



26 May 2021

**AgForce Submission to the proposed
(a) Pest Management Activities Regulation 2021 and
(b) Poisons and Prohibited Substances Regulation 2021,
under Queensland Government's *Medicines and Poisons Act 2019*.**

INTRODUCTION

AgForce Queensland Farmers Limited (AgForce) is a peak organisation representing Queensland's cane, cattle, grain, and sheep and wool producers. The cane, beef, grain, sheep and wool industries in Queensland generated around \$7.3 billion in on-farm value of production in 2018-19. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Almost 5,900 farmers, individuals and businesses provide support to AgForce through membership. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, and contribute significantly to the social fabric of regional, rural and remote communities.

AgForce commends Queensland Health for the three-year consultation with industry during the formation of the Medicines and Poisons Bill 2018 and 2019, *Medicines and Poisons Act 2019* and the associated Regulations and Standards affecting agriculture. The collaborative consultation has resulted in comprehensive and reasonably practical regulations that aim to protect public safety.

In response to the most recent public consultation period, this AgForce submission provides a list of seven recommendations for further improvement to the proposed pest management and poisons Regulations and Standards.

RECOMMENDATIONS

Recommendation 1: At least 12 to 24 months transitional arrangements and an extensive extension campaign, especially across the rural sector, for the new requirements for pest management activities.

There needs to be at least 12 months or more transitional arrangements, supported by multi-industry extension programs to enable affected persons to implement required activities such as substance management plans, signage, national training competencies, etc. In particular, the new requirements across the rural sector affecting fee-for-service pest management activities needs to be widely promoted across multiple media and rural networks.

Currently there are very few Registered Training Organisations RTO's across Queensland with skilled trainers offering one of the required competencies AHCPMG312 – Apply poison baits for vertebrate pest control in rural and environmental landscapes. A transitional arrangement period greater than 12 months is required to enable additional RTO's to scope, acquire skilled trainers and deliver this course where there is demand.

PART A

AgForce Submission to the proposed Pest Management Activities Regulation 2021 under Queensland's *Medicines and Poisons Act 2019*

Recommendation 2:

**Amend 'approved person' definition for seasonal workers. (Schedule 1, Part5, Sections 14-16)
Seasonal workers who apply pesticides to fruit, vegetables or grain provided they have successfully completed competencies OR work under the supervision of the landholder or licenced technician.**

Seasonal workers are required during short periods of time such as harvest and planting. There is limited opportunity to acquire the required national competencies, due to distance from Registered Training Organisations, time to complete the courses, training cost and casual labour payments while conducting training. Seasonal workers should be permitted to use pesticides under the supervision of the landholder or a licenced technician. The current definition is too onerous, which requires pesticide competency **and** supervision by a licensed technician.

Recommendation 3: For persons working under a *Biosecurity Act 2014* biosecurity program, extend authorised activity to all “biosecurity matter”, not just ants. (Schedule 1, Part6, Sections 17-18)

In addition to fire ant and electric ant national eradication programs in Queensland, there are other ongoing eradication programs such as red witchweed, national four tropical weeds eradication and Panama disease tropical race 4. Previous eradication programs included Asian honey bee and oriental fruit fly. <https://www.daf.qld.gov.au/business-priorities/biosecurity/plant/eradication-surveillance-control> . This regulation needs to facilitate preparedness and treatment for incursions of all high risk biosecurity matter, not just limited to “ants”.

Recommendation 4: AgForce commends Section 67 which permits a pest management licence for a granted term and a refund formula for less than the full term. This provision is for a part-time or short duration pest management licence, as per Schedule 2. Otherwise the annual fee of \$303.50 is excessive for a person conducting occasional pest management on a rural property or during a harvest season.

If a person provides a fee-for service pest management activity on a rural property, they are deemed a pest management technician. The refund provision is suitable for situations such as working during a harvest period or an outbreak (eg. mice or locust plague).

Recommendation 5: Disposal of empty pesticide containers (Sections 45 -47). Insert 46 (c) disposing of the container in another lawful way “or industry stewardship program such as drumMUSTER and ChemClear”.

Insert reference to the national industry stewardship program, drumMUSTER for eligible empty containers and ChemClear for unwanted pesticides <https://www.drummuster.org.au/container-recycling/eligible-containers/> . Address the anomaly where the drumMUSTER rinsing standard requires triple rinsing, whereas Section 46 of the Pest Management Regulation 2021 requires rinsing “several times”.

PART B(i)

AgForce Submission to the proposed Poisons and Prohibited Substances Regulation 2021 under Queensland's Medicines and Poisons Act 2019

Recommendation 5: The list of "approved persons" in Schedule 4 appears to be comprehensive. Does the chief executive have the authority to add additional categories of "approved persons" to carry out activities with regulated substances? This may be required as new agchem S7 products or situations arise.

PART B (ii)

Departmental Standard dealing with restricted S7 poisons for invasive animal control

Recommendation 6: In the Standard, clarify which notification requirements have precedence. The Departmental Standard requires notification to all adjoining and adjacent neighbours, whereas some Local Governments require notification of all neighbours within 1.5km of bait location. For example, Gympie Regional Council conditions for notification
<https://www.gympie.qld.gov.au/documents/40005057/41389383/1080%20Baiting%20Advice%20Sheet.pdf>

Recommendation 7: For large scale baiting programs, it is not feasible to record GPS location of all baits. Recommend removing GPS location as an "acceptable solution" on page 7 of the Standard. Or only require the GPS location of the baited area, rather than each bait.

CONCLUSION

AgForce welcomes the opportunity to provide a submission to the proposed Pest Management Activities Regulation 2021, Poisons and Prohibited Substances Regulation 2021 and Departmental Standard dealing with restricted S7 poisons for invasive animal control. The series of online factsheets assist with explaining the new requirements and the new terms such as general approval, approved persons, authority holders and pest management technicians. AgForce can foresee further extension and explanation of the Regulation and Standard requirements to end-users will be necessary.

For any questions or further discussion on this submission, please contact Marie Vitelli, AgForce Senior Policy Officer, phone 0429 062 852 or email: vitellim@agforceqld.org.au

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