



Submission to the Queensland Productivity Commission

RE: Building Regulation Reforms (Tranche 2) – Occupational Licensing Requirements for Pest Controllers

Submitted by: Australian Environmental Pest Managers Association (AEPMA)

5th June 2025

Thank you for the opportunity to provide input to the Commission’s review of Building Regulation Reforms under Tranche 2. On behalf of the Australian Environmental Pest Managers Association (AEPMA), this submission addresses one specific issue: the requirement for occupational licensing through the QBCC for pest controllers not involved in pre-construction termite management.

AEPMA represents professional pest managers across Australia. We set and promote industry standards, support safe and ethical practice, and work closely with regulators. We also manage PestCert—Australia’s main industry accreditation program—designed to lift the bar for professionalism and consumer confidence.

Summary of Our Position

The current licensing rules require all pest controllers in Queensland to hold a QBCC occupational licence—even if their work has nothing to do with building or construction. Pest controllers already operate under Queensland Health via the Pest Management Act 2001, and the addition of QBCC licensing for non-construction work is unnecessary.

This dual system does not exist in other states. It adds cost, causes confusion, and creates a barrier for those wanting to work in Queensland.

We believe pest controllers not carrying out pre-construction termite work should be removed from the QBCC licensing framework. Regulation should remain solely under Queensland Health.

Pest controllers in Queensland who don’t do termite work for new buildings still have to pay around \$500 a year for a QBCC occupational licence.

These professionals are already licensed under Queensland Health, so the QBCC licence adds another layer of red tape.

No other state has this setup. In New South Wales, Victoria, and South Australia, pest managers operate under one licensing system—usually via the state health or environment department. They don't deal with a building regulator unless they're doing actual construction-related work.

This puts Queensland pest managers at a disadvantage.

Examples from Other States

- Victoria: Licensed by the Department of Health only—no QBCC-style involvement.
- NSW: Regulated by the EPA under the Pesticides Act.
- South Australia: Pest management comes under SA Health.

If pest managers in other states don't need two licences, there's no reason it should be different in Queensland—especially when the work is unrelated to the building industry.

Reforms Under Tranche 2

We have seen other trades gain exemptions under Tranche 2 where their work poses no risk to building safety—painters (under \$3,300), sign installers, and some landscapers.

The same principle applies here. General pest control doesn't affect structural integrity or building safety. There's no good reason to treat pest managers differently.

What It's Costing the Industry

This requirement particularly hurts small businesses. Many pest controllers are sole operators or run lean businesses in regional and urban areas. The \$500 licence fee is only part of the cost—there's also time, paperwork, and sometimes the need for accountants or consultants to get through the process.

Removing the QBCC licence for non-construction pest controllers would reduce the load immediately freeing up resources for training, safety, and better equipment.

Barriers for People Moving to Queensland

There's another consequence worth pointing out. If a technician moves to Queensland from another state (or New Zealand), they can't transfer their licence easily. Most states have mutual recognition arrangements—but QBCC licensing doesn't allow for that.

So pest controllers wanting to relocate to Queensland are stuck in limbo for months. On top of that, they pay not only the fees, but also for the administrative help to complete the application. This becomes a real deterrent for skilled workers at a time when Queensland needs them—particularly with more construction and increased demand for pest management in both urban and rural areas.

Local Products and Innovation

We also support stronger use of Queensland-made and Australian-manufactured pest control products and systems. Supply chain issues and delays with overseas products have caused real problems for the industry. Supporting local development could improve reliability and reduce dependency on imports.

What We're Asking For

We ask that the Queensland Government and the QBCC:

- Remove the requirement for a QBCC occupational licence for pest managers who don't do pre-construction termite work.
- Provide a formal exemption pathway under Tranche 2.
- Allow current licence holders to opt out if their work is unrelated to construction.
- Place all pest control licensing under Queensland Health, in line with other states.

Industry Impact

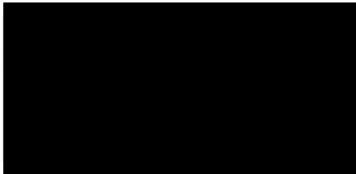
If the above steps are taken, the benefits would be immediate:

- Cost savings – \$500 a year per technician.
- Simplified compliance – one regulator, not two.
- Fairer rules – Queensland would be in line with other states.
- Better workforce mobility – easier for skilled technicians to move here.

The current licensing model puts an unfair burden on pest controllers who don't work in the building sector. It adds cost without improving public safety and makes Queensland an outlier nationally.

A more practical, streamlined approach would see all non-construction pest controllers licensed solely under Queensland Health. This is consistent with how other states operate and better reflects the nature of the work being done.

We welcome further discussion on this matter and are happy to provide more information if required.



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