

Submission

By



to the

ERMA 2009/10 Fees and Charges Review

on

May 2009

Agcarm  
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# **ERMA 2009/10 Fees and Charges Review**

## **SUBMISSION BY AGCARM Inc**

### **Key Points in Submission**

The fee increases will be reflected in improvements in efficiencies and services provided in a timely manner.

A single regulator would reduce compliance costs and reduce work duplicated by ACVM and ERMA.

### **1. Introduction**

1.1. Agcarm welcomes the opportunity to comment on the 2009/10 fees and charges review, published in April 2009.

1.2. Agcarm is an industry association of companies which manufacture, distribute and sell agrichemicals and veterinary medicines. Member companies are committed to ensuring that these products are used safely, effectively and sustainably. Agcarm represents 30 member companies ranging from global enterprises to small New Zealand-owned companies.

### **2. Submission Comments**

2.1. We are mindful that it has been three years since fees were last reviewed but note that some fees have increased significantly in this time. For example, there has been a three-fold increase for rapid assessments. This large increase may have an unintended impact on agriculture by reducing the number of innovative, low-risk products entering the market.

2.2. Agcarm members expect that there will be a corresponding improvement in efficiencies in the services that ERMA provides; in particular meeting application timelines.

2.3. Reducing unnecessary cost and increasing efficiency and productivity are stated objectives of the current government's strategy for growth. Agcarm believes that a single regulator would reduce costs to both the applicant and the government.

2.4. A single regulator would reduce our members' compliance costs and reduce work duplicated by the two government agencies.

2.5. We also believe that your review is an opportunity to restate the importance of constantly reviewing all expenses and finding ways to produce better outputs at lower cost. This approach is followed in the private sector, and should be standard practice in the government sector. We trust that this is the approach at ERMA.

Again, thank you for the opportunity to provide comments on behalf of our members.

We look forward to reading the summary of submissions.

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