



5 June 2019

AgForce Submission

- **Medicines and Poisons Bill 2019**
- **Medicines and Poisons (Pest Management, Poisons and Other Regulated Substances) Regulation 2019**
- **Medicines and Poisons (Medicines) Regulation 2019**

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Committee Secretary
State Development, Natural Resources and Agricultural Industry Development Committee
Parliament House
George Street
Brisbane Qld 4000
Email: sdnraidc@parliament.qld.gov.au

Re: Submission to the :-

- **Medicines and Poisons Bill 2019**
- **Draft Medicines and Poisons (Pest Management, Poisons and Other Regulated Substances) Regulation 2019**
- **Draft Medicines and Poisons (Medicines) Regulation 2019**

INTRODUCTION

AgForce Queensland Farmers (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016-17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40 per cent of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

Biosecurity, including the impact and costs of pest and disease management are an ongoing major concern to primary producers. It is essential for producers to have access to a range of cost-effective and safe pesticides for management and prevention of pests, weeds and diseases. Although safe use of pesticides is very important, usage regulations need to be streamlined, practical and minimise risk.

Alongside this state reform of agvet chemical usage has been a national harmonisation of regulatory requirements for agvet chemical registration and usage. Both AgForce and National Farmers Federation have provided a series of submissions to components of this national reform, including off-label use, veterinary prescribing compounds and minimum training and licensing requirements for occupational

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users of agvet chemicals. The single national regulatory framework is outlined here <http://www.agriculture.gov.au/ag-farm-food/ag-vet-chemicals/domestic-policy/history-of-coag-reforms/regulatory-model>.

Queensland Health’s Medicines, Poisons & Therapeutic Goods Project Team has actively consulted with AgForce over the last two years in the policy development of this legislative reform. In March 2017, AgForce provided a submission to the Consultation Paper for the proposed *Medicines Poisons and Therapeutic Goods Bill 2015* (“MPTG Bill”). Through a series of submissions, briefings with policy staff in the Health Protection Branch, many of the issues arising from agricultural and veterinary uses for regulated poisons have been addressed. This has resulted in very few queries or requested changes to the current Bill 2019 and associated Regulations.

RECOMMENDATIONS*Poisons (Pest Management, Poisons and other Regulated Substances) Regulation 2019*

Section No	Current Regulation	Recommended changes
22(3b) (page15)	A local govt employee may supply S7 poison (in accordance with part 4) to an owner or occupier of private land for managing weeds or vegetation on the land.	Expand to “.....for managing weeds, vegetation on the land <u>or other biosecurity matter.</u> ” This enables local govt staff to supply S7 poisons to help manage existing pests such as:- (a) chlorfenvinphos to cattle dips for controlling cattle tick and buffalo fly. (b) zinc phosphide to control mice and rodent plagues. (c) preparedness for future outbreaks of priority biosecurity matter that requires whole of community response.
Part 4 Division 2 (page 18)	Wholesale buying of regulated poisons	“Wholesale” needs to be defined in the dictionary. Is this defined by quantity or volume? There are ninety (90) Schedule 7 active constituents registered over 420 agchem products used in Queensland. For example, diquat is used for pre-harvest dessication and broadleaf weeds in a wide range of crops with aerial and ground equipment. Drum size for diquat products range from 5L, 20L, 100L, 200L to 1000L. Container size for zinc phosphide mouse baits used in agricultural crops range from 5, 10, 15, 20, 125, 150 to 500kg.

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Part 7 Division 2 Miscellaneous Section 74 (page 36)	Advertising poisons. A person must not advertise an S2, S3 or S4 or high-risk poison.....	S4 prescription vaccines for animals should be exempt of this requirement and can be advertised. For example, Zoetis's Ultravac BEF vaccination for Bovine Ephemeral Fever (three-day sickness) in cattle. This virus is spread by biting midges across Northern Australia. Promotion of this preventative S4 vaccine would help reduce losses in productivity when BEF is prevalent.
Schedule 1 Departmental Standards (page 76)	Competency requirements for approved persons undertaking regulated activities with poisons, pesticides and fumigants [to be made]	This standard should be made in consultation with the national Harmonised Agvet Chemicals Control of Use Task Group HACCU http://www.agriculture.gov.au/ag-farm-food/ag-vet-chemicals/domestic-policy/harmonisation-minimum-training-licensing-requirements and with PestSmart Pest Animal Controller (PAC) Training Project https://www.pestsmart.org.au/national-wild-dog-action-plan/projects/pest-animal-controller-pac/ . Acceptable competencies require an option for the Chief Executive to approve equivalency competencies (such as a Commercial Operators Licence or similar).

If the Bill and Regulations are passed by Queensland Parliament, AgForce recommends a transition period of 12 months or more for approved persons, part-time and full-time pest management technicians from rural regions to understand and comply with the new usage and training requirements.

CONCLUSION

AgForce welcomes the opportunity to provide a submission to the State Development, Natural Resources and Agricultural Industry Development Parliamentary Committee on this significant reform to Medicines and Poisons legislation.

For any questions or further discussion on this submission, please contact Marie Vitelli, AgForce Biosecurity Officer, phone 07 [REDACTED] mobile [REDACTED] or email [REDACTED]