

9 June 2017

Ms Jeanette Radcliffe  
Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
**CANBERRA ACT 2600**

Dear Ms Radcliffe

CropLife Australia (CropLife) is the peak national industry organisation representing the agricultural chemical and biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers and formulators of crop protection and agricultural biotechnology products. The plant science industry provides products to protect crops against pests, weeds and diseases, as well as developing crop biotechnologies that are key to the nation's agricultural productivity, sustainability and food security.

The plant science industry is worth more than \$18 billion a year to the Australian economy and directly employs thousands of people across the country. CropLife Australia is a member of CropLife Asia and part of the CropLife International Federation of 91 CropLife national associations globally.

CropLife's members' crop protection products are primarily regulated by the Australian Pesticide and Veterinary Medicines Authority (APVMA) and not often directly involved in the regulatory activities of the National Industrial Chemicals Notification and Assessment Scheme (NICNAS). CropLife does, however, have a strong interest in any proposed changes to NICNAS due to those changes often having a direct or indirect impact on the broader chemical regulatory system. CropLife supports the positions of Accord Australasia Ltd and Chemistry Australia with regard to this Inquiry.

CropLife considers the specific requirements of industries regulated by NICNAS could be better administered by the Australian Competition and Consumer Commission, and other existing agencies, to ensure consumer safety while supporting competitiveness, innovation and growth for the industry. In the absence of this kind of reform, CropLife considers the *Industrial Chemicals Bill 2017* to appropriately address significant regulatory issues for the sector, including animal testing and early actions to streamline assessment of low-risk polymer ingredients.

It is pleasing to see that the recommendations made in the Productivity Commission's 2008 research report on Chemicals and Plastics Regulation are finally being addressed.

Further policy and technical refinement is, however, still required to ensure subsequent regulations streamline regulatory effort, align with international approaches, reduce unnecessary costs and encourage innovation.

Please do not hesitate to contact CropLife's Director of Agricultural Chemical Policy, Mr Alastair James ([alastair.james@croplife.org.au](mailto:alastair.james@croplife.org.au)), should you require clarification or elaboration on any aspect of this submission.

Yours sincerely

(SIGNED)

Matthew Cossey  
**Chief Executive Officer**