

1 May 2017



AgVet Chemicals Task Group Secretariat
Council of the Australian Governments
Via email: agvetpolicy@agriculture.gov.au

Re: Minimum training requirements for all users of Restricted Chemical Products (RCPs) and Schedule 7 AgVet chemicals

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the *Draft Proposal for the National Harmonisation of Minimum Training Requirements for all Users of Restricted Chemical Products (RCPs) and Schedule 7 (S7) Agvet Chemicals*. The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF supports COAG's efforts to ensure that the minimum training requirements for all users of RCPs and S7 agvet chemicals are nationally consistent and in line with the level of risk posed by these chemicals. It is crucial to note that the success of a nationally harmonised system will depend on the implementation process and compliance framework. Further, it is important to regularly review minimum standards so that they are up-to-date.

The *Draft Proposal* has incorporated a lot of the ideas proposed by NFF in our initial response to the *COAG review of the national chemical regulation framework*. To further engage with industry, the NFF would like to invite the Agvet Chemicals Task Group to have a face-to-face meeting with the NFF Agvet Chemicals Taskforce. During this meeting, all draft proposals regarding the *COAG review of the national chemical regulation framework* could be discussed with key industry stakeholders.

The NFF would particularly encourage to further explore the following topics in a face-to-face meeting:

- Rules of engagement with the agricultural industry;
- Clarification and definition of "supervision of itinerant and casual labour";
- Detailed discussion within the farming community around training exemptions for users of S7s and RCPs to ensure that workers are safe while enabling farmers to engage casual and itinerant labour without facing unnecessary barriers to employment;
- Discussion about the quality of training and general compliance monitoring;

- Consideration of strategies to ensure application compliance of RCPs and S7s among users with low literacy, numeracy and/ or language skills;
- Provision of federally coordinated leadership at a national level to implement a new framework for minimum training requirements.

The NFF welcomes future engagement with the COAG consultation process regarding the harmonisation of minimum training and licensing requirements. Please contact us for further information and for arranging a time to meet with the NFF's Agvet Chemical Taskforce.

Yours sincerely,



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