

SDRC Submission to the State Development, Natural Resources and Agricultural Industry Development Committee on the Medicines and Poisons Bill 2019

Southern Downs Regional Council (SDRC) provides a 1080 baiting service to the region's rural landholders to assist in the control of invasive pest animals. Fluoroacetic acid (1080) is a regulated substance under the Medicines and Poisons Bill 2019 (the Bill). Council offers the following points on the Bill.

- Medicines and Poisons (Pest Management, Poisons and Other Regulated Substances) Regulation 2019 (the Regulation)
 - It is noted that provision is made for disposal of waste from a bait by an authorised officer (s21) or a landholder (s24). Section 24 is critical; it would be impractical and costly for local government authorised officers to dispose of untaken bait material following the conclusion of a baiting program. Local government authorised officers may have a need on occasion to dispose of unused bait material, however, it is the landholder that must bear responsibility for any collection and disposal of untaken baits.
 - Part 4, Division 3 is concerned with the wholesale or retail supply of a regulated poison. Sections 33-37 detail delivery and supply requirements. Council is of the view that there are inherent risks in making 1080 baits available for sale through any other means than by local government authorised officers. In the Southern Downs Region, landholders are able to obtain 1080 baits from Council with limited notice, be it via purchase of manufactured baits at cost price or provision of 1080 impregnation service for fruit, grain or fresh meat baits. Providing additional scope for retail supply of manufactured baits reduces stringency of controls and increases the risk of misuse. Demand for manufactured baits is low and the risk in broadening access would seem to greatly outweigh any perceived benefit.
 - Section 24 (4) (b) points to *Departmental standard 1: Use of restricted schedule 7 poisons for invasive animal control* for how landholders may lay baits on land. It is noted that *Departmental Standard 1* is to be made. Council would appreciate the opportunity to also provide input into the process of making the Standard.
- Medicines and Poisons Bill 2019 (the Bill)
 - Chapter 4, Part 2 mandates the requirement for a Substance Management Plan for a *regulated place*. Schedule 6, Column 1 of the Regulation lists *a place where a person carries out a regulated activity with a regulated poison under a general approval*. Section 68 of the Bill states that a regulation may prescribe general approvals. It is therefore not apparent whether Councils will be required to prepare a substance management plan for the storage, provision, handling etc. of 1080 for invasive animal control. Council is of the view there is no benefit to SDRC in changing current arrangements in favour of a substance management plan approach. It would add to Council's administrative burden and risk exposure. Local government officers are currently authorised by the Department of Agriculture and Fisheries (DAF) under the *Biosecurity Act 2014* and receive training by DAF in order to become

authorised. Further, local government pays an annual precept to DAF for a range of services. The provision of 1080 and training to Council officers are some of those key services. Council is of the view that its officers should continue to be trained and authorised by DAF and is not supportive of a requirement for local governments to have a substance management plan.

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