



4 June 2019

Committee Secretary
State Development, Natural Resources and
Agricultural Industry Development Committee
Parliament House
George Street
Brisbane Qld 4000

Via e-mail; sdnraidc@parliament.qld.gov.au

Re: Queensland Medicines and Poisons Bill 2019

Dear Sir or Madam,

Thank you for the second opportunity to respond to the proposed Medicines and Poisons Bill 2019 and the Medicines and Poisons (Poisons and Pest Management) Regulation 2019.

GrainCorp is Australia's largest listed Agribusiness. GrainCorp accumulates, stores and handles and markets grain to both domestic and multi-billion dollar export markets.

GrainCorp handles over 10M tonnes of grains, oilseeds, pulses, meals pa. Pest management for these products is a cornerstone of our business.

GrainCorp employs 115 Pest Management Technicians (PMT) nationally and 34 in the state of QLD.

The main roles of our PMT's are grain fumigation for insect control and associated activities such as structural treatments, grain treatments with contact insecticides and vermin and weed control.

GrainCorp has reviewed the proposed legislation and information sheets, please find the following response to the proposed legislation.

Medicines and Poisons Bill 2019

GrainCorp does not have any additional comments relating to the proposed Medicines and Poisons Bill 2019.

Medicines and Poisons (Poisons and Pest Management) Regulation 2019

Chapter 2 Regulated Substances

The Medicines and Poisons Bill 2019 defines Regulated Substances (section 17 Meaning of regulated substance) as a medicine, poison, prohibited substance, fumigant or pesticide. Chapter 2 of the Regulations (Regulated Substances) does not mention the substances listed in section 17 of the Bill. The differences between the term "regulated substance(s)" in the Bill and the Regulations should be clarified.

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Section 76 - Fumigant

We note that ozone, carbon dioxide and nitrogen are prescribed to be a fumigant when they are contained in cylinders. We note that;

1. Not all cylinders of carbon dioxide and nitrogen are used as a fumigant. Cylinders of carbon dioxide and nitrogen may be used in food handling operations as a carrier (ie post-mix drinks) or as a food preservation agent (ie keep lettuce fresh).
2. Carbon dioxide and nitrogen that is used as a fumigant may come from sources other than cylinders (ie nitrogen generators)

We would propose consideration be given to amending the section to include these substances when they are used as a fumigant (fumigation activity) under the section 19 (2) of the Bill.

Section 86 – Post-harvest treatment of products

We note that not all post-harvest activities involve the product being “processed for a commercial purpose”. In the case of our business we are “storing” products in their harvest state and do not typically process them. We suggest that this section be amended to include the words “.. stored or..” before “processed for commercial purpose.”.

Sections 95, 115 (d) and 119 (3)

These sections all refer to leakages of fumigants and pesticides. In respect to leakages of a fumigant, the containment of any leakage should be to the extent that there is no exposure beyond the established risk area for the fumigation (as required in section 114 – Establishing risk area).

Subdivision 4 Finalising fumigation

Section 120 (b)

Vent the fumigation space in a way that leaves the concentration of the fumigant in the space no more than the safe exposure concentration for the fumigant

Can this statement be made clearer for fumigation spaces that have product in them to ensure the concentrations within the product are at a safe exposure concentration? This would then align with re entry into a warehouse and ensure that when product is moved from the fumigation space there is no risk to exposure of the fumigant.

Again, thank you for the opportunity to provide input to the above legislation review. We trust the above differences can be catered for in either clarification of the proposed legislation or some other suitable administrative means.

We look forward to future opportunities for detailed consultation regarding these important changes including a meeting to discuss these details. This can be addressed via myself via the following contacts.

████████████████████ phone ████████████████████ or mobile ████████████████████.

We look forward to hearing from you soon, in the meanwhile please advise if I can provide any further information.

Yours faithfully,

Geoff Masters

National Pest Control Manager

Graincorp Operations Limited