

PUBLIC HEALTH SERVICES BRANCH

Enquiries to: Peter Dyer
Environmental Health Adviser
Telephone: (07) 3234 0963
Facsimile: 907) 3234 1480
Our ref: PD042123
File No: EH-LEGI-0028
Your Ref: -

Dr R Hall
Director Public Health & Chief Health Officer
Department of human Services
GPO Box 1670N
MELBOURNE VIC 3001

Dear Dr Hall

Thank you for the opportunity to comment on the release of the discussion paper *Review of the Health Act 1958: A new legislative framework for public health in Victoria by the Department of Human Services*.

I have limited my response specifically to the legislative basis for licensing of pest management technicians (technicians). For consistency and uniformity in the licensing of technicians throughout Australia you may wish to consider adoption of some or all of the licensing requirements introduced via new pest management legislation into Queensland recently. The legislation is the *Pest Management Act 2001* and the *Pest Management Regulation 2003* and is available at www.legislation.qld.gov.au

Queensland Health has legislated for the Units of Competence endorsed by the Australian National Training Authority (ANTA) as outlined in the National Environmental Health Forum monograph titled *National standard for licensing pest management technicians* to be the minimum requirements for licensing in this State.

In addition to the Unit PRMPM11 requirement for fumigation activities, Queensland Health requires that persons submitting Unit PRMPM11 also have an accompanying 'Declaration of Assessment' from a Registered Training Organisation (RTO) which indicates the site environment in which competence was demonstrated eg aircraft, building, burrows, chamber, container, ships hold, silo, soil, stack. Site restrictions are then placed on the technicians licence. Without this requirement, it is conceivable that a technician who is competent to undertake soil fumigation could also legally undertake fumigation in aircraft and ships holds which are significantly more complex and dangerous. This requirement has been supported by industry and agreed upon by RTO's.

Office
10th Floor
Queensland Health Building
147 Charlotte Street
Brisbane Q 4000.

Postal
GPO Box 48
Brisbane Q 4001

Phone
(07) 323 40938

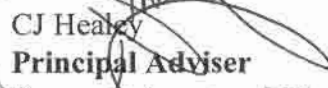
Fax
(07) 323 41480

Queensland Health has also legislated that technicians undertaking timber pest control activities must also obtain the Units of Competency PRMPM06, PRMPM08 & PRMPM10. This requirement is mandatory and is currently being implemented via a 2 year transition phase. The requirement for timber pest units of competency is also a recommendation outlined in Australian Standard *AS3660.2-2000 Termite management Part 2: In and around existing buildings and structures-Guidelines*.

Significantly, with a lengthy 2 year transition phase, Queensland Health has been able to legislatively require that all existing fumigators and pest control operators holding restricted licences under the previous legislation must upgrade to the ANTA units of competence.

I trust the above information may be of assistance. Should you wish to discuss any of the above information further please contact Mr Peter Dyer of my office on (07) 3234 0963.

Yours sincerely


CJ Healey
Principal Adviser
Drugs, Poisons and Therapeutic Goods
Queensland Health

27 / 10 / 2004

Mr Christopher