



13 September 2016

The Productivity Commission

Re: Regulation of Australian Agriculture

This submission is for consideration to be given to implement National legislation to standardise agricultural and veterinary chemical training for pesticide users so that the qualification requirement in each state and territory is the same.

Agricultural chemicals and veterinary medicines play an essential role in maintaining and improving productivity of agriculture and related industries in Australia. State and Territory governments control the use of these chemicals and set legislation for pesticide users to hold chemical training accreditation. As a result there is no national approach to chemical training requirements throughout Australia and every State and Territory has a different set of rules which is regulated by their various government departments. Most current legislation requirements for chemical training require AQF (Australian Qualifications Framework) Level 3 units of competency for accreditation of pesticide users.

Chemical products are assessed by APVMA for their impact on human health, the environment, and trade, as well as for their efficacy. A harmonised approach to chemical training throughout Australia should lead to a reduction in risk to human health, the environment and trade from chemical misuse and an increased financial benefit for stakeholders from the efficient application of pesticides within agricultural, horticultural and conservation and land management systems. Regular quality training of users is one way of increasing the probabilities of these beneficial outcomes being achieved.

A study in 2013 by Adjunct Professor Mr John Kent found that better outcomes for stakeholders could be improved if the Control of Use regulatory framework and the training framework were considered together for any future reviews. In regards to regulation, Kent found that there is a *“need to introduce effective and nationally consistent Control of Use legislation as quickly as possible. This should incorporate national licencing of pesticide users.”*

Draft recommendation 6.3 from the Australian Productivity Commission investigation into Regulation of Australian Agriculture states: *“The Australian, state and territory governments should expedite the implementation of a national control-of-use regime for agricultural and veterinary chemicals (which includes increased harmonisation of off-label use provisions), with the aim of having the regime in place in all states and territories by the end of 2018.”*

With this in mind this submission hereby seeks serious consideration be given to implementing a national standard of chemical training regulation and this be done in a similar (or identical) timeframe as the control-of-use legislation.

A challenge within the industry is to lift the profile of chemical training so that it is better valued by all operators within the agricultural chemical space. The Kent review found there are four drivers to uptake of chemical training with the main one being that it is a legal requirement (e.g. licence needed to access and apply products). Many quality assurance programs also promote chemical training as best practice and a way of demonstrating due diligence. Regular re-accreditation (5 years) ensures better knowledge and skill

level for more efficient and effective pest control. Australia wide guidelines and legislative requirements would lead to better outcomes for agriculture as a whole so that development of chemical training resources, trainer professional development and all people involved in the industry have access to nationally consistent regulations, training resources and outcomes.

Yours sincerely

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