

26 February 2021

Mr Ken Matthews  
Chair of the Independent Review of the Agvet Chemicals Regulatory System  
Agvet Chemicals Branch  
Department of Agriculture, Water and the Environment  
GPO Box 858  
Canberra ACT 2601

Via email: [reviewsubmissions@agriculture.gov.au](mailto:reviewsubmissions@agriculture.gov.au)

## **RE: Independent Review of the Agvet Chemicals Regulatory System**

Dear Mr Matthews,

WoolProducers Australia (WoolProducers) is the peak industry body representing Australian wool growers across a vast range of issues from animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, and industry development -including research and trade. WoolProducers welcomes the opportunity to provide a submission to *'Independent Review of the Agvet Chemicals Regulatory System'*.

Safe and sustainable wool (and meat) production is a key priority for WoolProducers and our members. Fast and efficient access to safe and effective Agvet chemicals under a framework that maintains both consumer confidence and market access, while enhancing animal and environmental outcomes is a critical business need of our membership.

Following consultation with WoolProducers' members, I am pleased to offer our broad endorsement of the submission provided to you by the National Farmers Federation (NFF), however I wanted to take this opportunity to raise several areas of key importance or specificity to wool producing farming operations.

In recent years WoolProducers Australia has made multiple representations to the APVMA in relation to the emergency use permit approval of the Tredlia Biovet custom footrot vaccine. By way of background the vaccine in question was developed using significant grower levies and is distributed as a mono or bivalent vaccine that is customised to individual producers needs based on serotyping of swab results from a particular group of animals. Due to the specialised nature of this vaccine and the costs associated of registering all (>30) possible combinations in which it could be distributed, the only practical way of providing access to growers was through Emergency Use Permits.

A multivalent vaccine (which is not as effective as the custom vaccine) was recently registered. This multivalent vaccine is considered by many in industry (including its proponents) as having a different use to the Tredlia Biovet custom footrot vaccine. APVMA have chosen to ignore this opinion and denied further emergency use permits for the Tredlia Biovet custom footrot vaccine, sighting that there is a registered "equivalent product" available. Australian sheep are now subject to avoidable suffering as a direct result of the current assessment and emergency use permit policies and the lack of willingness or inability to undertake a holistic approach to assessments.

WoolProducers would welcome streamlined and efficient assessment processes that do not push low volume products towards avenues such as emergency use permits in order to circumvent the bureaucracy and costs associated with full registrations processes.

In consultation with our membership we have discussed concerns in relation to **recommendation 44** of the report:

*The Panel recommends that a humaneness score for vertebrate pest control products, based on the model developed and used by the NSW DPI Vertebrate Pest Research Unit, and adopted by the Australian Animal Welfare Strategy, be presented on the label so that users can make an informed decision regarding the humaneness of a vertebrate pest control product.*

While WoolProducers understands the need for users of pest control products to have such information available we feel that such information **should be excluded from a label**. Generally speaking, by the time a user is reviewing a label they have committed to using the product and are wanting to obtain information on the application method, usage and precautions relating to the usage of the product. Information such as humaneness scores (if deemed necessary) should be conveyed by other means. Further to this WoolProducers would not support the retrospective need for currently registered products to undergo a humaneness score assessment, if such an assessment was to increase costs to primary producers.

I would like to thank you for the opportunity to lodge a submission and would welcome further consultation as the review process progresses.

Please do not hesitate to contact me on 0455 442 776 should you wish to discuss any issue raised in this letter.

Yours Sincerely,



Adam Dawes  
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WoolProducers Australia  
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## **Attachment A**

### **WoolProducers Australia Animal Welfare Statement (November 2018)**

#### **Introduction**

Animal welfare is a key priority for WoolProducers Australia, and as the peak national body for the wool industry in Australia, we believe that the industry will benefit from a united approach to animal welfare. Individuals involved in the wool industry and its supply chains must take a proactive approach to ensure that a positive welfare state is achieved for each animal in their care. WoolProducers encourages industry stakeholders to adopt this statement as their own.

#### **Our position**

Welfare is a broad term that is not easily defined, but it is a state that exists within every animal and therefore must incorporate the physical and mental well-being of the animal. An animal is in a positive state of welfare when it is healthy, comfortable, well nourished, safe and able to express natural behaviours, indicated by science-based evidence. Good husbandry and veterinary practices and sufficient availability of resources enable a positive welfare status to be achieved.

All husbandry activities should be conducted to the highest possible welfare standards, and only be conducted when the lifelong benefit to the animal outweighs any short-term adverse welfare impacts.

It is the responsibility of every person involved in Australia's wool industry to achieve a high standard of animal welfare so that each animal in their care lives in a positive welfare state. As such, WoolProducers adopts the Five Domains of Animal Welfare Model. The Model provides a foundation to guide welfare management objectives that achieve a positive welfare state for each individual animal. We support unbiased scientific, evidence-based approaches to determine clearly defined and measurable welfare states.

#### **Our commitment**

WoolProducers demonstrates our ongoing commitment to the positive welfare states of animals in the wool industry through our policy and advocacy efforts. This is evidenced by WoolProducers' commitment to:

- Supporting the Australian *Animal Welfare Standards and Guidelines for Sheep*;
- Supporting the development of a sheep husbandry best practice guide;
- Endorsing voluntary self-regulatory animal welfare programmes to progress best practice management;
- Supporting required standards of animal management necessary to maintain necessary animal health needs;
- Seeking to achieve sustainable animal welfare improvements by pursuing scientific measurement of minimum standards, at the herd or flock level;
- Achieving animal welfare decision making mechanisms that reflect the credibility of participants;
- Ensuring coordinated animal welfare research efforts;
- Supporting investment in finding an alternative to mulesing and phasing out the practice when a universally accepted alternative is available;
- Promoting the use of pain relief; and,
- Endorsing the IWTO International Wool Specifications.

#### **Implementation**

WoolProducers' Executive and Animal Health and Welfare Committee endorse this Welfare Statement. Responsibility to meet the expectations of this statement lie with all who are involved in the Australian wool industry.