrative overheads, and the wasting of valuable time and financial resources – which impact productivity) makes compliance a complex and laborious process for farmers.
- The NFF believes that this study presents an ideal opportunity to incorporate national standards under State legislation, with the aim of simplifying and clarifying compliance.

The NFF understands the importance of regulating the use of chemicals and welcomes the Chemicals and Plastics Regulations Study as an opportunity to restructure and improve current practices. Farmers are committed to using chemicals responsibly and conscientiously. We look forward to continuing our discourse with you to secure efficient, viable and sensible outcomes from this study. In this submission we have outlined a number of key areas of interest to the NFF and our membership.

We also note that the Australian Government is currently in caretaker mode; therefore, while the Productivity Commission is undertaking valuable work on the Chemicals and Plastics Regulation Study, it is presently not in a position to develop or amend regulatory instruments. As such, the NFF looks forward to revisiting, in detail, current and emerging issues pertaining to this study after the cessation of the caretaker period.

The NFF would be glad to discuss with the Productivity Commission any questions you may have regarding this submission. Requests for further information can be directed to Natalie Collard on 02 6273 3855; her email address is ncollard@nff.org.au.

Yours faithfully,



BEN FARGHER
Chief Executive Officer