

## DEPARTMENT OF AGRICULTURE AND WATER RESOURCES (AGVET CHEMICALS)

### Consultation on Streamlining Regulation of Agricultural and Veterinary Chemicals

#### - Comment on proposals for changes

Name: Dr Rodney B. Besier

Organisation: Brown Besier Parasitology Pty Ltd

Contacts:

Dr R.B.Besier, Veterinary Parasitologist

23 Cuthbert St, Albany WA 6330

Ph. 0427 778 406

Email: [brown@bbpara.com.au](mailto:brown@bbpara.com.au)

Date: 22 August 2018

---

I wish to comment in detail on only one of the Proposals (No. 2), but note that I support the approach recommended by APVMA for amendments to the other Proposals, and consider them in general to be fair, necessary and timely.

#### **Proposal 2 - Accreditation of assessors**

It is my view that:

- A system to ensure appropriate qualifications, expertise and disclosures is essential to achieve technically-competent, fair and consistent assessments of registration applications, and should be welcomed by committed assessors.
- An audit and compliance program to underpin an accreditation system is also reasonable, provided that this is at reasonable cost to assessors, and does not require excessive participation time.
- If an audit-backed system is to include penalties for non-compliance, a structure for identifying departures from requirements should be developed and made available to assessors.
- The opportunity for input by current (and potential) assessors into development of the structure, standards and requirements for the system would be beneficial and appropriate.
- The expansion of potential roles for assessors would represent an efficient way for APVMA to obtain expert input on a wider range of matters, with an assurance of expertise and performance.
- Costs to assessors for accreditation would need to be proportional to the volume of assessment work offered, as obviously a substantial fixed cost would disadvantage those who may receive relatively few assignments. If a single annual renewal fee was to be charged, this would therefore need to be relatively small to encompass those with small work volumes; alternatively, a fee could be notionally levied for each assignment, ie, a deduction identified as part of the final payment, but provided that it did not entail a net decrease compared to current payments. Working within a

rigorous system where penalties potentially apply requires adequate reward to justify continued maintenance of expertise and currency with industry issues.

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

---

R.B. Besier BVSc, PhD  
Veterinary Parasitologist