



5. Crop grouping

The Australian Government is improving access to agricultural chemicals and veterinary medicines (agvet chemicals) as part of the Agricultural Competitiveness White Paper. Our plan to build a stronger, more prosperous agricultural sector and economy.

This paper seeks your views on one proposed reform to the agvet chemicals system—developing a schedule of ‘crop groups’ and ‘representative crops’ that would allow the extrapolation of data from one crop to another.

It will be used as a basis for discussion at workshops to be held in Canberra, Perth, Brisbane, Sydney and Melbourne from 27 October to 13 November 2015. If you are unable to attend these workshops and would like to provide feedback on the reforms, please email agvetreform@agriculture.gov.au by 30 November 2015.

Problem / Opportunity

In approving a use of a chemical product, the Australian Pesticides and Veterinary Medicines Authority (APVMA) considers information (usually in the form of scientific trial data) that shows that the product is suitable for use in relation to a specific pest or disease in a specific crop or host animal. Generally, this assessment is completed for each use of a product, whether for different pests in the same crop or animal, or the same pest in differing crops. This occurs for related crops (in both genus and use/pest terms) such as leeks and onions.

It is possible to avoid the additional cost of generating specific crop data for a common pest or residue in a crop that is related to another crop for which data is already available. For example, it may be possible to register a chemical for use on leeks if data is already available for use of the chemical on spring onions and shallots. Reducing this cost would increase the number of potential uses for chemical products and improve access to chemicals.

What we have heard

The United States of America has adopted an approach where data for a small number of crops is considered representative of the use of the product across a larger group of related crops.¹ This has allowed a greater variety of crop uses for a given product than is available in Australia for the same product. This, in part, is one of the reasons why the US does not have the same chemical access problems as Australian emerging or niche crop or animal species producers.²

The chemical companies that would be affected by any change to processes for registration have asked for further detail on whether they would retain control of the uses of their product. Companies were particularly concerned about potential liability for their product and the potential that new products may not come to the Australian market at all.

¹ See Federal Register 40 Code of Federal Regulations Part 180.41.

² An issue commonly referred to as the ‘minor use’ problem.

(There is no proposal for companies to be required to include uses on a label that the registrant does not consider should be included on a label.)

The proposed reform measure

The Department of Agriculture and Water Resources has funded APVMA to explore development of a schedule of 'crop groups' and 'representative crops' that would allow the extrapolation of data from one crop to another. The department would support the APVMA in this work by making any legislative changes necessary, for example, by allowing amendments to existing labels containing the representative crop(s) through simple, low cost, process.

Through careful selection of the representative crops (for instance, those most popular within the national diet), the risks of using a chemical on other less common (or minor use) crops would also be managed. This is achieved as the exposure to the same hazard (the chemical product) is reduced with the smaller popularity of the other crops in the Australian diet.

Registrants would not be obliged to include a crop group on an existing or new product label. Chemical companies will retain responsibility for determining how their product should be represented and used.

The department is interested in exploring means for extrapolating the concepts of crop grouping to species or pest groupings. We believe that the concept of grouping for pests could yield similar benefits to livestock production as is expected for crop and horticultural production.

Next steps

We have been encouraged by stakeholder input on this measure to date and believe it is a reform that could be delivered in the early stages of the wider reform package.

We will be hosting a series of workshops for all interested stakeholders to attend and provide their views on the proposed reform measures. To attend one of these workshops please fill in a [registration form](#).

If you are unable to attend one of the workshops, or would like to provide feedback separately, contact the department via email at agvetreform@agriculture.gov.au.

When providing your feedback you might like to consider addressing the following questions:

- Do you support the proposed reform in its current form or would you like further detail?
- If you don't support it, could the reform be amended to achieve your support? If so how?
- Are there any unintended consequences arising from this reform?
- Does the proposed reform result in new issues for you?

Please provide your feedback by 30 November 2015 so we can consider it before finalising a policy paper outlining a comprehensive reform package. The final policy paper will be released for stakeholder comment in the first quarter of 2016.