

High-risk or sensitive places

Medicines and Poisons Act 2019

The *Medicines and Poisons Act 2019* (MPA) commenced on 27 September 2021. Under the MPA pest management technicians (PMTs) are required to hold pest management activities for high risk and sensitive places. This fact sheet provides information to PMTs about requirements for obtaining these activities.

High-risk and Sensitive places

PMTs carrying out pest management activities at high-risk or sensitive places must either hold the authorisation on the licence or be **supervised** by a PMT who holds the authorisation at these places.

The pest management activity for high-risk or sensitive places are intended for experienced licensed PMTs who are required to:

- prepare Activity Risk Management Plans (ARMPs) to ensure pest management activities are carried out safely
- supervise other licensed PMTs carrying out pest control activities at high risk or sensitive places.

Pest management businesses may therefore choose to have a limited number (appropriate for the size of the business) of experienced PMTs (licensed for more than **2 years**) with an authorisation for high-risk or sensitive places.

Note that treatment of timber pests or pest birds do not require the authorisation to treat urban pests at high-risk or sensitive places and no ARMP is required to be prepared at this stage.

It is important to note that licenced PMTs **do not need to hold** the high-risk or sensitive place activity on their licence when undertaking pest management activities at high-risk or sensitive places **if they**:

1. follow an ARMP that has been prepared for the activity by a PMT who holds the authorisation; and
2. carry out the activity under the supervision of another PMT who holds the authorisation.

Definitions

A **high risk place** is a place used for:

- Intensive or high density livestock farming
- Wholesale food manufacturing or large food processing facility.

A **sensitive place** is a place used for:

- A residential aged care facility
- A hospital
- A primary or secondary school
- A childcare centre

Note that High-risk places relating to food processing are intended to capture those with a potential to affect a large number of people or with distribution over a large geographical area; it is not intended to capture small, local facilities.

See examples of high-risk and sensitive places in the table below:

| Place type | Examples of high-risk and sensitive places | NOT considered as high-risk or sensitive places. |
|---|--|--|
| High-risk – livestock farming | <ul style="list-style-type: none"> • Egg or meat poultry farms when in sheds or enclosures • Piggeries • Cattle or sheep feedlots • Dairy sheds | <ul style="list-style-type: none"> • Hobby farms • Small scale farms not operating on a commercial scale • Dairy or cattle operation in educational settings |
| High-risk – food processing and food manufacturing | <ul style="list-style-type: none"> • Canneries • Breweries • Large baked goods factories • Large food manufacturing incl frozen food • Produce packing sheds • Wholesale fish markets • Facilities where unpackaged raw food products are handled (distribution centres for supermarkets) | <ul style="list-style-type: none"> • Retail food outlets: Cafés, bars and restaurants • Supermarkets • Small, local food manufacturing • Petfood manufacturing |
| Sensitive places | <ul style="list-style-type: none"> • Nursing homes • Primary/secondary schools • Childcare/daycare centres and kindergartens • Hospitals with inpatient service | <ul style="list-style-type: none"> • TAFE or universities • Government agencies • Dentists' or doctors' surgeries • Diagnostic facilities (x-ray, pathology or radiology services) |

Supervision of PMTs carrying out pest management activities at high-risk or sensitive places does not have to be onsite directly, PMTs can be supervised by using an electronic communications device e.g. phone, two-way radio.

Activity Risk Management Plans (ARMPs) are required to assist in identifying and managing known and foreseeable risks associated with pest management activities at high-risk or sensitive places. ARMPs are also required for fumigation activities at any place.

Before carrying out a pest management activity at a high-risk or sensitive place PMTs must ensure:

1. an ARMP has been prepared for the activity at the place

2. the PMT who prepared the plan holds the relevant authorisations for preparing ARMPs at the place
3. they have the contact details of the PMT authorised to supervise the activity.

During the activity PMTs must follow the requirements of the ARMP and if necessary, contact the PMT who holds the relevant authorisation to undertake pest management activities at high-risk or sensitive places and the ability to supervise, to seek clarification or advice on any issues the PMT is unsure of.

Templates supporting the preparation of ARMPs can be found at [Pest management application forms, templates and fees | Queensland Health](#).

Applying for High-risk or Sensitive place activities

PMTs may apply to add the activities using the [Application for a Pest Management Licence \(health.qld.gov.au\)](#). Applications for high-risk or sensitive places will need to include supporting evidence as outlined in the tables below and be accompanied by the applicable fee for amending a pest management licence.

| PMT requirements for high-risk or sensitive places | |
|--|--|
| Option 1 | Provide copies of the Cert IV in Urban Pest Management competencies: <ul style="list-style-type: none"> For sensitive places <ul style="list-style-type: none"> • CPPUPM4003 – Assess and advise on pest management options for sensitive operations; and • CPPUPM4005 – Implement and monitor pest management plans for sensitive operations For high-risk places <ul style="list-style-type: none"> • CPPUPM4004 – Assess and advise on pest management options for complex operations; and • CPPUPM4006 – Implement and monitor pest management plans for complex operations OR Provide copies of equivalent Cert III in Urban Pest Management competencies |

PMT requirements for high-risk or sensitive places

Option 2

Note – Option 2 is only available if application made before the new Standard is in force*.

If employed by a pest management business – provide a letter from their employer advising that the licensed PMT holds the necessary knowledge and experience (licensed as a PMT for 2 or more years) to:

- Prepare an Activity Risk Management Plan (ARMP) for high-Risk or Sensitive places; and
- Supervise other PMTs undertaking pest management activities at High-Risk or Sensitive places; and
- Provide **documentary evidence** of past pest management activities at high-risk or sensitive places e.g. pest advice notices and treatment records. **Five records in the last two years** for each activity being applied for.

OR

If a self-employed PMT (licensed as a PMT for 2 or more years) – provide **documentary evidence** of past pest management activities at high-risk or sensitive places e.g. pest advice notices and treatment records. **Five records in the last two years** for each activity being applied for.

Documentary evidence must be sufficiently detailed to identify the licensed PMT (name or licence number) who carried out the activity. Acceptable evidence includes pest control advice notices and treatment records. Generic statements provided under a company name (e.g. invoices) may not be acceptable.

* Please ensure each piece of evidence is highlighted as either a high-risk or sensitive place

* For PMTs undertaking pest management activities in remote areas, consideration of experience requirements may be dealt with on a case-by-case basis.

*** NOTE - The *Departmental Standard – Competency requirements for licensed technicians undertaking pest management activities with pesticides and fumigants* will be updated in the near future.** If you apply for the authorisations for high-risk or sensitive place **after** the updated Standard has commenced, you will need the new competencies at the time of the application.

For PMTs that have already applied for the high-risk or sensitive place activity, different rules apply depending on your specific circumstances.

- If you held a PMT licence with the activity for high-risk and/or sensitive places **prior to 1 August 2022**, you will not be required to complete the training prescribed under the Standard. This is because you have had the authority ‘grandfathered’ and will not need to obtain the new competencies unless you let your PMT licence lapse and seek to renew it at a later date.
- If you held a PMT licence with the activity for high-risk and/or sensitive places obtained **after 1 August 2022** and do not hold the new competencies, the authorisation will continue for one (1) year after the updated standard commences. However, after this time you will be expected to have the new competencies to continue to be licensed for these activities.
- If you have not yet obtained the activity for high-risk or sensitive places and wish to continue to do so **after November 2023**, then you should apply for the endorsements before the Standard commences, to allow for continuity of business operations. Please follow the instructions for Option 2 in the table above. You will need to complete the new competencies prior to the 12-month anniversary of the new standard commencing.

Additional supporting information and documents are available at the Queensland Health Pest Management webpage found at <https://www.health.qld.gov.au/system-governance/licences/medicines-poisons/pest-management>, including factsheets, departmental standards, guidelines and application forms.

Queries about authorisations for pest management activities can be directed to the Environmental Hazards Unit by email to DOH.PMT@health.qld.gov.au