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29 June 2015

Ms Kareena Arthy  
Chief Executive Officer  
Australian Pesticides and Veterinary Medicines Authority  
PO Box 6182  
**Kingston ACT 2604**

Dear Kareena

**Re: Proposal to move the APVMA away from Canberra**

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession, including clinical veterinarians who work with companion animals, livestock, exotic animals and wildlife, as well as government veterinarians, academics, and those in pharmaceutical and other commercial enterprises.

The veterinary profession has a clear interest in strong and effective regulation of veterinary medicines to ensure the wellbeing of the nation's animals and people. The AVA is one of the key stakeholder organisations for the APVMA, and we thank you for the opportunity to comment on the proposal to move the APVMA away from Canberra.

The AVA appreciates the direct access to APVMA that is currently possible as a result of your organisation's location in Canberra, where the AVA's veterinary policy activities are based. We have been extremely impressed with the level of communication between the two organisations and the ability to consult directly with the APVMA's management and expert scientists as required.

It would seem similarly advantageous that the APVMA is located near its other key stakeholders, who are the livestock industry peak bodies, product registrants and their representatives such as Animal Medicines Australia, all largely based in Canberra. There are significant reforms in AgVet chemical regulation underway, and under your leadership we feel that the APVMA has been making great progress in efficiency and productivity. We would be loathe to see changes and disruptions that upset this positive direction in which the organisation has been moving.

We fear that the proposed move may result in a loss of specialised scientists from the APVMA who will be very hard to replace. Training new scientists in this specialised regulatory space may result in significant delays to product registrations.

We have consulted with other APVMA stakeholders, including representatives from industry and pharmaceutical companies, and are advised that there could be significant delays to the release of important new agricultural and veterinary treatments should the move take place,

owing to the disruption to current registration timelines. This is likely to directly impact on farm gate profitability and animal welfare, by delaying access to important new medicines that promote improved animal health and livestock productivity.

We are also concerned that an industry-funded regulator would be spending money from industry to fund a government's decentralisation agenda, should the move go ahead.

As a result, the AVA cannot support the proposed move, preferring that the APVMA should remain in Canberra to continue the great progress being made.

The AVA will be pleased to provide further comment on this issue if required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Johnson', written in a cursive style.

Robert Johnson  
**President**