

## Submission to the Australian Pesticides and Veterinary Medicine Australia's Engagement Model and Draft Strategic Plan 2025-30

In February and April 2025, Cancer Council Australia made two submissions to the Australian Pesticides and Veterinary Medicines Authority (APVMA). The February consultation was seeking feedback on APVMA's revised stakeholder engagement model. The April consultation sought feedback on the clarity and appropriateness of the APVMA draft Strategic Plan 2025–30.

As a cancer control organisation, we believe that the purpose of chemical regulation is to protect human, animal, and environmental health. Therefore, our primary focus when providing feedback to APVMA relates to the effect that pesticides and veterinary medicines may have on cancer in humans, and we recognise this needs to occur in the context of having an effective, robust, and trusted regulatory system for agricultural and veterinary chemicals. We believe that human health protection is fundamental to regulating agricultural and veterinary chemicals and this should be reflected the work of APVMA.

Cancer Council's submission to the APVMA stakeholder engagement model included the following:

- We supported the APVMA's aim of delivering a more accessible, collaborative, and transparent experience for stakeholders.
- Human health protection is fundamental to regulating agricultural and veterinary chemicals.
  This should be reflected in any stakeholder engagement model.
- The model should ensure the inclusion of stakeholders in the advisory group whose primary concern is the protection of human health.
- The APVMA should work with the State and Territory Work Health and Safety (WHS) regulators and public health departments to ensure that those who use pesticides at work are appropriately protected from occupational exposure.

Cancer Council's submission to the APVMA Draft Strategic Plan 2025-30 included the following:

- Health protection is fundamental to regulating agricultural and veterinary chemicals, and this should be clearly outlined in the Plan's vision statement.
- Health and safety outcomes for people, animals and the environment should be prioritised under the strategic pillar on maintaining confidence in agricultural and veterinary chemicals.
- A potential measure regarding the number of adverse events, incidents or exposures of agricultural and veterinary chemicals is recommended to better assess the safety of registered products or chemicals.
- Greater specificity is needed on actions to update and coordinate safety information across jurisdictions.
- The strategic pillar on building foresight capability should be more inclusive of a wide range of perspectives, including non-industry stakeholders.

- The APVMA should contribute to peer-reviewed scientific literature, either directly or by supporting independent researchers through funding or collaboration.
- Basic employment metrics, such as staff turnover, tenure, and internal promotion rates, should be measured and made publicly available.

Cancer Council Australia has also been successful in seeing Dr Matthew Govorko being appointed to the new APVMA Advisory Group representing public health and occupational health and safety interests.

Information about the progress of these consultations can be found on the APVMA consultation webpage: Renewing the APVMA's engagement model, and APVMA draft Strategic Plan 2025–30