Trevor Hold
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28 February 2025
Regarding: Decision to cease communication.

To Decision Makers of Department of Primary Industries,

I acknowledge receipt of your letter dated 25 February 2025, reference CTS02157/25, CTS02155/25, regarding your decision to cease communication with me.

The Department of Primary Industries (Department) has the right to make decisions on who and how they engage in communications.

This is also true for my clients and paid members of Australian Advocacy Group (AAG). I manage a lawful, registered business providing positive, cost-effective services to my members. They have nominated advocacy through AAG and choose to only engage with the National Fire Ant Eradication Program (NFAEP) through this service.

Australian Advocacy Group does not currently align or support the current eradication program, particularly prophylactic treatment and aerial treatment in heavily treed areas. This is in line with most of the community we engage with.

The clients of AAG have made a special effort to provide a signed service agreement to meet their biosecurity obligation to engage in discussions with the NFAEP. They all have a special and unique reasonable excuse required to be presented to the NFAEP on their behalf.

Generally, the clients of AAG have nominated advocacy after negative outcomes experienced by engaging with the program. These outcomes have been reported as bullying, intimidation, coercive control, threatening behavior etc. and have often left people with negative health and overall wellbeing outcomes.

Part 12 of the Biosecurity Act 2014 (QLD) requires Community involvement in administration of Act. The conduct of the NFAEP has failed to administer, in consultation with, and having regard to the views and interests of, public sector entities, local governments, industry, Aborigines and Torres Strait Islanders under Aboriginal tradition and Island custom, interested groups and persons and the community generally, including the clients represented by AAG.

In particular, my clients object to the Departments failure to act and make decisions in a way that is compatible with human rights as per section 58(1)(a) of the Human Rights Act 2019 (Qld) (HRA) and the department failing to give proper consideration to a human right that is relevant to the decision (section 58(1)(b) HRA, particular section 24, Property rights and section 25 Right to Privacy and Reputation.

I have never provided any correspondence that is abusive or threatening in any way and the volume and frequency of my complaints, resulting from my own personal circumstances and the circumstances of my clients, reflect the grievances and adverse experiences directly related to the conduct of the NFAEP. If these complaints are having an impact on resources, may I suggest that the NFAEP stop acting in a manner that is consistent with people wanting to make complaints.

I reiterate, the clients of AAG provide opportunity for the NFAEP to fulfill its responsibility of community engagement under the Biosecurity Act 2014, Chapter 1, Part 3, Section 12, which states*: 'Community involvement in administration of Act This Act is to be administered, as far as practicable, in Consultation with and having regard to the views and interests Of, public sector entities, local governments, industry, Aborigines and Torres Strait Islanders under Aboriginal tradition and Island custom, interested groups and persons and the community generally'*, by providing AAG the authority of advocacy. Without engaging with AAG, as requested by clients, the NFAEP will not only breach the biosecurity act but will be unable to meet its obligation to establish site specific information about the property including:

1. tailoring a treatment plan to meet property requirements

2. discussion and information about treatment

3. understand any issues accessing your property, such as dogs, locked gates, animals, livestock, crops, or water sources.

My clients have a reasonable excuse to obstruct the designated officer, or another person or a detection animal helping a designated officer entering the private property, as is their right, as detailed in the Biosecurity Act 2014 (Queensland), Section 336 Obstructing a designated officer, and will exercise this right. Should you wish to receive the documentation associated with the reasonable excuse or have any inquiries about private property please feel free to reach out, I will be happy to assist.

In the meantime, please place my clients on a do not treat list and instruct field teams not to enter or conduct treatment on their property. All notices provided to my clients will be certified, copied and returned with an objection notice via registered mail and by electronic mail.

It would be beneficial to obtain an NFAEP liaison manager, so resources are not wasted by me having to email everyone about these issues.

If you require additional information or have any questions, please feel free to reach out.

Kind regards



Trevor Hold

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