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## Application workshops

The ACVM Group is planning a series of workshops for February 2002. The objective of the workshops will be to update stakeholders on changes to the requirements for applications for registration resulting from the commencement of the ACVM Act and to listen to any suggestions for improvements on the current processes.

The proposed workshops will be designed for regulatory affairs personnel, consultants and all others who submit applications for the registration of agricultural compounds. The workshops will therefore focus primarily on providing advice on the essential requirements for applications and also on the mechanisms and processes that should be followed to maximise the opportunity for an application to be approved.

Topics currently proposed for the workshop include:

- the ideal application (plant compounds)
- the ideal application (veterinary medicines)
- information waivers – when to submit them and how to justify your request
- research approvals/ provisional registrations
- class determinations.

Dates, times and other details on the proposed workshops will be provided in the next issue of *Agvetlink* or advertised on the website. Please submit any suggestions you have for other topics that should be covered to:

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*AgVetLink* is produced at least six times annually by the MAF Food Assurance Authority's Agricultural Compounds and Veterinary Medicines Group. The newsletter is of special relevance to those interested or involved in all aspects of animal remedies and pesticides. It contains regular updates on implementation of legislation, notifications, new standards and policies, consultation, international agreements, and other information.

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## Cross-referencing and accessing information

The ACVM Group has had a number of queries about cross-referencing information recently. The following is intended to clarify the operational rules applied in this regard.

Any information that is not the subject of data protection and that is held by the ACVM Group may be cross-referenced to support another application. It is **the responsibility of the applicant** to prove to the ACVM Group that there is a sound technical basis for cross-referencing information, especially where the information has been provided by another party.

Cross-referencing information can result in information waivers being granted. Information waivers can make the registration process faster and less expensive in that an information waiver is likely to reduce the number of trials needed to support an application.

However, it is not necessarily true that cross-referencing will reduce the actual cost of registration as the

ACVM Group consideration of these requests is charged on an hourly basis. A cross-reference request (usually in the form of an information waiver) may require the ACVM Group to consult with technical experts. In these cases the cost of obtaining advice is passed on to the applicant. It is always an option for the applicant to provide expert advice – where this happens the credentials of the expert should be included for consideration, and a statement covering independence and conflict of interest included.

Cross-referencing information in no way gives an applicant access to another company's data without their permission – it simply allows the ACVM Group to access information provided by one company in support of an application from a second company, provided the basis for a cross-reference has been proved.

With the implementation of the ACVM Act, the Animal Remedies and Pesticides Acts have been replaced by a single piece of legislation. This has

the potential to confuse the rules around cross-referencing further and was considered by the Boards some time ago. Where there is **data protection** for an active ingredient under either of the previous Acts, this will carry through until the end of the data protection period.

Further, a plant compound (pesticide) application will not be able to cross-reference a veterinary medicine product where there is still data protection in place for the pesticide. This rule also applies to veterinary medicines (animal remedies) cross-referencing plant compounds.

ERMA NZ is also able to use data supplied to the ACVM Group for the purposes of considering the transfer of substances to the HSNO Act or for the approval of substances under HSNO. Data supplied to ERMA NZ carries with it the same protections afforded to it by the ACVM Group – either **data protection** under the ACVM and HSNO Acts, or commercial in confidence (protected under the Official Information Act).

### Dry cow intramammary products

**Because of new information recently received by the ACVM Group, there will be a requirement for licensees of dry cow intramammary products to provide some additional information in order to address residue and efficacy concerns. The ACVM Group is in the process of writing to all licensees to explain the requirements in detail and the timeframe for response.**

## Proposal to transfer animal remedies licences and pesticide registrations

On page 6 of the October issue of *AgVetLink* the ACVM Group proposed the development of regulations to transfer the existing licences and registrations of trade name products. There were no written submissions on the proposal, but the ACVM Group received verbal support for the proposal from a number of individuals and organisations. There were no objecting views.

Consequently, MAF will prepare the advice to Cabinet. MAF will propose that the Regulations come into force on 1 July 2002 to facilitate the change from the old licensing and registration annual fees to the new registration annual fees. The commencement date will also allow essential changes in licence or registration conditions to be made before the transfer, in particular the conditions on some in-feed antibiotic products.

## GLP compliance for residue data

from field trials submitted after 1 January 2003

It has recently been noted that there is some confusion with respect to requirements for residue data from field trials to be submitted after 1 January 2003.

At present, the relevant requirements are set out in the following standards and guidelines:

- *ACVM Registration Standard for Residue Data;*
- *Registration Guidelines for Residue Data: Veterinary Medicines;*
- *Registration Guidelines for Residue Data: Plant Compounds;*
- *ACVM Research Standard.*

It has been brought to our attention, however, that the standards are misleading because of the difference in scope of good laboratory practice (GLP) covering plant compounds and

veterinary medicines. Internationally, the specifications for field trials and studies, i.e. good field practices (GFP), are included in GLP. On the other hand, specification for field trials and studies for veterinary medicines are included in a separate standard for good clinical practice. For that reason the ACVM Group would like to confirm the following:

- The above standards and guidelines have been mandatory since July 2000.
- Data for the **laboratory component** of residue trials submitted after 1 January 2003 must be GLP compliant (i.e. all analytical laboratory trial studies must be carried out by a GLP accredited laboratory).
- Data for the **field component** of residue trials submitted after 1 January 2003 must comply with

the *ACVM Research Standard* but accreditation to GLP for the purposes of field work is not essential (unless specifically stated). This data should comply with the principles of the field component of GLP (as expressed in the ACVM requirements).

If field trials have been carried out by a GFP accredited person, in its assessment of the subsequent application, the ACVM Group would not require full examination of all trial documentation because audits associated with accreditation would justify the rigour of the submitted trial data. There is no intention, however, to set such a rigorous standard and the ACVM Group will continue to examine the trial documentation to the extent necessary to ensure that the work was carried out to the *ACVM Research Standard*.

## Antibiotic resistance

The ACVM Group advised all licensees of products containing zinc bacitracin and macrolides that their licences must be updated (by 1 May 2002) to include new conditions that manage antibiotic resistance. The details of the review for these products can be found on the ACVM website at <http://www.maf.govt.nz/acvm/subject/antibiotic-resistance/index.htm>.

The licences for the four top priority antibiotics have already been completed. These involve products that contain:

- avoparcin
- avilamycin
- fluoroquinolones
- virginiamycin.

The Ministry of Health is considering the review report of three other anti-microbial families. This includes the ionophores, flavophospholipols and quinoxalines. The licensing requirements for products containing these three ingredients will be reviewed when the report is finalised.

This will complete the review of all in-feed antibiotics. All those that are significant to antibiotic resistance in humans have been made prescription products, and the licensees have been directed to remove therapeutic use and growth promotion claims from their labels. Changes will be effective from July 2002 at the latest.

## Antibiotic sales statistics

When the licences of antibiotics are updated, there will be a requirement to provide annual sales statistics based on monthly sales. It is suggested that licensees begin to collect the information now so that they will be able to meet the new requirement.

## OECD pesticide residue zoning scheme

Over the last two years, a small group of residue experts from OECD countries have been developing a global zoning scheme to define areas in the world where pesticide residue behaviour could be considered comparable, and therefore where residue trials data could be used within each zone for MRL-setting purposes, irrespective of national boundaries.

Dave Lunn, who was involved in the initial residue harmonisation workshop in York (1999) where this zoning scheme was first proposed, was invited to join this Steering Group. His participation is supported by MAF Food's ACVM Group and by the NZ Vegetable & Produce Growers and the NZ FruitGrowers Federations.

At the first meeting, the Steering Group confirmed that it should be possible to define geographical zones for the purposes of extrapolating residue behaviour but that further work would be needed to validate this concept and to define the appropriate zones.

The second meeting of the Steering Group, held in Paris (29-30 March 2001), refined the JMPR residue data sets intended for use in validating the proposed zones and supported the use of a statistician to analyse the data to estimate residue variability within and between the proposed four zones.

Initial indications from the statistical analysis suggested that the proposed zones, based on average climate, were not appropriate because they were too general. After consulting with several of the European members of the Working Group, it was agreed to assess the variability associated with estimated climatic conditions close to harvest for each residue data set. This approach was suggested to investigate the option of proposing various temperature, rainfall and sunshine 'bands' within which residue trials could be considered equivalent.

Recognising that this was a significant departure from the initial concept, and because the statistical analysis had identified a number of anomalies, a special review meeting of the Zoning

Steering Group was arranged in Geneva on 28 September 2001. After spending considerable time discussing the statistical analysis and attempting to explain the anomalies, the meeting concluded that the available data was not sufficient to separate out the various factors that could contribute to residue variability, although there was a strong indication that climate may not have such a major influence.

The meeting agreed to collect additional information (residues at 'day 0') for the residue data sets available, and to test the hypothesis that compared to other factors, climate has little influence on residue variability (thus supporting the suggestion that residue data based on the same good agricultural practice should be globally 'transportable').

It was agreed that this 'refined' analysis would be considered at the next meeting of the Working Group (April 2002) where, hopefully, a series of recommendations could be developed for consideration by OECD and FAO.

## Comments on amendments to the ACVM Regulations

In the October issue of *AgVetLink* the ACVM Group proposed some amendments to the ACVM Regulations 2001 to:

- include some additional groups for exemption from registration;
- amend some definitions; and
- add substances to the GRAS lists in Schedule 7 parts A and B.

Only two written submissions were received. The first concerned the proposed exemption from registration of unregistered trade name products used by veterinarians. The respondent pointed out that further limitations

must be imposed to ensure that unregistered products are used by veterinarians only when there is no equivalent product registered in New Zealand and only prescribed in individual cases in which it is essential for the immediate welfare of the animal. The ACVM Group supports this view and will modify the exemption accordingly.

The second submission concerned the definition of raw and composted biological wastes. The respondent was concerned about the implications of defining biological wastes and considered it necessary for interested

and affected parties to discuss the definition before it is incorporated into the Regulations. The ACVM Group accepts this view and will not recommend any definition until the interested and affected parties can be consulted.

Apart from the concern over the definition of raw and composted biological wastes, the amendment of the Regulations must be progressed. The ACVM Group will prepare policy papers for Cabinet to consider before the end of the year. The new Regulations are not likely to commence before April 2002.

## Global zoning for pesticide residue behaviour

Fruit and vegetable growers are set to be among the beneficiaries of international proposals to set up global zoning for pesticide residue behaviour. Those who are likely to benefit particularly are farmers who grow more minor crops such as olives or lettuce, according to MAF Food's National Manager (Plant Residues), Dave Lunn.

Under the scheme, the world would effectively be carved into different zones for the purposes of using residue trials to measure pesticide residues in food, an important part of the pesticide registration process in most countries.

This means that each individual country should be able to accept data from trials carried out in other 'similar' countries instead of the current practice of insisting that at least some of the testing be done at home. In New Zealand's case, the present system normally requires that at least half the pesticide residue trials be done within this country.

This creates delays in getting new pesticides into the marketplace (while these trials are being conducted) and in some cases can even result in the most appropriate pesticides not being available because the cost of doing local residue trials is too high.

For instance, in the areas of pesticides for minor crops, it often isn't worthwhile for a chemical company to carry out residue trials here for what may be a relatively small market. It can cost thousands of dollars to add a new crop to a pesticide label.

Under the scheme, New Zealand regulators should be able to accept data from trials done in any other country in 'our zone' and from a global perspective, other countries in 'our zone' should be able to accept New Zealand data.

Up till now, virtually all countries in the world have wanted at least some of these residue trials conducted nationally, and these requirements have varied from country to country.

Dave Lunn says, "In Europe the general requirement is for eight trials while the United States usually ask for between one and 20 trials in up to 13 different regions. Other countries say 'we don't really have any hard and fast rules but as long as you can show the environment's the same, we'll probably accept overseas information'".

Therefore, regulators internationally have come up with a plan to cut down on unnecessary trials and pesticide residue-nationalism. Dave Lunn is part of an OECD Steering Group effectively looking at a global map to decide what areas of the world have the same environmental conditions and therefore where similar residue decay behaviour can be expected (see article on page 4). The work of this group has been strongly supported by the New Zealand fruit and vegetable growers' organisations.

According to Dave, "Everybody is saying that our country is different from everybody else's country. We say is there not a way of using a map to decide that when you're spraying cabbages with a pesticide in certain areas, the residue behaviour should be the same and therefore we can use their data to support our use of that pesticide".

The group is looking at drawing up a tentative map of residue zones and over the next 6-8 weeks, finding enough residue data to plug into the map so they can see if the proposed zones can be justified.

Luckily the FAO has about ten years' worth of residue trials on a range of pesticides and different crops, used internationally in setting maximum

residue limits for pesticides, that the group can use.

The Steering Group plans to meet again in Holland next year to analyse the data and decide whether the initial zones are suitable or whether they will have to redraw the map and start again. If all goes well, the plan could be finalised by the end of 2002.

Dave Lunn says, "If things look good next year, we may even be able to change the ACVMG pesticide registration standards here in New Zealand to get the scheme up and running before the rest of the world".

### Import approvals

**We are working on import approval processes in order to simplify procedures at the border. It is becoming obvious to us that the application forms are too numerous, and there could be a more effective way to capture and record imported products. Changes will cover the documentation required to import products into New Zealand.**

**The ACVM Group will be working in conjunction with MAF Quarantine and MAF Biosecurity to ensure that the process is efficient and cost effective. Watch this space.**

## Pesticides – fodder cereals

The ACVM Group understands there is a move towards growing cereals for fodder rather than for grain. This change is due to the increase in dairy farms in the South Island where farmers are looking to maximise stocking rates and hedge against potential feed shortages.

Proprietors of registered pesticides (particularly fungicides) with a label claim to use on cereals are reminded that the cereal withholding period for such products is based on cereals

grown for grain. No residue assessment has been undertaken on whether such a withholding period is acceptable for cereals grown for fodder. In addition, in a number of instances, the current withholding period is not good agricultural practice (GAP) for fodder cereals.

The ACVM Group has sought advice on GAP withholding periods for fodder cereals. Based on this advice, it appears a 28 day withholding period would equate to GAP for this use.

Products will be required to show two withholding periods: one for cereals grown for grain and the other for cereals grown for fodder.

Consequently, **before** proprietors of these products recommend use of their products on fodder cereals, they must have them approved by the ACVM Group. Such applications would fall into the application type C8 (change in withholding period). Appropriate data sets and/or scientific arguments should accompany the application.

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## Update: Mutual Recognition Agreement for Good Manufacturing Practice with EC

Both MAF and the European Medicines Evaluation Agency (EMA) for the European Community (EC) continue their commitment to complete the transitional period for the implementation of the mutual recognition agreement (MRA) on the assessment of GMP at the end of December 2001. Brian Pidford visited the Veterinary Medicines Directorate (VMD), the Medicines Control Agency (MCA) and the EMA in October to prepare for the completion of the final stage of the transition.

Under the agreement, GMP inspections of manufacturers of veterinary vaccines and veterinary pharmaceuticals exporting products to the EC that are carried out for the ACVM Group will be accepted by the EMA for the member states of the EC. European inspectors will no longer visit New Zealand to carry out GMP inspections for these manufacturers.

However, one type of inspection remains outside the agreement and this has been a concern to manufacturers of veterinary vaccines. Veterinary vaccines are subject to Official Batch Release in the EC. Under the Official Batch Release process there are

provisions for each batch to be sampled and tested by a government laboratory prior to release to the market.

These provisions have been implemented in a variety of ways by member states and there is no harmonised system for Official Batch Release. The UK approach has been for the VMD to introduce a different inspection process called a QA/QC inspection to replace sampling and testing of individual batches of veterinary vaccines. Under the MRA, visits were expected to continue by the VMD inspector to conduct QA/QC inspections for Official Batch Release.

Agreement with the VMD was reached that, in principle, the VMD could accept New Zealand conducted QA/QC inspections for Official Batch Release until the European system becomes a harmonised one. It was agreed that a transition, separate from the MRA GMP transition, would probably be required for transfer of expertise and assurance of equivalence. The VMD meanwhile would be extending the interval between QA/QC inspections out to 18 months. It was also agreed that the

next VMD inspection (probably in late 2002) should be used for training and evaluation of New Zealand QA/QC inspections.

Arrangements were concluded for the observation of GMP inspection in New Zealand by an inspector for the EMA. This visit took place in October and work is continuing on the reports and follow up from that process.

A presentation on the New Zealand GMP process was given to a meeting of European GMP inspectors at the EMA. Another meeting at the EMA dealt with issues identified by a report prepared for the EMA on equivalence between New Zealand and EC legislation to control veterinary medicines.

In late December, Katrin Nodop, Principal Administrator, EMA, will visit New Zealand and we shall complete a joint report to the Joint Committee for the MRA recommending the signing of the agreement for veterinary medicines. In addition, final documentation will be agreed and the format of the MRA maintenance programme will be developed.

## Compliance

### Operating principles

The Agricultural Compounds and Veterinary Medicines (ACVM) Group is responsible for the registration of agricultural compounds and veterinary medicines, and monitoring their importation, manufacture, sale and use.

The ACVM Group compliance process is aimed to ensure that the responsibilities above are met and that all the products on the New Zealand market satisfy the registration requirements of the Agricultural Compounds and Veterinary Medicines Act 1997.

To enable us to achieve this we have developed some compliance operating

principles. These principles give an outline of the process we undertake when a compliance incident is reported to the Group.

If you want information on how the ACVM Group manages complaints and compliance issues, the ACVM compliance operating principles can be downloaded from the website through the following pathway:  
<http://www.maf.govt.nz/acvm/legislation/acvm-act/infopapers/compl-op-principles>

### Incidents

A number of compliance issues have been reported over the last quarter. Most are resolved after contact with the proprietor but some are currently

being investigated with a view to possible prosecution. In particular the ACVM Group is investigating:

- an unregistered product that contains glucosamine and chondroitin;
- an unregistered product that makes therapeutic claims for diseases that cause pain and distress.

We wish to advise that the ACVM Group does not look on these incidents lightly and will take action where there are significant breaches of the legislation. The penalties for non compliance are higher under the ACVM Act than they were under the Animal Remedies and Pesticides Acts. These are \$30,000 for an individual and up to \$150,000 for a company or organisation.

## Labelling Guide for Toxic Substances

The Ministry of Health has updated the *New Zealand Labelling Guide for Toxic Substances*. This guide provides the basis for determining the acceptability of statements designed to protect human health on labels of plant compounds (e.g. pesticides) and veterinary medicines. The ACVM Group currently provides advice on these statements on behalf of the Ministry of Health (for those products that are not Deadly or Dangerous Poisons).

Because of changes to the guide, the ACVM Group will be changing labels when they are submitted or during the transition process to comply with the updated document. The principal change involves the first aid statement, as vomiting is no longer advised. Instead labels should not advise vomiting, but should advise that the National Poisons Information Centre should be contacted. First Aid statements should include the telephone number of the National Poisons Centre 0800 POISON (0800 764 766).

There has also been a change in the way that the labels of Deadly and Dangerous Poisons are handled. These need approval from both the Ministry of Health and the Pesticides or Animal Remedies Boards (whichever is relevant). In future, the Ministry of Health will directly contact applicants with their requirements. In a parallel operation, the Board advice regarding labels will still come from the ACVM Group and applicants are advised to ensure that they have both sets of comments prior to finalising labels, which they will send directly to Health for their sign-off. Health will then send the labels that they have signed-off to the Boards for final approval.

### NZIER Report

**The report commissioned from the New Zealand Institute of Economic Research by MAF Policy is due for release very soon. The report covers the expected impact of the HSNO and ACVM legislation on agriculture in New Zealand and will provide a useful benchmark for future surveys. It will be available free of charge from the ACVM part of the MAF website, so if you are interested make sure you are a 'subscriber' and get advised of any website updates.**

## Update: Committees and meetings

### Codex Committee on Veterinary Drug Residues in Foods (CCRVDF)

Dr Bill Jolly and John Reeve (National Manager - Toxicology and Residues) will represent New Zealand at the 13<sup>th</sup> Session of the CCRVDF in Charleston, South Carolina, USA, from 4 - 7 December 2001. Dr Jolly is the current leader of the delegation, but it is envisaged that John Reeve will take over leadership in the future.

A major issue to be discussed is the slow pace at which the Codex system operates, and ways to improve this. Some MRLs in the process are up for discussion and, hopefully, they will progress through the system. However, it has been noted that many substances that were on the priority list have had to be removed from the list because industry does not seem to be willing to submit the necessary data to have the residues properly evaluated.

### Animal Behaviour and Welfare Consultative Committee

Meetings of this committee act as a forum to keep organisations as diverse as teaching, primary production, research and governmental institutions informed about activities in relation to animal behaviour and welfare. Neil Kennington is the ACVM/MAF Food representative on this committee.

The last meeting was held at LIC Newstead and included presentations from the representatives and from Malcolm Bailey on his position as Agricultural Ambassador.

Of note:

- The details of a major welfare and environmental standards initiative for the dairy industry were released. This is initially a voluntary programme but has great potential to set a new level of animal welfare on dairy farms.
- Research initiatives, including studies on feed additives to alleviate stress in livestock and the subsequent improvement in performance and meat quality, were outlined.
- Professor David Mellor summarised his research into the assessment of distress caused by castration methods in calves. This showed some important insights into a common husbandry procedure of some welfare significance.

### 18th Conference of Residue Chemists Canberra 31 October - 2 November

This is a biennial Australasian conference of regulatory chemists (largely in government and state agencies) responsible for food residue and contaminant issues, analytical chemists in government and state testing agencies and also interested industry participants. Mike Clear, National Manager - Veterinary Residues, ACVM Group, and Warren Tully, Technical Assessor - Chemistry, attended the recent conference in Canberra.

Mike had the honour of chairing the session on Monitoring and Regulatory Issues. Some 44 oral papers and 30 posters were presented. They covered topics as diverse as new analytical methods and techniques; natural toxins and contaminants; laboratory proficiency testing, standard and accreditation; interpretation and application of ISO standards; and lastly regulatory issues. Both veterinary medicines and pesticides were equally represented. A keynote speaker from the EU Reference Laboratory in Holland was an invited guest. The conference was extremely useful for both ACVM Group attendees to keep up to date with Australasian developments and new perspectives in residue and food safety issues.

Additionally, Mike Clear had useful discussions with the residue assessment group at the National Registration Authority with a view to obtaining greater alignment of veterinary medicine residue data interpretation between the ACVM Group and the NRA at the time of dossier assessment.

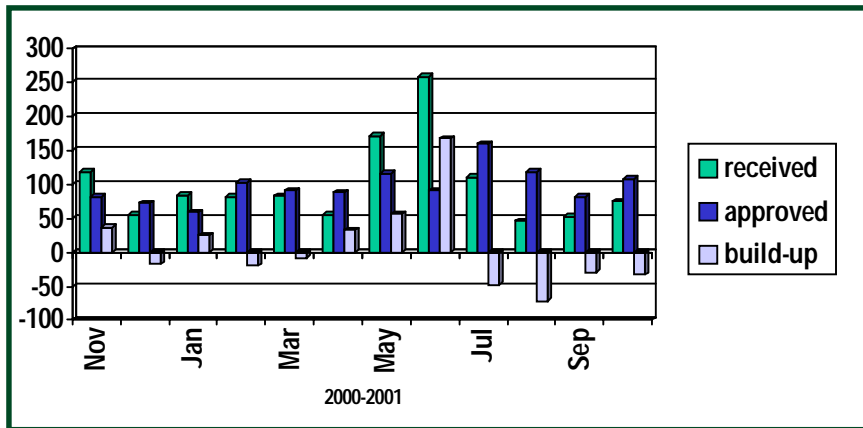
### Specialised reports from the ACVM Group

**Just a reminder that, in addition to the information provided on the website, the ACVM Group can provide specialised reports on request and at the cost of the person making the request. Requests need to be emailed to the ACVM Group (acvm@maf.govt.nz) with details of the information required. You need to be specific about the timeframe, the types of products that you are interested in, and the details that you need (name and address of proprietor, etc.). Fees are based on \$110 per hour plus GST and payment should be made on provision of the estimate of cost (unless you are an approved creditor).**

## Operational overview

The ACVM Group continues to have high workloads. As can be seen from the graph below, there is still a reasonable build up of applications in the system – the after effects of the huge influx of applications in June of this year, prior to the implementation of the ACVM Act.

Although the application queue is high, the Group is meeting prescreen and Decision Making Committee timeframes in most cases. This is based on a turn around deadline of 15 working days.



The ACVM Group has received very few veterinary medicine and plant compound applications submitted under the ACVM Act. Veterinary medicine and plant compound approvals as at 31 October are as follows:

	VM	PC
A1 and A2 (new products)	1	1
B1 and B2 (similar to existing products)	7	0
Low risk	2	0
Provisionals	6	5

Overall, the bulk of applications in the system are type Cs (changes to existing products). For the months of September and October, there were 48 animal remedy and 49 pesticide applications approved. In addition to this, 8 animal remedy A1/A2s and 11 pesticide A1/A2s were approved. Type B1 pesticide applications were high (there were 34) due to the discontinuation of dual trade name products. Registrants were required to submit single applications or cancel their products.

### Registration and Product Data Sheets

We would like to remind all applicants that the ACVM Group requires an **electronic copy** of the Registration and Product Data Sheet (PDS), in addition to the paper copy. Because the PDS is a legal document, if there are any alterations required on the form, the Group will require a new and complete PDS from the applicant.

## Website update

- Registration or licensing dates have now been included on the **register of animal remedies and pesticides**. Registers are updated fortnightly.
- There is a new section for **compliance incidents** – this includes the ACVM Group policy on how we will approach any reported incidents and a reporting format (see article on page 7).
- If you want to be advised by email of any new or updated documents on the website, make sure you **'subscribe'** on the ACVM home page. The field for doing this is found in the bottom right of the screen.
- An up to date **contacts list** for all of the ACVM Group can be found at <http://www.maf.govt.nz/acvm/about/contact.htm>.

## Annual fees

**Annual fees for pesticides and animal remedies for 2001/2002 were due in July 2001. If payment of these fees is not received by 21 December 2001 you will be contacted and advised of the additional steps that will be taken. This is likely to be suspension or revocation of existing licences and registrations. Please contact Sarah Smyth (phone 04 460 8753, fax 04 460 8771, or email [smyths@maf.govt.nz](mailto:smyths@maf.govt.nz)) if you have any queries regarding your products.**



## Happy Holidays!

*We hope that all of our AgVetLink recipients get the chance to take a good break over the holiday period and that the new year finds you all happy and well!*

*The ACVM Group*

### CHRISTMAS CLOSEDOWN

The ACVM Group office will close Friday, 21 December 2001, and will reopen Monday, 7 January 2002. There will be no ACVM Group staff in the office over this period. If there are any urgent matters, contact Debbie Morris, Director ACVM Group, on 021 888 267.

AgVetLink

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