



Managing public health risks associated with pesticides in Western Australia

WALGA Submission to Department of Health

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Contents

1. Introduction	4
2. Background.....	4
3. Local Government Response.....	5
4. Conclusion.....	16
5. Appendix: Engagement Methods	17

1. Introduction

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based organisation representing and supporting the work and interests of Local Governments in Western Australia.

It provides an essential voice for its members who are 138 Local Governments, 1,215 Elected Members and approximately 22,000 Local Government employees as well as over 2.2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve. WALGA is appreciative of the extensive consultation with Local Government that the Department of Health has undertaken in the review of legislation and regulations.

2. Background

The Department of Health released the “Managing Public Health Risks Associated with Pesticides in WA” discussion paper for public comment. The discussion paper outlines three options for consideration for Western Australia. These options include:

- **Option A:** Repeal the existing regulations without replacement. Without action, the existing Regulations would be repealed without replacement and individual Local Government authorities would become responsible for determining pesticide chemical application safety within their jurisdiction. Local Government would have the potential to draft and publish local laws to regulate the use of pesticides with their jurisdiction boundary;
- **Option B:** Retention of the existing regulatory regime by making new regulations under the *Public Health Act 2016* identical to those in force under the *Health (Miscellaneous Provisions) Act 1911*;
- **Option C:** Develop new, updated regulations to manage public health risks. This option considers regulations that would uphold the current regulatory requirements and includes **nine proposals** to enable a modern regulatory structure. Proposal 3 and Proposal 7 within Option C have the most impact on Local Government.

Local Government is an enforcement agency under the *Public Health Act 2016* (the Public Health Act), with Local Government Environmental Health Officers (EHOs) playing a key role in administering the Public Health Act and Regulations. To ensure broad representation of Local Government responses to the Discussion Paper, and within this submission, WALGA promoted the Discussion Paper consultation through our communication channels to Local Governments, as well as via direct emails and phone calls to various Local Governments and Local Government networks of officers working in environmental health.

WALGA received 29 responses from Local Governments as well as a formal submission from the Metropolitan Environmental Health Management Group (MEHMG), which is supported by the majority of MEHMG members. Additionally, WALGA officers responsible for the areas of Community and Environment policy have provided comment on the submission. A list of engagement methods and the Local Governments engaged is included in Appendix 1.

3. Local Government Response

WALGA received 29 responses supporting both Option B and Option C. The majority of individual responses received were from regional Local Governments, while the collective submission from MEHMG represents approximately 30 Local Governments in the Perth Metropolitan area. A summary of the preference for Option B and Option C is shown in the table below:

Option B - retain the existing regulatory regime by making new regulations under the <i>Public Health Act 2016</i> identical to those in force under the <i>Health (Miscellaneous Provisions) Act 1911</i>	Option C - Develop new, updated regulations to manage public health risks under the <i>Public Health Act 2016</i>.
<ol style="list-style-type: none"> 1. Shire of Bruce Rock 2. Shire of Capel 3. Town of Claremont 4. Shire of Cue 5. Shire of Laverton 6. Shire of Leonora 7. Shire of Meekatharra 8. Shire of Menzies 9. Shire of Mount Magnet 10. Shire of Northampton 11. Shire of Quairading 12. Shire of Yalgoo 	<ol style="list-style-type: none"> 1. Metropolitan Environmental Health Management Group (MEHMG) 2. City of Belmont 3. Shire of Broome 4. Shire of Bridgetown-Greenbushes 5. Shire of Chapman Valley 6. Shire of Cuballing 7. Shire of Denmark 8. Shire of Derby West Kimberley 9. Shire of Halls Creek 10. Shire of Mingenew 11. Shire of Merredin 12. Shire of Murray 13. Shire of Perenjori 14. City of Stirling 15. Shire of Wyndham East Kimberley 16. City of Vincent 17. Shire of Yilgarn

The majority of Local Governments plus MEHMG provided in-principle support for Option C. The Local Governments that favour Option C are strongly opposed to two of the nine proposals within this option.

Local Government do not support the following:

- Option C, Proposal 3: to remove the current exemption from licensing for State and Local Government employees, meaning all employees involved in pest management will require an individual licence, and
- Option C, Proposal 7: that Local Government replaces the Department of Health (DOH) as the enforcement agency, which is a transfer of responsibilities.

The following summarises the feedback received from Local Governments on the 25 questions in the discussion paper, including responses received for Option B and Option C.

Option A

Question 1: Do you support the adoption of Option A: Repeal existing regulations without replacement?

Question 2: Can you identify any further advantages or disadvantages of Option A?

Local Governments do not support Option A.

Option A is inconsistent with other counterpart Australian State legislation and regulations as well as creating a number of issues as identified in the discussion paper including:

- No clear, uniform requirement amongst pesticide management technicians creating confusion
- Lack of consistency in the approach creating higher risk to public health, particularly if some pesticide management technicians cut corners
- Difficulties to respond to risks and enforcement of issues could happen in different ways, and
- Difficulties managing consumer complaints due to there not being a single, clear approach.

Option B

Question 3: Do you support the adoption of Option B: Retention of the existing regulatory regime by making new regulations under the Public Health Act 2016 identical to those in force under the Health (Miscellaneous Provisions) Act 1911?

Question 4: Can you identify any further advantages or disadvantages of Option B?

There are 12 Local Governments that support Option B.

Local Governments that support Option B stated the following reasons:

- It will retain the current oversight and leadership (i.e. fees, registration, enforcement, and training) by the State Government which ensures consistency across the State and will not pass this onto Local Governments who do not have the capacity and resources to carry out functions as proposed Option C by proposal 7
- Currently the regulations seem to be working well and there has been no significant requests from the pesticides industry to change this, with the number of major incidents in Western Australia over the past years being limited, and
- Even though the current regulatory environment may be viewed as prescriptive, it is necessary and not an issue when it's effective. It is clear within the current prescriptive environment what is required and there is a view that a risk based criteria could lead to a lack of consistency across the State and weakening of the existing controls for

pesticide management. Risk based criteria may also give more authority to the pesticides industry where they can take advantage of the system and there may be difficulties enforcing this.

Option C

Question 5: Do you support the adoption of Option C: Provide new, updated regulations under the Public Health Act 2016?

Question 6: Can you identify any further advantages or disadvantages of Option C?

There are 16 Local Governments that support Option C, plus MEHMG.

Local Governments that support Option C stated the following reasons:

- Introduction of new, updated regulations will reflect the new expectations and requirements of the Public Health Act which is based on a risk based framework. It is recognised that the approach should be precautionary and balanced which provides the necessary regulatory environment but also allowing for some flexibility, and
- The proposal will allow for the establishment of infringement notices for minor offences or non-compliance issues which is currently not included under the existing regulatory environment. As the discussion paper states “the current system allows for penalties only after a public health incident has occurred. Penalties can be imposed only after a successful prosecution. The prosecution process can be long, complex and take years to complete.”

Proposal 1 - Continue Registration under the Public Health Act

Question 7: Do you support the listed recommendations to maintain registration requirements for pest management businesses?

Question 8: Do you believe that there are any recommendations for registration not listed that should be included?

Local Governments support Proposal 1.

Local Governments support the requirements for pest management businesses to maintain registration. Local Governments support the following from the discussion paper:

- A requirement for the identification of the pest management business on all vehicles used by the business. This allows members of the public to identify specific businesses where they may have cause for complaint
- A requirement for registrants to keep a record of details of all technicians employed by the business for a minimum of 3 years. This will assist enforcement agencies to track

the activities of pesticide management technicians following complaints or issues of pesticide exposure

- Registrants will be required to keep a record of all pest management treatments undertaken. This will assist enforcement agencies to track the activities of pesticide management technicians following complaints or issues of pesticide exposure.

Local Governments have commented that the registration of pesticide businesses is necessary to maintain appropriate standards to ensure that health risk is reduced to the public, as well as important for assessing, inspecting and investigating businesses and any complaints received from the public.

Proposal 2 - Continue Licensing under the Public Health Act

Question 9: Do you support the listed recommendations to maintain licensing requirements for individuals undertaking pest management treatments unless they meet the criteria to qualify for an exemption from licensing?

Question 10: Do you believe that there are other recommendations that should be included for licensing?

Local Governments support Proposal 2.

Local Governments support the continuation of licensing requirements for individuals undertaking pest management treatments unless they meet the criteria to qualify for an exemption from licensing.

This includes the following:

- Pesticide management technicians (PMTs) and pesticide management sales technicians will be required to hold a valid licence in order to undertake their activities
- When an applicant does not meet the criteria of qualifications or experience for a full PMT licence, a provisional PMT licence will be required with appropriate supervision under a full PMT licence
- The Chief Health Officer will determine the definition of 'adequately qualified' for the purpose of each licence endorsement area
- Restricted-use pesticides will be listed on licences, and
- Any conditions imposed on the licensee will be listed on the licence.

Licensing is required to ensure clear standards are followed and maintained and that individuals have the necessary skills and knowledge for handling pesticides. The ability for the enforcement authority to withdraw or suspend a licence if there are issues with the pest management technician should be considered.

Proposal 3 - Licensing Exemption Criteria for Primary Production Sites in Remote Locations

Question 11: Do you support the proposal to expand the criteria for exemption from licensing on primary production sites in remote locations to include all forms of pesticide applications?

Question 12: Can you identify any situations where expanding the exemption criteria from licensing for individuals on primary production sites could lead to a high risk scenario?

There is no clear position for Proposal 3 for the expansion of criteria for exemption from licensing on primary production sites in remote locations to include all forms of pesticide applications.

WALGA received comments from Local Governments equally supporting and opposing this proposal. Further consultation is required to determine whether the majority of Local Governments support this proposal.

Local Governments supporting this proposal provided the following comments:

- The proposal appears to be a practical approach for remote primary production sites and where the general risk to the public is minimal. Pesticides are not cheap and primary producers are not going to apply pesticides at a higher rate than needed or when it is not required. It would also mainly apply to private property so the risk to the general public is low. It may be possible to still build in a safety net even with providing an exemption. For example if it is stated that a specific activity is exempt from licensing provided certain guidelines (i.e. Pesticide Guidelines developed by DOH) are adhered to would provide some safety net despite an exemption applying. If there was an offence specified for failing to comply with the guidelines this would still create an enforcement option whilst still removing the administrative and licence burden for remote primary producers.
- The proposal to expand the criteria for exemption from licensing on primary production sites in remote locations to include all forms of pesticide application is supported except for Schedule 7 poisons and fumigants. The current requirements for registration with the Department of Agriculture for the purchasing/acquiring and laying of fox baits, and contact details recorded at the pesticide stockists premises at point of sale for rabbit control should be maintained. There should also be a minimum standard of training for these exempted individuals so that they are aware of proper safety requirements for the handling of the chemical and appropriate PPE. Being remote, there is a possibility of farmers starting up a pesticide business and carrying out work on other people's property, not just their own. Local Governments are unlikely to know about this unless there is a complaint.

Local Governments opposing this proposal provided the following comments:

- The current process has not resulted in any issues that Local Governments are aware about and therefore they don't understand the requirement to introduce this proposal.

More explanation is required regarding this proposal, particularly the reasoning and evidence behind it as well as the remote areas this covers.

Proposal 3 - Licensing Exemption Criteria for State and Local Government Employees

Question 13: Do you support the proposal to remove the current exemption from licensing for State and Local Government employees? Do you have further comments on the local and State government employee licensing exemption?

In the discussion paper Proposal 3 discussed:

“Although local government authorities are not registered proprietors and as organisations do not charge for pesticide services, there is a strong case to remove the current exemption from licensing for local government employees because they undertake pest management treatments in public places. The preferred option of the DOH is to license all operators of local and State government whether employed directly or indirectly as contractors. There is no intent to register local government authorities regardless of whether they receive payment for pesticide services on private land or not.”

In principle, Local Governments oppose Proposal 3; the removal of the current exemption from licensing for State and Local Government employees.

The discussion paper does not outline the rationale for the “strong case” for removing the current exemption from licensing for State and Local Government employees. There is no evidence in the discussion paper that supports the argument that licensing of Local Government employees would act to reduce the risk to public health associated with pesticide use in Western Australia.

Local Governments undertake significant duty of care to their communities during the use of pesticides. Local Government undertake risk assessments for work tasks, follow standard operating procedures that either eliminate or reduce risks, and use pesticides in accordance with the products material safety data sheet and Part 6 of the current regulations.

The current regulations ensure that Local Governments have employees able to use pesticides in compliance with occupational health and safety principles that allows a high degree of responsiveness in applying pesticides as the situation requires. For example, early treatment and follow-up applications of herbicide as required by a Local Government can ensure that weed control is undertaken in a more efficient and effective manner. This can increase the success of weed control and also minimise the quantity of herbicide applied. In contrast, it can be inefficient to engage a licensed contractor for small-scale, ongoing works of this nature.

Local Governments oppose this proposal for the following reasons:

a) Costs & resources

Local Governments are concerned that removing the exemption may lead to the requirement for Local Governments to undertake additional training requirements. DOH’s ‘Guide to

Obtaining a Pest Management Technicians Licence' provides an overview of all the approved courses covering nine different endorsement areas, which may be a requirement for Local Governments. This may place additional financial and resource burden on Local Governments in an environment where they are currently already under increased pressure to deliver a significant amount of other services to their local communities with limited resources. Many Local Governments depend on Federal and State Government grant funding to deliver services to their communities and with additional expectations for service delivery this contributes to Local Governments increasing rates to cover this. Local Governments strongly oppose this proposal unless the State Government can provide funding in their State Budget to fund activities under the Public Health Act. This is supported by WALGA's position for more support and funding to Local Governments to deliver initiatives under the Public Health Act detailed in [WALGA's Public Health Advocacy Plan 2019/20](#).

b) Conflict of interest

The discussion paper has not discussed how to address the conflict of interest for Local Governments where they are proposed to be both the enforcement agency (as per Proposal 7) and the licensed pesticide service provider (i.e. through Parks and Environment sections).

If the DOH were to consider funding or subsidising any new licensing requirements for Local Governments and also address the conflict of interest issue, then the sector would be willing to consider this proposal further. WALGA would recommend further consultation with Local Governments regarding this should the DOH proceed with Option C.

Proposal 4 - The Control of the Use of Pesticides in Public Places

Question 14: Do you believe that the recommendations for minimum standard signage indicating pesticide use in public places should be prescribed?

In the discussion paper:

- *It is proposed that signage will be required to meet a minimum lettering dimension with all exceptions to be approved by Chief Health Officer permit. It is proposed that signage be displayed in prominent locations that can be readily seen by members of the public.*
- *Vehicles will be required to display flashing yellow warning lights during spraying in public places.*

Local Governments oppose Proposal 4, based on the following comments received from MEHMG, collectively responding on behalf of 30 Local Governments.

MEHMG have determined there should not be a "one size fits all" approach and rather flexibility is required for different situations. MEHMG would like a set of guidelines for signage which should address a number of inconsistencies with current signage including the following:

- There is inconsistency between the signage requirements for undertaking verge spraying from a moving vehicle and undertaken park spraying from a moving vehicle with the latter requiring additional signage which also must remain in place until the pesticide has dried despite it being possible that the same chemical (and hence the same risk to the public) is being applied in both situations.

- Whilst extra signage in addition to the signage on the moving vehicle undertaking park spraying is generally supported this should be considered to be more “best practice” than a stipulated requirement. It is noted that the current wording now requires additional signage so that it is clearly visible to persons approaching. As a park has multiple points of access this would require a number of additional signs to be placed out as potentially someone could approach from any direction.
- The requirement for extra signage in addition to the signage on the vehicle when undertaking verge or park spraying from a stationary vehicle would also appear to be unnecessary and over the top. In these cases treatment is usually undertaken using a small hose connected to a storage tank on the vehicle and in close proximity to the vehicle so the sign on the vehicle should be sufficient. It is also noted again that the sign is required to remain in place until the surface has dried so if the vehicle travelled to a garden bed, did a spot treatment and then moved on to another garden bed to do another spot treatment etc. multiple signs would be required at each garden bed. Rather than a stipulated requirement it is believed the requirement for additional signs in these situations should be at the discretion of the operator particularly given that in most cases these areas will most likely be on Local Government land and therefore subject to any additional controls considered relevant.
- In the case of mosquito treatment a liquid larvicide may be applied to standing pools of water to prevent mosquito breeding. Pooled water will not ‘dry out’. Regulations can be modified easily to account for such a situation.
- In relation to the actual signage it is noted that the wording of the sign is required to be "Caution (Name of Chemical) being applied. Avoid contact with area when sign is displayed". Whilst this may be useful for common types of pesticides which people may be familiar with and have used themselves, such as glyphosate, it becomes meaningless where they are not familiar with the product in question. It is doubtful that a sign stating 'Caution *Bacillus thuringiensis israelensis* being applied. Avoid contact with the area when the sign is displayed' will provide any practical assistance to the public as they are unlikely to know what the product is, what its risk is and what it has been applied to. A preferred sign option as an alternative would be 'Caution Mosquito Larvicide being applied. For more information please contact your Local Authority'. However despite this alternative providing better information and a point of contact would not be acceptable under the current Regulations.
- The requirement for signage on vehicles generally makes sense and is supported however consideration needs to be given for unique situations. For example one member Local Government currently operates a quad bike with a spray applicator for mosquito control which due to its small size makes it almost impossible to place a warning sign of the required size without compromising the operational effectiveness of the ATV or becoming a safety risk to the rider.
- The current signage requirements fail to apply proper risk management principles. That is no consideration has been given to actual chemical toxicity of the pesticide being applied, operating practices or pesticide management plans. For example the application of glyphosate to a verge from a moving vehicle does not require signage until the surface has dried however the application of a biological agent (in the case of BTi) or a low toxicity growth regulator (in the case of S-Methoprene) via spot treatment would.

Proposal 5 - Provide Controls for Safe Fumigations Under the Public Health Act

Question 15: Do you consider that any of the recommendations for prescription regarding fumigations should be excluded from regulation?

Question 16: Do you believe that there are any recommendations not included for fumigations that should be prescribed?

Local Governments support Proposal 5.

Local Governments do not consider any of the recommendations for the prescription for safe fumigations should be excluded from the regulations. Local Governments support the recommendations including the following:

- The Chief Health Officer to have powers to approve the site of fumigations and issue conditions based on that approval
- The Chief Health Officer to have powers to specify that all individuals undertaking a fumigation are responsible for ensuring the area of a fumigation is secure, determining who must be present, who can be present and who cannot be present during fumigations. This includes measures such as erecting warning signs and securing access paths to the area. Restrictions applying to who can access and have entry to the area which should also align with OSH requirements
- The Chief Health Officer to have powers to specify to all individuals undertaking a fumigation that they must carry out a risk assessment, fumigation plan and emergency management plan prior to performing fumigations and to minimise the identified risks which should also align with OSH requirements
- The Chief Health Officer to have powers to specify to all individuals undertaking a fumigation that they must clean up after fumigation including removing warning signage, and
- The Chief Health Officer must be satisfied that concentrations of fumigant in the fumigation area and any residual fumigant including in the commodity being treated must be managed in order to protect public health.

Proposal 6 - Provide Controls for Management of Registered Pesticides

Question 17: Do you consider that any of the recommendations for prescription regarding registered pesticides should be excluded from regulation?

Question 18: Do you believe that there are any recommendations not included for registered pesticides that should be prescribed?

Local Government support Proposal 6.

Local Government do not consider any of the recommendations regarding providing controls for the management of registered pesticides under the *Public Health Act 2016* should be excluded from regulations. Local Governments support registered pesticides being managed

across the following areas: storage, use, transport, decontamination and disposal. Unregistered pesticides should only be used with Chief Health Officer authorisation.

Proposal 7 - Local Government Replacing DOH as the Enforcement Agency

Question 19: Do you support the proposal that Local Government replaces Department of Health as the enforcement agency?

Question 20: Do you agree or disagree with any of the listed advantages and disadvantages for Local Government authorities as enforcement agency?

Question 21: Do you have any suggestions about how Proposal 7 (Local Government authorities as enforcement agency) could be implemented?

In the discussion paper, Proposal 7 discussed:

“Proposal 7 has been recommended to address the logistical considerations of regulating local services from a centralised agency. The DOH is located in the metropolitan area and has minimal exposure to regional and remote sites across the state. Local Government by contrast has authorised officers located throughout the state and is better placed to regulate and monitor activities of pesticide operators in their jurisdictions.”

Local Governments strongly oppose Proposal 7.

Local Governments support the DOH continuing to be the single, central agency to oversee the registration and licensing for pesticide management for the following reasons:

- Local Governments do not have the knowledge, resources and skills to replace the DOH as the enforcement agency. This will place further financial burden onto Local Governments as they are expected to deliver increased services to their communities. Under this proposal Local Governments would be able to collect fees from the registration of pesticide businesses however this is not expected to recover the costs associated from developing the skills for and delivering enforcement activities. As the discussion paper states that costs to businesses should be kept minimal to ensure businesses are able to apply for registration which means the cost recovery will be minimal. Local Governments strongly oppose this proposal unless the State Government can provide funding in their State Budget to fund activities under the Public Health Act. This is supported by WALGA’s position for more support and funding to Local Governments to deliver initiatives under the Public Health Act detailed in [WALGA’s Public Health Advocacy Plan 2019/20](#)
- With the DOH continuing as the central agency, there will be less discrepancies with approval processes and fees which could potentially occur amongst different Local Governments
- As outlined in the discussion paper, all other State Health Departments in Australia are the enforcement agencies. DOH should therefore continue to be the enforcement agency

- It is likely to be problematic for Local Governments to manage pesticide businesses being used cross-boundaries, as well as if these pesticides businesses register in one Local Government but then operate in another Local Government
- Local Governments are responsible for the applications of pesticides in public areas, which means there will be a conflict of interest for Local Governments being the pesticide provider and the enforcer. The discussion paper acknowledges this, but doesn't explain how this may be addressed, and
- The discussion paper suggests that the issue is with the difficulties DOH have with being the enforcement agency in regional and remote areas across the State. However the discussion paper also mentions that at times "in regional areas this service is undertaken by Local Government on behalf of the DOH." This arrangement can still continue without needing to impose all enforcement agency duties to all Local Governments.

Proposal 8 - Variable Frequency of Renewal for Registrations and Licences

Question 22: Do you support the proposal that registration and licence validity be amended to include a 3-year option?

Local Governments do not support Proposal 8.

Whilst the proposal for registration and licence validity from 12 months to three years is supported by the pesticide industry, Local Governments are not supportive. In the discussion paper, the DOH has stated that there will be less administrative burden from processing registrations and licences every three years. However, Local Governments believe this will lead to a lack of compliance and out of date records from pesticide management technicians. This is further supported by the discussion paper acknowledgement that formal information exchange between DOH and regulated individuals will become less frequent.

Proposal 9 - Introduce Substance Management Plan Requirements

Question 23: Do you support the proposal to include a substance management plan in the requirements for registered proprietors and any individuals exempt from licensing that use restricted chemicals?

Local Governments support Proposal 9.

The majority of Local Governments support the proposal to include a substance management plan in the requirements for registered proprietors and any individuals exempt from licensing that use restricted chemicals.

The introduction of substance management plans may provide additional protection for public safety but should not create additional administrative burdens on the enforcement agency. The substance management plans should consider different scenarios where pesticides would

be applied and include the risks associated. Another consideration is to use the DWER Model for registered landfill versus licensed landfill where a guideline document outlining the appropriate controls for a person/company is used.

Question 24: Do you have any suggestions for alternative options that have not been considered?

Question 25: Do you have any other comments to make on how public health risks associated with pesticides are managed in Western Australia?

No comments received from Local Governments.

4. Conclusion

Thank you again for the opportunity to make comment on the “Managing Public Health Risks Associated with Pesticides in WA” Discussion Paper. Local Governments are appreciative of the opportunity to provide input on the development of the *Public Health Act 2016* regulations, and it is anticipated that integrating the experiences and knowledge of Local Government Environmental Health Officers into regulation will lead to improved health and wellbeing for community.

From WALGA’s consultation Option C was favoured more than Option B. WALGA understands that the DOH’s preferred option is Option C to develop new, updated regulations to manage public health risks. Local Governments strongly oppose:

- Proposal 3 to remove the current exemption from licensing for State and Local Government employees, and
- Proposal 7 that Local Government replaces DOH as the enforcement agency.

WALGA seeks to continue discussions with DOH regarding Proposal 3 and Proposal 7 for Option C, if this is the preferred option selected after consultation and requests that further consultation with Local Governments is necessary.

5. Appendix: Engagement Methods

Engagement Process

Newsletters:

- WALGA Local Government News
- WALGA Community and Place News

Emails:

- MEHMG
- LG Environmental Health Officers Mailing List
- Regional Networks Environmental Health Officers
- WALGA Teams: Governance, Environment
- LGIS – Local Government Insurance Services

Formal correspondence:

- Infopage sent out to all Local Governments
- Letter sent to all CEO's

Submission sent to WALGA People and Place Policy Team

Local Governments Engaged

Written submissions received from:

- Metropolitan Environmental Health Management Group (MEHMG)
- Shire of Bruce Rock
- Town of Claremont
- Shire of Cue
- Shire of Meekatharra
- Shire of Mount Magnet
- Shire of Murray
- Shire of Yalgoo
- Shire of Northhampton
- City of Stirling
- Shire of Yilgarn

Comments received from:

- City of Belmont
- Shire of Bridgetown-Greenbushes
- Shire of Broome
- Shire of Capel
- Shire of Chapman Valley
- Shire of Cuballing
- Shire of Denmark
- Shire of Derby West Kimberley
- Shire of Halls Creek
- Shire of Laverton
- Shire of Leonora
- Shire of Merredin
- Shire of Menzies
- Shire of Mingenew
- Shire of Perenjori
- City of Vincent
- Shire of Wyndham-East Kimberley