



the industry's choice for
training & accrediting users of
pesticides and veterinary medicines

ChemCert Australia

Submission to

**THE HOUSE OF REPRESENTATIVES
STANDING COMMITTEE ON
AGRICULTURE, FISHERIES AND FORESTRY**

**INQUIRY INTO
RURAL SKILLS TRAINING AND RESEARCH**

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Introduction

Training in the safe use of agvet chemicals is arguably the most important skill development program for primary producers. Any breaches in the safe use of chemicals do not just potentially damage the operator involved, but have the potential to impact widely across industries. Spray drift and residue violations pose threats to produce safety, consumer health and confidence in Australian primary products and ultimately export markets.

Australian primary producers need to be served by a training regime that is nationally applicable and which can ensure the same standards in chemical application skills are in place across all industries and regions. Currently, there are a number of impediments to achieving this goal. These include:

- Inconsistencies in State regulations
 - Some States have mandatory training requirements; others do not
 - There are different standards for the skill level required in those States that mandate training.
- A National Training Framework which allows for widely differing skill levels depending on the simulated workplace assessment situation used
- A system of competency based assessment which does not readily accommodate the technical information and understanding needed to effectively manage spray drift in broad acre situations
- Lack of Government support for the principle of reaccreditation every 5 years meaning many farmers are not kept up to date with legislative and technological developments
- Lack of Government financial support for training signaling that Government does not consider this to be a priority area.
- Lack of Government support for training for primary producers from Non-English Speaking Backgrounds (NESB) or for participants with low language and literacy levels.

These impediments must be addressed against a background of the financial hardship resulting from the drought impacting on farmers' ability to pay the full cost of training. At the same time, the introduction of new training and assessment standards under the National Training Framework's Training Packages for the rural sector have considerably raised the average training standards for users of agvet chemicals.

ChemCert Australia

ChemCert Australia is a national, non-profit organization established by the National Farmers' Federation over a decade ago, to develop the resources and standards for training farmers and related workers in the safe use of agricultural and veterinary chemicals. *ChemCert's* establishment was a response to the need for industry leadership in the area of training in the use of farm chemicals and it is the only national program for chemical use training.



Since its inception *ChemCert* has issued over 200,000 accreditations and currently issues around 20,000 accreditations annually. *ChemCert* Accreditation is valid for 5 years, after which participants undergo further training and assessment before being accredited for a further period. *ChemCert* training is incorporated in a number of major Quality Assurance programs (eg Graincare, Freshcare etc) and the Woolworths Quality Management System for fresh produce.

ChemCert is funded principally by a royalty on each course delivered. It does not receive Government funding support. Current Board members are:

- The National Farmers' Federation
- The Rural Training Council of Australia
- The Australian Pesticides and Veterinary Medicines Authority (APVMA)
- Avcare (the peak industry association for agricultural and veterinary chemical companies)
- A representative from each of the 7 State *ChemCert* Management Committees.

ChemCert training and assessment is delivered by a network of around 200 trainers who are accredited by *ChemCert*. All *ChemCert* accredited trainers are affiliated with a Registered Training Organisation (RTO) so that the training and assessment is fully compliant with the Australian Quality Training Framework. Participants are assessed against the following units of Competency which are common to three Training Packages, Rural Production, Amenity Horticulture and Conservation and Land Management:

- RTC1701A: Follow Basic Chemical Safety Rules
- RTC2706A: Apply Chemicals under Supervision
- RTC3704A: Prepare and Apply Chemicals
- RTC3705A: Transport, Handle and Store Chemicals

***ChemCert* and The National Training Framework**

ChemCert is generally supportive of the standards set for chemical use training under the Training Packages relevant to agvet chemical users. There are however a number of shortcomings in the design of the National Training Framework which do not encourage uniform and consistent national standards.

The One Size fits All Approach

The National Training Framework does not provide for degrees of competency and is therefore a system that only recognizes the 'lowest common denominator'. There is a significant difference in the levels of knowledge and skill needed to safely apply chemicals in different production situations. It is far more difficult to calibrate and use complex broadacre and orchard spray equipment than the small scale backpack equipment used in conservation and land management situations. None the less, regardless of the equipment on which they were assessed, all operators deemed 'competent' receive the same qualification under the AQTF and it remains incumbent on the employer to ascertain whether the training is relevant to the specific job requirements. This raises the potential risk of inadequately trained operators applying chemicals in high risk situations.



The National Training Framework needs to be amended to deal with technical knowledge requirements and to provide recognition for attaining technical expertise.

Quality Assurance of Training Outcomes

The introduction of the new competency standards for chemical use across all the Training Packages relevant to primary production has required a fundamental upgrade of the training content and assessment methodologies used by Registered Training Organisations (RTOs). While industry bodies such as *ChemCert* were consulted and contributed to development of the standards, there is little scope for industry to be involved in ongoing quality assurance.

At present, quality assurance is managed through the Australian Quality Training Framework (AQTF) which specifies the standards expected of Registered Training Organisations and the auditing process to ensure those standards are being met. The auditing process itself is performed by State registering bodies and is of necessity, quite general in nature, with the same auditors covering a range of training areas. It is not necessarily equipped to ensure compliance with the regulatory and technical aspects of agvet chemical application.

Given the importance of chemical user training in supporting the integrity of the export sector, it is questionable whether this general auditing is sufficient to ensure the transition to the new competency standards delivers nationally consistent quality outcomes.

Involvement of industry experts in assessing the quality of the training being delivered would be one way of ensuring better quality outcomes.

The Regulatory Environment

Inconsistent approaches to mandatory training requirements by States

Currently there is an inconsistent approach to mandating agvet chemical use training across States. Current approaches range from no mandated training (eg WA), to linking training to access to certain chemicals (eg Victoria, SA), to mandatory training for all agvet chemical users (NSW). Further complicating this disparate approach to training are industry driven Quality Assurance programs which specify a level of training as a minimum requirement for continued accreditation.

Mandatory training requirements are a valuable instrument for improving chemical use practices. Ideally, they should be serving as a leading vehicle for continuous improvement in the safe and effective use of agvet chemicals nationally. Rather than acting as this driver, they currently result in confusion and additional cost to those seeking interstate recognition. In some cases they are sending a strong signal that lower standards than those set by industry are acceptable.

States are not necessarily adopting the standards set by the National Training Framework when training is mandated. For example, in NSW, the Chemical Training User Regulation



has, for reasons related to language and literacy, set the base standard at AQF Level 2. In Victoria, the standard of training specified for obtaining an Agricultural Chemical User's Permit (ACUP) is a mixture of a Level 3 and Level 2 Unit thereby establishing a hybrid qualification which is likely to become the standard in Victoria because it has regulatory backing. While this issue is before the Product Safety and Integrity Committee of the relevant Ministerial Council, there appears to be a lack of will among State regulators to achieve national consistency.

Government needs to restore a leadership role in supporting industry's push for Level 3 training for all agvet chemical users in Australia and ensuring any regulatory approaches are standardized and consistent with the National Training Framework.

Government Support

The uptake of chemical use training was severely impacted by the withdrawal of eligibility for FarmBis funding in 2000-2001. With the removal of this eligibility, *ChemCert's* training numbers plummeted by between 30-40 per cent across States. The cost of a *ChemCert* course went from \$50 to an average of around \$300 across Australia in the space of a few years. This came at a time of reduced farm incomes due to the drought and was coupled with the introduction of the new competency standards.

The withdrawal of FarmBis funding for *ChemCert* accreditation courses has sent a negative signal to the farming community about the importance the Government attaches to chemical management training. Despite the best intentions of farmers to maintain high safety standards in the use of chemicals, there is no doubt that incentives (such as funding for courses or mandated training qualifications for the purchase or use of chemicals), can provide a substantial impetus to the maintenance and upgrading of qualifications in this area.

Reinstatement of eligibility of agvet chemical use training for FarmBis funding would provide a valuable incentive for the further uptake of training.

Language and Literacy Issues

Reaching farm chemical users from Non English Speaking Backgrounds (NESB) or those who have low levels of literacy and numeracy is particularly resource intensive and will not be adequately covered without considerably more investment in the development of training materials and in supporting greater emphasis on workplace assessment and demonstration for these groups.

Providing training for chemical users from NESBs is particularly important given their high level of involvement in production of market garden crops eg in the Sydney Basin. The importance of label reading skills cannot be overemphasized.

Currently the Government's WELL Program (Workplace English Language and Literacy Programme) administered by the Department of Education, Science and Training is not meeting the needs of the rural sector. While WELL funds have been accessed to develop



bilingual resources for delivery of *ChemCert* training, eligibility for funding under the training component of the program is difficult to achieve. This is because the Program's criteria are directed to assisting NESB participants who are employees, eg as is the norm in the manufacturing and service sectors. In the market garden sector, most participants are from family-owned enterprises. As independent operators they do not easily fit the WELL Programme's criteria for assistance.

The WELL Programme guidelines need to be revised in consultation with industry to ensure they are equally applicable to the structure of the rural sector.

Conclusions and Recommendations

The future of Australian agriculture requires maintenance of consumer confidence, both domestic and overseas, in the safety and integrity of its produce. Training in the safe application of agvet chemicals is key to achieving that goal. It depends on a system that can deliver nationally consistent standards of training in a way that is endorsed by and accessible to primary producers. To this end *ChemCert* recommends the Committee seek the following outcomes:

- The National Training Framework to be improved to provide greater scope to deal with technical knowledge requirements and to provide recognition for attaining technical expertise.
- Industry experts to be involved in assessing the quality of agvet chemical user training being delivered
- The WELL Programme guidelines to be revised in consultation with industry to ensure they are applicable to the structure of the rural sector.
- Reinstatement of eligibility of agvet chemical user training for FarmBis funding.
- Government to re-adopt a leadership role in supporting industry's push for Level 3 training and 5 yearly reaccreditation for all agvet chemical users in Australia and in ensuring any regulatory approaches are standardized and consistent with the National Training Framework.