



Department of **Health**

Department of **Primary Industries
and Regional Development**

Department of **Biodiversity,
Conservation and Attractions**

**Code of Practice
for the Safe Use and Management
of Registered Pesticides containing
1080, PAPP and STRYCHNINE**

**For vertebrate pest management
in Western Australia**

**1080 (Sodium fluoroacetate)
PAPP (Para-aminopropiophenone)
STRYCHNINE (Strychnine alkaloid)**

April 2018

Foreword

Legislative Authority

This Code is issued in accordance with the Medicines and Poisons (Section 72) (Registered Pesticides 1080 and PAPP) Notice 2018 and Medicines and Poisons (Section 72) (Registered Pesticide Strychnine Alkaloid) Notice 2018. These Notices are issued under Section 72 of the Medicines and Poisons Act 2014.

Approval

This document is approved for publication by the Deputy Chief Health Officer as delegate of the Department of Health Chief Executive Officer for Section 72 of the Medicines and Poisons Act 2014.

Version

This document was approved with effect from 20 April 2018 and replaces the Code of Practice for the Safe Use and Management of 1080 in Western Australia (April 2012) and the Code of Practice for the Safe Use and Management of Strychnine in Western Australia (April 2013).

Review

The Department of Primary Industries and Regional Development, Department of Biodiversity, Conservation and Attractions and the Department of Health may initiate a review of, or amendment to, this Code at any time.

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Emergency or poisoning

For all emergencies or poisoning call 000 and seek medical assistance urgently.
Poisons Information Centre – call 13 11 26 (24 hours a day / 7 days a week).

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Definitions

Applicant	A landowner/occupier, Agent, Authorised Person or Authorised Officer who applies to an Authorising Officer for approval for the possession and use of 1080, PAPP and/or Strychnine products by an Approved User. Applicants must be at least 18 years of age. (See Appendix 1 for role descriptions).
Agent	A person appointed by a landowner/occupier to represent them as an Applicant.
Application	A written request, in the prescribed format, for a permit to possess and use prescribed quantities of specified products on a specified property.
Approved User	A person identified on a Permit as one who will possess and use 1080, PAPP and/or Strychnine (in the form of an APVMA registered pesticide) on a specified area of land. A suitably trained person, Approved Pastoralist, Authorised Officer or Licensed Pest Management Technician may be an Approved User. (See Appendix 1 for role descriptions).
Approved Pastoralist	A pastoralist who has been authorised by an Authorising Officer to possess, store, transport and use 1080 concentrate for the non-commercial manufacture of field-prepared baits. A pastoralist is defined as a resident of a Crown land lease granted for pastoral purposes as defined under Section 93 of the Land Administration Act 1997.
APVMA	Australian Pesticides and Veterinary Medicines Authority
Authorised Department	Department of Primary Industries and Regional Development (DPIRD) or the Department of Biodiversity, Conservation and Attractions (DBCA).
Authorising Officer	An Officer who is trained to assess Applications and issue Permits on behalf of an Authorised Department. Authorising Officers must be authorised by the DG of the respective Authorised Department. Note: An Authorising Officer will usually also be an Authorised Officer.
Authorised Officer	An officer of DPIRD or DBCA who has been authorised by the DG of the respective Authorised Department to be sold and supplied with, and possess and use 1080, PAPP and/or Strychnine.
Authorised Person	An employee, contractor or associate of an Authorised Department who has been authorised by an Authorising Officer of the respective Authorised Department to be sold and supplied with, and possess and use 1080, PAPP and/or Strychnine products.
Basic Training Course	A training course in the safe use and handling of 1080, PAPP and/or Strychnine products approved by the DG, DOH.

Canid Pest Ejectors (CPEs)	Spring activated baiting devices that use a piston to propel the liquid contents of a 1080 capsule directly into the mouth of the canid as it pulls the bait placed on the head of the ejector. Dried meat covers the lure holder that contains the capsule. The lure holder sits on top of the ejecting mechanism which is contained in a 15 – 18 cm hollow tube placed firmly in the ground.
DBCA	Department of Biodiversity, Conservation and Attractions
Director General (DG)	Equivalent to the Chief Executive Officer of DPIRD, DBCA or DOH. Note: Departmental officers may be formally delegated to carry out specific DG functions.
DOH	Department of Health
DPIRD	Department of Primary Industries and Regional Development
Incident	An event which gives rise to reasonable suspicion of a breach or suspected breach of the Section 72 Notices, or this Code.
Incident Investigation Coordinator	Officer of DPIRD or DBCA designated by the DG of the relevant department to coordinate investigations.
Licensed manufacturer/wholesaler	A business licensed under the Medicines and Poisons Act 2014 to manufacture and/or wholesale 1080, PAPP and/or Strychnine products. Some businesses will only wholesale previously manufactured products.
Licensed Pest Management Technician (LPMT)	A pest management technician licensed under the Health (Pesticides) Regulations 2011, whose licence is endorsed to possess and use 1080, PAPP and/or Strychnine products.
Licensed retailer	An entity licensed under the Medicines and Poisons Act 2014 to sell or supply 1080, PAPP and/or Strychnine products by retail sale.
Nominated retailer	The licensed retailer nominated by the Applicant to supply 1080, PAPP and/or Strychnine products in accordance with a Permit
PAPP	Para-amino propiophenone. Also known as 4-amino propiophenone.
PAPP Product	A manufactured product containing PAPP that is registered with the Australian Pesticides and Veterinary Medicines Authority (APVMA). Products are limited to manufactured baits (not available in liquid form).
PDWSA	Public drinking water source areas. These areas are proclaimed under legislation administered by the Department of Water and Environmental Regulation. Surface water catchments may include reservoir protection zones and groundwater resources may include wellhead protection zones.
Permit	A written approval, issued by an Authorising Officer, to possess and use prescribed quantities of specified products on a specified property. Previously known as an Authorisation Voucher.

Pest Management Business	A commercial business which employs or engages a Licensed Pest Management Technician.
Prescribed Pests	The declared vertebrate pest species that the specific 1080, PAPP and/or Strychnine products are registered to control.
Receiver	A person who is nominated to collect 1080, PAPP and/or Strychnine products from a licensed retailer. A Receiver may also be an Applicant and/or an Approved User. (See Appendix 1 for role descriptions).
Risk Assessment	The formal process used by an Authorising Officer to assess whether to approve the use of 1080, PAPP and/or Strychnine in accordance with the Application.
Section 72 Notices	Medicines and Poisons (Section 72) (Registered Pesticides 1080 and PAPP) Notice 2018 and Medicines and Poisons (Section 72) (Registered Pesticide Strychnine alkaloid) Notice 2018, published in the Government Gazette on 20 April 2018.
Strychnine	Strychnine is a highly toxic alkaloid which occurs naturally in some plant species.
Strychnine product	A manufactured product containing strychnine alkaloid crystals that is registered with the APVMA for use on wild dog traps and in field prepared baits for emu control in Western Australia.
1080 bait	An approved formulated meat, oat or other substance containing 1080 product, which is used in the field for the control of vertebrate pests.
1080 product	A manufactured product containing 1080 that is registered with the Australian Pesticides and Veterinary Medicines Authority (APVMA). Products include, but are not limited to, baits and 1080 coloured liquid concentrate (clc).

1 Introduction

1.1 Integrated pest management

A successful vertebrate pest control program will usually be the result of an integrated approach to pest management. Integrated pest management does not rely on any single strategy but uses a methodical mix of as many control techniques as practical. This approach helps avoid over-reliance on any one method that may otherwise result in a decrease in its effectiveness over time.

There are alternative options available to control vertebrate pest species, including the use of fumigants, shooting, trapping, warren destruction or biological control using viruses or (possibly in the future) sterility agents. These options should be considered as part of integrated pest control programs and are particularly useful where 1080, PAPP or Strychnine cannot be used safely, such as in recreational areas where these poisons would pose a potential risk to humans and non-target animals.

The pest control method selected will depend on a number of factors and it is important the advantages and disadvantages of all methods are given due consideration.

1.2 Legislative framework

The Medicines and Poisons Act 2014 is the primary legislation regulating the manufacture, sale and supply, use and possession of 1080, PAPP and strychnine in Western Australia (WA). These pesticides are classified as Schedule 7 poisons (labelled Dangerous Poisons) in the Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) and the Schedules of this document are adopted by the Medicines and Poisons Act 2014.

The Medicines and Poisons (Section 72) (Registered Pesticides 1080 and PAPP) Notice 2018 and Medicines and Poisons (Section 72) (Registered Pesticide Strychnine Alkaloid) Notice 2018, issued under the Medicines and Poisons Act 2014, impose conditions and restrictions on the sale, supply, possession and use of 1080, PAPP and Strychnine products. These Notices limit the handling of 1080, PAPP and Strychnine products to authorised or approved persons who have been trained or instructed in the safe handling and dealing with the poison. Unless otherwise exempt, a person must have written approval to possess or use 1080 and PAPP products from the DG, DOH or the DG of an Authorised Department. For landholders, the Permit scheme operated by DPIRD provides the required approval pathway.

The Medicines and Poisons (Section 72) (Registered Pesticides 1080 and PAPP) Notice 2018 and Medicines and Poisons (Section 72) (Registered Pesticide Strychnine Alkaloid) Notice 2018, also require a Code of Practice to be issued. This Code is developed collaboratively by the Authorised Departments and approved by the Department of Health.

In addition to the Medicines and Poisons Act 2014, these pesticides are regulated through other legislation including:

- The Health (Pesticides) Regulations 2011 contain general restrictions on the use of pesticides and a licensing scheme for those applying pesticides for profit.
- Various regulations made under the Dangerous Goods Safety Act 2004 include provisions relating to the storage (of larger quantities) and transport of these poisons.
- Requirements for containers and labelling of manufactured agricultural chemical products registered with the APVMA are found in the Agricultural and Veterinary Chemicals Code Act 1994 (Clth) (known as the AgVet Code). This Act is adopted in Western Australia through the Agricultural and Veterinary Chemicals (Western Australia) Act 1995.

1.3 Scope of the Code of Practice

This Code may be cited as the “Code of Practice for the Safe Use and Management of 1080, PAPP and Strychnine in Western Australia” (the Code).

As the Code is issued under the Section 72 Notices, compliance with the Code is required by all those handling 1080, PAPP and Strychnine products.

The Code:

- details the systems used to implement the authorisations and approvals described in the Section 72 Notices and
- provides guidance on how to achieve safe manufacture, sale and supply, transport, storage, use and disposal of 1080, PAPP and Strychnine products.

The Code applies to:

- All manufactured 1080, PAPP and Strychnine products and
- Field-prepared baits containing 1080 or Strychnine.

The Code does not apply to any pesticide other than 1080, PAPP or Strychnine.

The Code only applies within Western Australia.

Where an Approved User or Approved Pastoralist is in breach of the Code they may:

- Be required to undertake further training
- Lose their approval to use 1080, PAPP or Strychnine
- Be prosecuted.

2 Manufacture and wholesale supply of 1080, PAPP and Strychnine products

In order to manufacture and supply 1080, PAPP and Strychnine products by wholesale from within WA, a business must hold a licence under the Medicines and Poisons Act 2014. Applications for these licences are assessed and processed by the Medicines and Poisons Regulation Branch of the Department of Health.

Licences are generally only issued to persons with an appropriate formal qualification or at least 5 years relevant experience. The policy of the Department of Health is that manufacturer/wholesaler licences are only issued for the manufacture and wholesaling of APVMA registered products.

Manufacturers and wholesalers can only supply the following entities, provided appropriate proof of authority has been supplied (which should be documented):

- Other licensed manufacturers and wholesalers (proof of licence),
- Licensed retailers (proof of licence),
- Registered Pest Management Businesses who employ LPMTs with a 1080, PAPP or Strychnine endorsement (proof of registration),
- Authorised Officers (instrument of authority), or
- Authorised Persons (instrument of authority).

3 Retail sale and supply of 1080, PAPP and Strychnine products

In order to supply 1080, PAPP and Strychnine products by retail from within WA, a business must hold a licence under the Medicines and Poisons Act 2014. Applications for these licences are assessed and processed by the Medicines and Poisons Regulation Branch of the Department of Health.

Licences are generally only issued to persons with an appropriate formal qualification or at least 5 years relevant experience. The policy of the Department of Health is that Schedule 7 retail licences for agricultural and veterinary chemicals are only issued for the sale and supply of APVMA registered products.

Licensed retailers may only supply to the following entities, provided appropriate proof of authority has been supplied (which should be documented):

- A Receiver nominated on a current Permit (permit sent to retailer electronically by DPIRD).
- Approved Users authorised by the DG, DOH (instrument of authority),
- Authorised Officers (instrument of authority),
- Authorised Persons (instrument of authority),
- Registered Pest Management Businesses (proof of registration),
- Licensed Pest Management Technicians (proof of 1080, PAPP or Strychnine endorsement on licence).

4 Transport

Transportation of commercial quantities of 1080, PAPP and Strychnine products is restricted to couriers, common carriers, and other persons authorised by the DG of an Authorised Department. The transport of 1080, PAPP and Strychnine products must comply with the:

- Health (Pesticides) Regulations 2011,
- Dangerous Goods Safety Act 2004 (including the Australian Code for the Transport of Dangerous Goods by Road and Rail, ADG Code) and
- Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007.

A Safety Data Sheet (SDS) must be supplied by the manufacturer/wholesaler or retailer, and must accompany the transport of 1080, PAPP or Strychnine products.

All 1080, PAPP and Strychnine products must be transported to minimise the risk of contamination of people, food, or animals. All 1080, PAPP or Strychnine products must be placed into a locked metal container or cage or approved equivalent, labelled with the word 'Poison', and securely fixed/locked to the tray of a vehicle (utility or similar). The DG of an Authorised Department may approve a written application to vary these arrangements provided a similar level of transport security is achieved and maintained.

If a larger quantity of 1080 concentrate (clc) is being transported, even if transport is non-commercial (such as by an Approved pastoralist), the ADG Code may apply. Manufactured products such as ready-to-lay oats and meat baits to control wild dogs and foxes are not considered dangerous goods under the ADG Code.

5 Storage

Both the Medicines and Poisons legislation and the Health (Pesticides) Regulations 2011 require all 1080, PAPP and Strychnine products be stored in their original labelled

containers, with the manufacturer's label in place and intact. Products should be stored in accordance with the label instructions.

In the retail setting, all Schedule 7 poisons must be stored so they are only accessible to the business owner, employees and persons authorised to purchase the poisons (when accompanied by the business owner or an employee).

Persons approved to use 1080, PAPP and Strychnine products must store them in a double locked situation or as approved by an Authorising Officer, except when required for immediate use. A locked box or locked cabinet inside a locked shed is considered sufficient. Access must be limited to those persons with responsibility for custody of the stored 1080, PAPP or Strychnine products.

Approved Users must not store 1080, PAPP and Strychnine products after the approved baiting period stated on the Permit, unless the Approved User has specific approval or authority to store baits and/or products outside the baiting period.

When Approved pastoralists are storing concentrates (including liquids and poisoned oats, applicable to 1080 only) that are not required for immediate use, these preparations must be kept dry, in their original labelled container and returned to premises which are capable of being locked. They must be stored inside a chemical safe or equivalent approved by an Authorising Officer. The chemical safe must be fastened to a solid concrete floor (not concrete slabs), attached to the wall of the premises and labelled with the word 'Poison'. Access to the safe must be restricted to persons with responsibility for custody of the stored 1080 concentrate. Appropriate signage must be displayed on the premises adjacent to the main entry indicating hazardous chemicals are being stored on site.

6 Requirements for record keeping and auditing

6.1 Record keeping policy

All persons dealing with 1080, PAPP and Strychnine products must keep records of the storage, transfer and use of these products unless otherwise exempted by the DG, DOH. Records must:

- Include all 1080, PAPP and Strychnine products,
- Include details of receipt from, and consignment to, Licensed manufacturers/wholesalers, Licensed retailers, Licensed Pest Management Technicians and Approved Users
- Include a register of all 1080, PAPP and Strychnine products stored.

Records of supply to a Receiver or Approved User must include the identification number of the Permit issued by the Authorised Department and must be signed by the person supplying the 1080, PAPP or Strychnine and the person receiving these pesticide products.

Licensed manufacturers/wholesalers and licensed retailers must keep these records for at least 5 years. The Health (Pesticides) Regulations 2011, require records of pest management treatments undertaken by LMPT to be kept for 3 years. Other records must be kept for at least 2 years from the date the record was made.

6.2 Authorised Departments

Applications – a centralised recording system must be maintained which records the baiting proposal, including:

- The purpose of the baiting program

- Its timing, and location
- The type and volume of 1080, PAPP or Strychnine product and
- The names and addresses of Applicants.

Permits – in addition to the above, the recording system must provide details of:

- The quantity, type and concentration of products or baits approved
- Details of the Risk Assessment and any conditions imposed on the Permit
- The names and addresses of Nominated Retailers, Receivers, Approved Pastoralists and/or Approved Users
- The unique identification number on the Permit and
- A copy of the Permit must be retained.

Audits – Authorised Departments must undertake quality assurance and internal audits, at a minimum rate of at least 3% annually for compliance with the:

- Section 72 Notices
- the Code of Practice and
- any internal policies and procedures.

The report of these audits must be provided to the DOH on request.

Poisoning of non-target animals – Authorised Departments must retain records of all reported poisoning incidents involving non-target animals that may have resulted from a baiting program.

Human poisoning – Authorised Departments must retain records of all suspected human poisoning incidents relating to 1080, PAPP or Strychnine including a copy of reports made to the Police and DOH.

6.3 Department of Health

Compliance audits – to ensure the provisions of the Medicines and Poisons Act 2014 (including the Section 72 Notices), Health (Pesticides) Regulations 2011 and the Code of Practice are being met by licensed manufacturers/wholesalers, licensed Schedule 7 retailers and LPMTs, compliance audits must be undertaken on a regular basis and records maintained.

Records of all incidents and accidents reported to the DOH must be retained.

6.4 Licensed manufacturers/wholesalers and licensed retailers

There are mandatory record keeping requirements under the Medicines and Poisons Regulations 2016 for all sale and supply of Schedule 7 poisons by licensed manufacturers/wholesalers and licensed retailers. Records must be kept for at least five years and be available for inspection by officers authorised under the Medicines and Poisons Act 2014.

7 Accident and incident reporting

7.1 Investigation policy

All accidents or incidents involving 1080, PAPP and Strychnine products that contravene, or have the potential to contravene the Medicines and Poisons legislation, the Section 72

Notices or the Code must be immediately reported to the appropriate Authorised Department. The Authorised Department will initially investigate the accident or incident according to the Incident Investigation Protocol (see Section 7.4 below) and submit a report to the DG, DOH.

Licensed manufacturers/wholesalers, licensed retailers and couriers must report all incidents involving 1080, PAPP and Strychnine products directly to the Chief Pharmacist, DOH.

DPIRD Approved Users and Authorised Officers/Authorised Persons must report incidents involving 1080, PAPP and Strychnine products to the DPIRD Investigations Coordinator.

For LPMT and registered Pest Management Businesses, all accidents where a human is injured or dies must be reported to the Chief Health Officer at the DOH (in accordance with the Health (Pesticides) Regulations 2011).

7.2 Incident investigation coordinators

The DG of each Authorised Department must designate a departmental officer as an Incident Investigation Coordinator, and at least one proxy/deputy, to ensure compliance with the Incident Investigation Protocol and responses set out in this Code. Where possible, Incident Investigation Coordinators should not be involved in Risk Assessment of Applications, or the issuing of Permits.

See Section 8.9.2 for training requirements for Incident Investigation Coordinators.

7.3 Classification of incidents

Incidents are classified as 'serious' or 'non-serious' depending on the risk to human health and non-target species and the degree to which the Code has been violated.

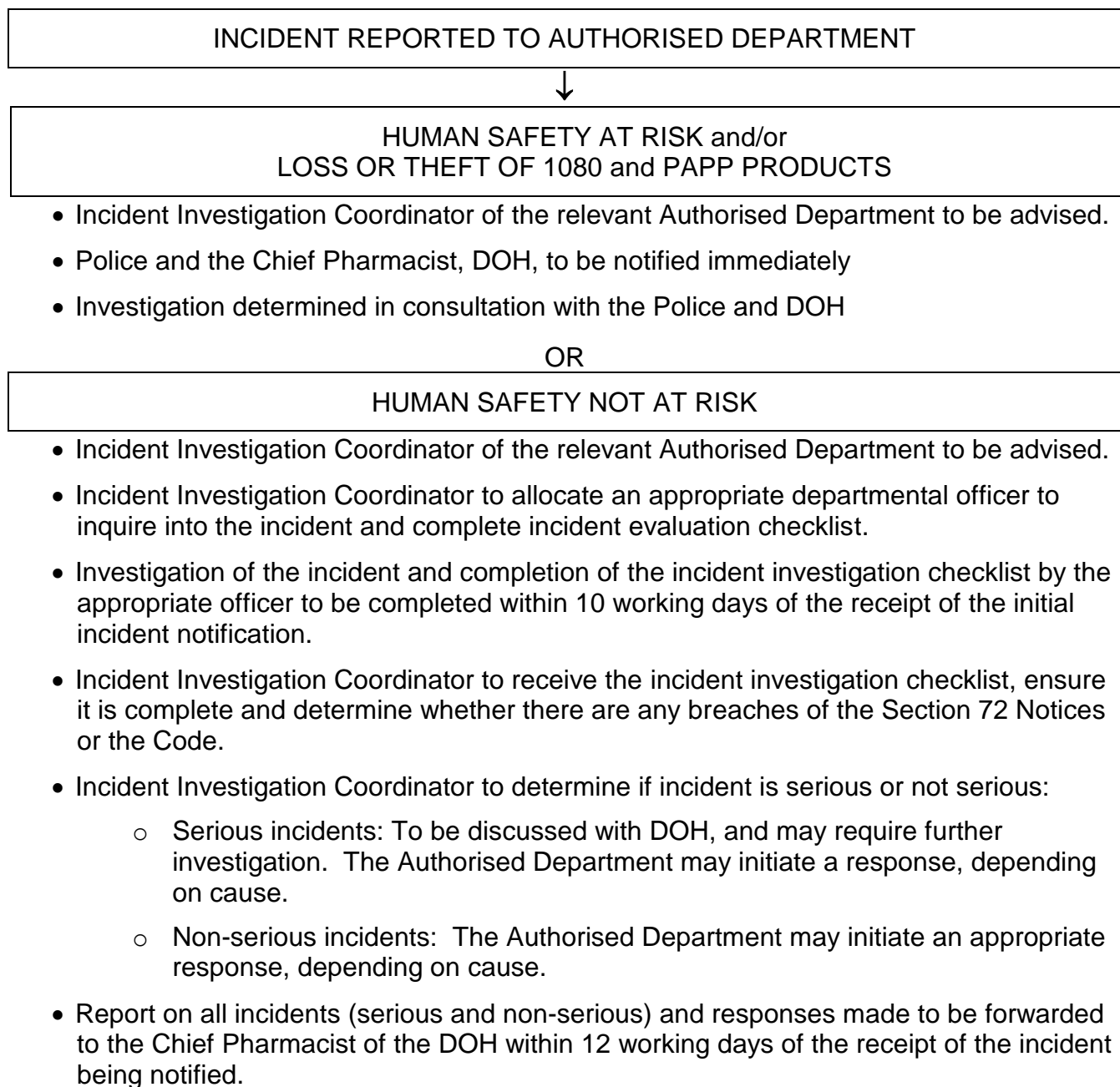
Serious incidents, which would generally result in remedial action or sanctions, include, but are not limited to:

- Incidents that pose a potential or actual risk to human health
- Incidents where records relating to an adverse incident is withheld
- Where there is more than one similar incident in the same locality and close together in time
- Where there is a pattern of unwanted outcomes
- Unapproved baiting
- Malicious intent known or suspected
- Gross negligence known or suspected
- Involvement by a repeat offender of the misuse of 1080, PAPP or Strychnine products
- Loss or theft of 1080, PAPP or Strychnine product.

Non-serious incidents, which would generally not result in remedial action or sanctions, include, but are not limited to:

- Incidents that do not involve a risk to human health
- Single incidents
- Unexplained death of non-target species suspected, but not proven, to be a result of exposure to 1080, PAPP or Strychnine product.

7.4 Incident investigation protocol



7.5 Agency roles in incident investigation and response

7.5.1 Role of the Department of Health

- Independently investigate incidents reported by Authorised Departments, if required.
- Investigate, independently or by liaising with the Police, any adverse human involvement in an incident involving 1080, PAPP and Strychnine products.
- Receive and assess all incident reports from Authorised Departments.
- Initiate prosecutions if appropriate.
- Advise Authorised Departments of any investigations and relevant outcomes.

7.5.2 Role of the Authorised Departments

- Ensure all departmental officers involved in the investigation of incidents have the appropriate skills.

- Designate a departmental officer as an Incident Investigation Coordinator and at least one proxy/deputy, one of which must be available at all times.
- Ensure locally based departmental officers have the skills to evaluate a 1080, PAPP or Strychnine incident.
- Investigate incident reports according to the protocol above.
- Impose administrative sanctions (verbal or written caution, exclusion from access to 1080, PAPP or strychnine products etc.) as appropriate to the severity of the incident, or as recommended by the DG, DOH.
- Retrain relevant people, if appropriate.
- Conduct annual internal audits to check processes are being followed.

8 1080 and PAPP – information and specific requirements

8.1 What is 1080?

1080 is the sodium salt of fluoroacetic acid. 1080 has high chemical stability, high water solubility and is generally odourless and tasteless to humans. It is stable under normal environmental conditions, but starts to break down at temperatures around 110°C, and is usually fully degraded at 200°C.

1080 is absorbed through the gastrointestinal tract, open wounds, mucous membranes and the lungs. Although 1080 is readily leached from most baits, 1080 products generally maintain their toxicity until heavy dew, rainfall, or bait degradation occurs. Further information on the toxicity of 1080 can be found in the respective Safety Data Sheet (SDS).

8.2 Why use 1080?

Around 40 species of Western Australian native plants produce fluoroacetate as a “chemical” defence against over grazing. Almost all species belong to the genus *Gastrolobium* and are confined to the south-west corner of WA. Many of these toxic species contain very high levels of fluoroacetate (~2,600 mg per kg leaf). The toxin is most concentrated in the growing tips, young leaves, flowers and seeds, but is also present in woody tissue.

Native animals that have co-evolved with these toxic plants have developed varying degrees of tolerance to fluoroacetate. This tolerance persists throughout the food chain. Herbivores are generally the most tolerant, omnivorous species are moderate in their tolerance, and carnivores are the least tolerant. Birds are generally moderate in their 1080-sensitivity, and most reptiles and amphibians are insensitive to 1080. In addition, some carnivorous marsupials and bandicoots can have a low-level, innate tolerance to fluoroacetate. This is believed to be linked to their lower metabolic requirements. In contrast, introduced animals (e.g. foxes, rabbits, dogs, pigs) have not had long-term evolutionary exposure to fluoroacetate (1080) and are therefore generally highly susceptible to fluoroacetate poisoning.

Despite many Western Australian native animals having varying degrees of tolerance to 1080, because of their relatively small size, some species are nevertheless potentially at risk from 1080 baits. Consequently, baits must not be laid at times when, or in locations where, non-target wildlife is likely to be harmed by them. Where practical, bait placement and/or bait station design should be such that access to baits by non-target species is minimized. The Authorising Officer can provide further advice on these aspects, and may impose additional conditions to ensure that non-target species, or the environment, are not compromised during a baiting program.

Although the 1080 used in vertebrate pest control is synthetically produced, the active constituent is identical to the naturally occurring toxin. When used as directed, 1080 has high target specificity for controlling introduced vertebrate pests in Western Australia due to the tolerance of native animals and the high susceptibility of the introduced mammal species. Careful choice of the bait type and placement and the baiting method further increases the target specificity of 1080 baiting programs.

8.3 What is PAPP?

Para amino propiophenone (PAPP) is an aminophenone / phenol derivative (not a naturally occurring chemical). In its pure form it is a yellow crystalline powder. PAPP is moderately soluble in water and is readily biodegradable in soil. It does not bio-accumulate in the soil structure and is stable under normal environmental conditions, but starts to break down at temperatures around 140°C.

PAPP is absorbed through the gastrointestinal tract, but can be also be absorbed via open wounds and mucous membranes (similar to 1080). PAPP toxicity is rapid and relatively free of symptoms. PAPP is designed to be taken orally by dogs and foxes. Once absorbed PAPP will induce methaemoglobinaemia, the red blood cells are then unable to carry oxygen to the body and this leads to a rapid deficit of oxygen in vital organs (brain and heart). Death generally ranges between 45 to 90 minutes post intake of PAPP.

PAPP does not occur naturally in the environment, so there is no resistance among native animals in Australia (unlike 1080). Studies have identified that the PAPP starts to have an impact on the human body at a dose rate of between 0.8 – 1.8 mg / kg bw. Further information on toxicity of PAPP can be found in the Safety Data Sheet (SDS).

A dose rate exceeding about 25 mg/kg live weight will kill most dogs and foxes. Pets and working dogs (domesticated dogs) are impacted at the same level as wild dogs.

PAPP is toxic to most native wildlife in Australia (including goannas, bandicoots, birds and mammals). For this reason PAPP is not licensed for aerial baiting programmes. Ground baiting with PAPP should only be considered when non-target species are less active.

PAPP is not a replacement for 1080, but rather another tool to be used in specific circumstances for the management and control of wild dogs and foxes in Australia.

8.4 Why use PAPP?

PAPP is different to 1080 in two distinct ways.

Firstly, unlike 1080 for which there is no antidote, the methaemoglobinaemia caused by PAPP can be reversed by methylene blue. However, to be effective, methylene blue must be administered intravenously and must also be given very soon after poisoning with PAPP has occurred (preferably within 30 minutes of an animal consuming the bait). For animals, methylene blue injection treatment must be by a veterinary surgeon and animals will generally also be treated with supportive therapies such as oxygen and possibly charcoal absorbent or induced vomiting. For humans, methylene blue treatment may also be administered by medical staff in the hospital setting. Methylene blue can itself be toxic in overdose.

Secondly, research indicates PAPP is outwardly more humane to wild dogs and foxes compared to 1080. Onset of symptoms with PAPP is generally around 30 minutes and death

ranges between 45 to 90 minutes for dogs and foxes. By contrast, for 1080 onset of symptoms is generally between 3 to 20 hours (dependant on size of dog and dose rate) and death may take a further 2 to 3 hours.

8.5 Which bait to use – 1080 or PAPP?

The choice of which control agent for wild dog / fox control (1080 or PAPP) will depend on a number of factors. Factors to consider may include (but are not limited to):

- PAPP cannot be used for aerial baiting programmes in Western Australia.
- The level of native animal activity in baiting area as most native animals have a degree of tolerance to 1080, but have low tolerance to PAPP. PAPP should only be considered when native fauna are not active or present.
- 1080 is available as a manufactured bait product, an injectable liquid for fresh baits and in capsules for CPEs while PAPP is only currently available as a manufactured bait.
- What control programmes are currently being used by neighbours and / or the local Biosecurity Group and the community's current wild dog / fox control plan
- Cost of the 1080 vs PAPP
- Which bait products are stocked by the local Schedule 7 retailer
- The risk of secondary poisoning – PAPP has less risk of secondary poisoning.

A DPIRD Biosecurity Officer or a representative from the local Biosecurity Group may be able to assist if farmers and pastoralists are unsure which baits to use.

The bait chosen should be based on the risk assessment prepared for the control programme and the issues and factors raised above. Each bait type has its advantages and disadvantages and these will vary within each baiting programme, location, and time of season.

8.6 Available forms of 1080 and PAPP

For wild dog, fox and dingo control 1080 is available in Western Australia in four forms:

1. A liquid concentrate for injection into raw meat baits (only available to LPMTs and Approved pastoralists) for fox and wild dog control. Also available in liquid concentrate for mixing with grain for rabbit and pig baiting (only available to LPMTs).
2. Manufactured baits for fox, wild dog and pig control.
3. 1080 impregnated oats for rabbits, fox and wild dog control.
4. Capsules for use in Canid Pest Ejectors (CPE) for foxes and wild dogs.

PAPP is only available in Western Australia in one form – manufactured meat baits for fox and wild dog control.

8.7 Usage Guidelines

Further information on how to use 1080 and PAPP products safely and effectively is provided in a set of guidelines (Farmnotes) and a Landholder Information Package developed by DPIRD. These materials are available at www.dpiird.wa.gov.au (Agriculture and Food Division) or from a Biosecurity Officer at the nearest DPIRD office.

8.8 Application and Permit

8.8.1 Uses that can be approved

The use of 1080 and PAPP is restricted to those persons who are Approved or appropriately Authorised, in accordance with the Section 72 Notice, the Code, label directions and/or a Minor Use Permit issued by the APVMA.

Approved Users and Approved Pastoralists must only use 1080 and PAPP products for purposes that have been approved by the DG of an Authorised Department, or the DG, DOH, and must comply with any written procedures and instructions provided, or conditions imposed, by an Authorising Officer.

Approved uses for 1080 and PAPP products are summarised as follows:

- DPIRD: for the control of declared pests for the purpose of agriculture and related industries protection, or where preservation of biodiversity values associated with agricultural and pastoral lands is required (e.g. remnant bush protection), or
- DBCA: for the control of pests for the purpose of nature conservation.

8.8.2 Land holding restrictions

Permits will not be issued to applicants with land holdings of less than 10 (ten) hectares (24.7 acres) unless they are part of a community organised baiting / control program. For land holdings of less than 10 hectares in total size, other control options such as trapping and fencing are recommended.

DPIRD does not issue Permits for conservation reasons (e.g. conservation of native animals on non-farming land). For this usage pattern, contact DBCA. Permits issued by DPIRD are for the protection of agricultural and pastoral assets only.

DBCA does not issue Permits on farming land for conservation reasons where long term bona fide conservation benefits cannot be demonstrated.

8.8.3 Categories of Applicants

The following persons may be Applicants:

- A landowner/occupier
- An Agent
- An Authorised Officer or
- An Authorised Person.

An Agent must be able to provide evidence of appointment. Authorised Officers and Authorised Persons must be able to demonstrate they are acting in a regulatory capacity

An Applicant must apply for a Permit to use specified 1080 and PAPP baits or products on a specified property during one or more specified periods, and must identify by name and address:

- the Receivers (up to five people),
- the Approved User(s)/Pastoralist and
- the Nominated Retailer.

The Applicant may also be a Receiver and/or Approved User or Approved Pastoralist. (see Appendix 1 for more information).

An Application may identify up to five persons to be Receivers. Where products or baits are distributed by means of a recognised postal, or courier, company, the addressee shall be considered the Receiver.

An Application may identify more than one Approved User.

The Approved User(s) or Approved Pastoralist must be appropriately trained (see Section 8.9).

Approval to use 1080 or PAPP products or baits can only be given by an Authorising Officer.

When an Application is received, the Authorising Officer must conduct a Risk Assessment in accordance with the requirements of Section 8.10 of this Code.

If the Application is approved, the Authorising Officer must:

- Issue a Permit containing the information outlined at Section 8.8.4 and
- If any special conditions are included in the Permit, be satisfied that the Applicant is aware of these conditions.

If the Application is not approved, the Authorising Officer must advise the Applicant as soon as possible, with the reasons for rejecting the Application. The Applicant may, within 30 days of the date of the rejection, lodge an appeal with the DG DOH or the State Administrative Tribunal.

It is the responsibility of the Applicant to advise the Approved User(s) of any special conditions or restrictions included in the Permit.

An Authorising Officer may revoke or impose additional conditions on the Permit to use 1080 and PAPP at any time by written notice to the Applicant. It is the Applicant's responsibility to advise the Approved User(s) of any changes, and the responsibility of the Approved User(s) to apply these changes.

8.8.4 The Permit

The Permit carries a unique number referenced back to the respective Application and must identify:

- The name and address of the Applicant
- The name and address of the Receiver(s). If this is not the Applicant, then he/she must be nominated in the Application
- The name and address of the Approved Pastoralist, (if appropriate)
- The name and address of the Approved User(s)
- The name and agency of the Authorising Officer
- The expiry date for the period during which 1080 and PAPP products or baits can be supplied and used
- The quantity, type and concentration of 1080 and PAPP products or baits that can be supplied within a specified period of time
- The name and address of the Nominated Retailer who will supply products or baits in accordance with the Permit and
- Any other information as required by the Authorising Officer.

The Permit, once approved, will be distributed by the Authorising Officer as follows:

- Original hard copy to the Applicant and
- Electronic copy to the Nominated Retailer.

8.9 Training

All persons in possession of 1080 and PAPP products must receive training (or, if appropriate, information) required by their role and commensurate with the level of risk (see also Appendix 1).

8.9.1 Authorising Officers, Authorised Officers and Authorised Persons:

Authorising Officers, Authorised Officers and Authorised Persons must successfully complete a course approved by the DG, DOH and delivered by an accredited trainer (known as the Basic Training Course). The Basic Training Course must include the following:

- Legislative requirements for the supply, possession, storage and use of 1080 and PAPP in Western Australia
- Requirements of an Application, the procedures necessary and the notification required to carry out a baiting program
- The key factors required to conduct 1080 and PAPP baiting in a safe and compliant manner
- Ability to identify signs of poisoning and effect appropriate First Aid treatment
- Requirements for the safe storage and transportation of 1080 and PAPP products
- Requirements for record keeping and notification of accidents and incidents.

Authorising Officers must also undertake training to acquire and update skills needed to conduct a Risk Assessment and to investigate an incident involving 1080 and PAPP.

Refresher training must be undertaken regularly to maintain competency.

8.9.2 Incident investigation coordinators

Incident Investigation Coordinators must have successfully completed the Basic Training Course and the Risk Assessment training, which includes basic instruction in investigation protocols and risk assessment, or have relevant experience and/or qualification as an investigator.

8.9.3 Approved Pastoralists

Approved Pastoralists must provide evidence that they are nationally accredited in the following competencies after completing training approved by the DG, DOH:

- AHCCHM303A - Prepare and apply chemicals, and
- AHCCHM304A - Transport, handle and store chemicals.

8.9.4 Licensed Pest Management Technicians

Licensed Pest Management Technicians must hold a current pesticides licence endorsed for the control of feral animals, after completing training approved by the DOH. The licence will also indicate the type of 1080 or PAPP products the Technician has been trained to use.

8.9.5 Other Approved Users

Approved Users other than Authorised Officers, Authorised Persons or Licensed Pest Management Technicians must be given:

- Adequate written instruction in the safe and effective use of 1080 and PAPP products from the Authorising Officer before the Permit is issued,
- If commensurate with the level of risk, the completion of a verbal or written questionnaire may be required, and
- Practical field instructions as required.

8.9.6 Receivers, Couriers and Carriers

The person supplying a 1080 and PAPP product to a Receiver, Courier or Carrier is responsible for providing them with appropriate instruction on the safe handling, storage and transport of 1080 and PAPP products. A current SDS must accompany the transport of 1080 and PAPP.

8.10 Risk Assessment

The type and placement of 1080 and PAPP products proposed for use throughout the Permit's duration must be specified in the Application so any additional risk presented by variations to the Application can be assessed.

In the case of very large landholdings where the movement of targeted pest animals cannot be predicted, it is acceptable in the Application to identify those exclusion zones where 1080 and PAPP baits will **not** be laid, such as adjacent to a homestead and buildings etc.

Applications must include an assessment of the presence and species of native fauna, that may be susceptible to the type of poison proposed for use.

Compliance with the directions of use will mitigate the risks of using PAPP where native fauna are present.

A detailed scale map must accompany the Application. The map must indicate the location of:

- Dwellings on the property to be baited, and dwellings on neighbouring properties within 150 metres of the common boundary
- Major roads and tracks
- Permanent or flowing water bodies
- Formal constructed recreational sites
- Exclusion zones where 1080, PAPP baits will not be used
- The general areas where baiting is likely to occur
- The proposed location of poison warning signs
- In the case of PAPP, all bush reserves and National parks, flora and fauna reserves, crown land, roadside reserves and revegetation areas within 500 metres of the property boundary must be clearly marked and labelled and
- Any additional requirements requested by the Authorising Officer.

A Risk Assessment must be undertaken by an Authorising Officer before a Permit is issued to use a 1080 or PAPP bait or product on a specified property.

The Risk Assessment must take into account (but is not limited to) the

- location
- land use
- presence of susceptible native fauna species
- proximity and risk to native and domestic non-target species
- protection of human health and safety
- water catchments (particularly including public drinking water source areas and other sensitive water sources) and
- protection of the environment.

Following the completion of the Risk Assessment, the application to use 1080 and PAPP will be assigned by an Authorising Officer to one of the following risk categories:

- **Manageable Risk (M)** : Any area or situation where 1080 and PAPP baits can be used in accordance with the label Directions for Use with minimal risk, or any area or situation where the use of 1080 and PAPP baits poses an acceptable risk provided appropriate additional precautions imposed by the Authorising Officer are taken. Approval to bait (i.e. a Permit) may be granted by the Authorising Officer, subject to conditions which may vary for different areas that have been nominated on the Baiting Application.
- **Extreme Risk (E)**: Any area or situation where the use of 1080 and PAPP baits are likely to pose an unacceptable risk to human health or non-target animals, no matter what precautions are taken or conditions imposed on the application. Approval to bait will be refused.

The Authorising Officer may deem a Permit be valid for a period of up to five years, providing the circumstances that prevailed when the Risk Assessment was undertaken remain unchanged. Matters such as a change in ownership or occupancy of the property, a change to the land use or structure of the property, or change to surrounding land use, will require a new Risk Assessment. The permit holder is responsible for notifying the Authorising Officer of any changes that may affect the risk factors or any proposed changes to nominated persons.

The nomination of persons other than those already identified on a Permit to act as Receivers or Approved Users in relation to that Permit, will require the Permit to be amended once the Authorising Officer is satisfied the nominated persons are trained in accordance with Section 8.9 of this Code.

8.11 Clean up and waste disposal after 1080 and PAPP baiting

8.11.1 Disposal of animal carcasses

To prevent secondary poisoning of non-target animal species, during the period of baiting and for 14 days after conclusion of baiting, target animals found poisoned or dead on the baited property, or any adjacent property, must be disposed of by:

- Burying to a depth of at least 0.5 metre below natural ground level, or
- Complete incineration of the carcass, except when local fire bans are in place.

The location of sensitive water sources (including both public and private drinking water supplies) must be considered when choosing burial sites for carcasses, due to the risks from both the poisons themselves and carcass decomposition more generally. The Department of Water and Environmental Regulation (DWER) makes specific recommendations in relation to animal carcass disposal in gazetted public drinking water source areas (PDWSA). Water

Quality Protection Note 96¹ recommends carcasses should not be buried in PDWSA but where removal is not feasible, carcasses should be buried at least 100 metres from the centre line of any watercourse or 100 metres from the high water mark of any reservoir, in individual pits with a maximum separation distance above the average annual maximum ground water level.

In addition, the skin must not be removed from animal carcasses nor the animal carcass used for human consumption, pet food, or any other purpose.

8.11.2 Disposal of unused 1080 and PAPP baits

At the conclusion of the approved baiting period, all unused and unconsumed baits in the possession of the Approved User/Pastoralist must be disposed of by:

- Burial at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course*, on the same property where baiting was carried out or
- Burial at a gazetted land-fill site with the approval of, and under the supervision of, the local government authority or
- By an alternative means approved by the Authorising Officer, e.g. covering uneaten grain baits with soil

unless the baiting period has been extended by the Authorising Officer (only in extenuating circumstances), or the Approved User has approval or authority to store baits and/or products.

*The location of sensitive water sources (including PDWSA and private water supplies) must be considered when choosing a site to bury baits. Larger exclusion zones are necessary around PDWSA and other sensitive water sources. Unless impractical, unused and unconsumed baits must be disposed of outside PDWSA.

The collection and disposal of baits on pastoral properties, crown land or other broad-scale operations is not required as it is impractical.

8.11.3 Disposal of used containers

Used 1080 and PAPP product containers must be disposed of by:

- Burial at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course* or
- Collection and disposal by a local government waste management authority (after thorough decontamination and puncturing, flattening or otherwise damaging to render unusable) or
- Disposal at a gazetted land-fill site, with the approval of, and under the supervision of, the local government authority.

* The location of sensitive water sources (including PDWSA and private water supplies) must be considered when choosing a site for disposal of used containers. Larger exclusion zones are necessary around PDWSA and other sensitive water sources. Unless impractical, used containers must be disposed of outside PDWSA.

¹ https://www.water.wa.gov.au/__data/assets/pdf_file/0016/4093/90470.pdf

8.12 Notification, warning signs and distance restrictions

8.12.1 Notification

Before 1080 and PAPP baits can be laid, the Approved User must notify the occupiers of:

- Any properties adjoining the land to be baited and
 - Any other property deemed appropriate by the Authorising officer
- at least 3 days but not more than 14 days before bait laying commences.

Notification must provide the following information:

- The intention to lay 1080 and/or PAPP baits
- The period and location of baiting
- The hazards associated with the use of 1080 and/or PAPP baits and
- The risks to human health if poisoned animals are handled or consumed.

If the start of baiting is delayed and the baiting period will extend beyond the cessation date given in the notice, another notice of intent to lay baits is required at least 3 days prior to the original cessation date, advising of the extension. Baiting cannot be undertaken past the expiry period of the Permit.

An exemption may be granted from the requirement to notify occupiers of adjacent properties in the case of targeted baiting programs that are well within a parcel of land (e.g. baiting well within a conservation reserve) and more than 2km from neighbour(s), at the discretion of the Authorising Officer.

Notification can be by:

- Letter, e-mail or facsimile
- Telephone, or in person, provided this is accompanied by a signed statutory declaration that the person approved to use 1080 and PAPP has spoken with the owners or occupiers of properties adjoining the land to be baited and
- (In the case of broad scale baiting programs), State and local media (newspapers, radio and television) as approved by the DG, DOH.

Records of all notifications should be kept by the Approved User for at least 5 years in the event that adverse incidents occur and proof of notification is required.

8.12.2 Warning Signs

Before 1080 and PAPP baits can be laid, the Permit Holder must ensure prominent warning signs are erected at entrances and strategic points on the property to be baited, alerting the public that 1080, PAPP baiting is taking place. Warning signs must comply with the 1080 and PAPP product label specifications and must include:

- The date that 1080 and PAPP baits were laid
- The contact numbers of the Applicant and (if applicable) the Approved User
- The pesticide name
- The target animals
- A warning that domestic animals and pets can be affected and
- A “no shooting or trapping” statement.

Alternative content on warning signs can be approved by the Authorising Officer.

The Approved User must maintain warning signs for at least four weeks after the period of authorised 1080 and PAPP bait laying has expired, or until all untaken 1080 and PAPP baits have been collected.

In the case of ongoing baiting operations that are carried out on a continuing basis, warning signs must state that baiting occurs on an ongoing basis.

8.12.3 Distance Restrictions

For ground baiting programs dried meat baits, fresh meat baits and egg baits (1080 baits) and PAPP baits must be placed no closer than:

- 150 metres from a dwelling,
- 20 metres from permanent or flowing water bodies and from the edge of formed/gazetted public roadways
- 5 metres from boundary fences.

For aerial baiting programs, 1080 baits must be dropped no closer than:

- 150 metres from a dwelling
- 20 metres from permanent or flowing water bodies
- 500 metres from all property boundaries and constructed recreation sites, and
- 250 metres from the edge of formed/gazetted public roadways.

Poisoned grain baits (1080 only) must be placed no closer than

- 5 metres from the edge of public roadways, public reserves and public places
- 20 metres from flowing water bodies
- 150 metres from a dwelling.

The Authorising Officer may vary the above distance restrictions for both ground and aerial baiting, provided the varied distance restrictions would not increase the risk to public safety or non-target species.

As part of their Risk Assessment, Authorising Officers take into account the presence of any gazetted public drinking water supply areas. DWER recommends a bait-free buffer be maintained around the full supply level of a reservoir water body extending for a minimum distance of 100 metres.

8.12.4 PAPP specific requirements

PAPP baits are NOT REGISTERED TO BE USED FOR AERIAL BAITING PROGRAMMES.

PAPP baits must comply with the same distance restrictions as 1080, and have additional requirements;

- PAPP baits are to be buried in a shallow hole (< 8cms deep) where the baits can be placed and covered with soil to reduce the access by non-target animals.
- PAPP bait stations are to be checked twice a week during the baiting programme.
- PAPP baits are not to be used in areas within 500 metres of native bush reserves, State or National Parks, flora and fauna reserves, crown land, roadside reserves and revegetation areas. This is due to PAPPs impact on native animals. Consider using PAPP only during periods of low native animal activity.
- No more than one bait per bait station (one bait is enough to kill a wild dog or fox)
- For pastoral regions, PAPP may be used (subject to the risk assessment) in peri-urban regions (around townships, cities and settlements), mine sites, around shed, homesteads

and watering points. It is not for extensive use on pastoral stations. Again, in pastoral regions do not use PAPP if there is evidence of recent native animal activity.

- Untaken PAPP baits and animal carcasses should be recovered (if possible) and disposed of in accordance with Sections 8.11.1 and 8.11.2.

8.13 Safety and first aid

For all emergencies or poisoning call 000 and seek medical assistance urgently.
Poisons Information Centre – call 13 11 26 (24 hours a day / 7 days a week).

All persons who handle or use 1080 and PAPP products must be thoroughly familiar with the safety directions on the label, and additional information found on the SDS.

It is important to note there is no effective antidote for 1080 poisoning and the use of methylene blue to reverse PAPP poisoning may not be suitable for all patients.

Persons undertaking approved training will receive First Aid and Safety instruction commensurate with the level of risk of exposure.

First Aid instructions are provided on the label of the 1080 and PAPP product. Current label instructions in the event of human poisoning are:

For 1080

“Speed in treatment is essential. If poisoning occurs, contact a doctor or Poisons Information Centre. Phone 13 11 26. If skin contact occurs, remove contaminated clothing and wash skin thoroughly. Remove from the contaminated area. Apply artificial respiration if not breathing. If in eyes, hold eyes open, flood with water for at least 15 minutes and see a doctor”.

For PAPP

“If poisoning occurs, contact a doctor or Poison Information Centre. Phone 13 11 26. Remove from contaminated area. Apply artificial respiration if not breathing. If poisoning occurs get to a doctor or hospital quickly”.

Any changes to these instructions will be reflected on the 1080 and PAPP product label and the Safety Data Sheet (SDS) which is available from licensed retailers and generally also from the manufacturer’s website.

8.14 Labelling and additional precautions

8.14.1 Labelling

APVMA product approval for registration includes approval of the product label. Products must be stored in their original container with the label intact.

The labelling of field prepared baits must follow the stipulations of the manufacturer of the concentrate used to make the field baits (applicable to 1080 only).

8.14.2 Precautions

1080 and PAPP products must not be used in domestic or home garden situations. Baits must not be laid in crops which are in mid to late developmental stages, or if contamination of produce is likely to occur.

Protection of Domestic and Farm Dogs: Domestic and farm dogs must not gain access to 1080 and PAPP products or poisoned animal carcasses, and may need to be restrained or muzzled for an appropriate length of time. It is important to note that where there has been no rainfall following baiting, the baits and poisoned carcasses may remain toxic to target and non-target animals for several months.

Protection of Livestock: Where 1080 poisoned grain has been used, domestic stock must be excluded from the baited area until all bait has been consumed, buried, or retrieved. Caution must be exercised when reintroducing ruminants to previously baited paddocks if relying only on rainfall to leach 1080 from surface applied baits. Covering any uneaten grain baits with soil will reduce the risk to livestock.

Protection of Wildlife, Fish, Crustaceans and Environment: 1080 and PAPP products must not be handled where there is a risk of contaminating food, animal feed or water supplies.

Other methods of control are discouraged during short term baiting programs. Trapping and shooting are discouraged because they interrupt normal animal behaviour and can lead to avoidance of baits.

9 Strychnine – information and specific requirements

9.1 What is Strychnine?

Strychnine is a plant sourced toxin discovered in 1818. It is manufactured from the dried ripe seeds of *Strychnos nux-vomica*, an evergreen tree found in South East Asia.

Natural strychnine is a colourless and crystalline substance which interferes with the central nervous system. It has a bitter taste and a slight odour. It can be ingested by inhalation, swallowing or absorption through eyes or mouth. Strychnine poisoning results in muscular convulsions and eventually death through asphyxia or sheer exhaustion. Signs of poisoning usually occur within 3 to 20 minutes from consuming the product. Most vertebrates are highly sensitive to Strychnine with acute LD 50s ranging from 0.5 (cat) to 12 (bobtail lizard) mg per kg.

There are three forms of Strychnine, but only the alkaloid form is used in Western Australia. Strychnine alkaloid is almost entirely water insoluble and hence is very stable in most environments.

Although some treatments help to alleviate symptoms, there are no effective antidotes to Strychnine poisoning, so great care is required in its use. As it is highly toxic, access to, and possession of Strychnine, is restricted by law.

9.2 Why use Strychnine?

The use of strychnine in Western Australia is restricted to only two uses: use on the jaws of wild dog traps and in baits for emu control.

9.2.1 Wild dog trapping

The use of strychnine on traps set for wild dog is mandatory and ensures trapped dogs die quickly. Use is restricted to:

- Pastoral areas as listed in Appendix 3 – Schedule 1 (extracted from Section 72 Notice)
- Adjacent agricultural areas as listed in Appendix 3 – Schedule 2 (extracted from Section 72 Notice) and
- Other locations approved by an Authorising Officer from DPIRD.

In all areas described above, a risk assessment of the proposed strychnine use must be conducted by an Authorising Officer prior to approving the supply of strychnine. The landholder or their nominated agent must also receive appropriate training in the correct and safe use of strychnine.

9.2.2 Emu control programme

Strychnine can be used for emu control during periods of high emu population pressure to reduce impacts on farming enterprises. This use of strychnine is **subject to the applicant obtaining a damage licence from the Department of Biodiversity, Conservation and Attractions (DBCA)**. LPMTs are able to prepare and lay strychnine treated grain baits for the control of emus.

Whilst 1080 is generally the most appropriate and preferred poison for animal pest control in Western Australia, emus have developed a high tolerance to this poison due to evolutionary exposure to plants containing fluoroacetate. It is therefore appropriate to use strychnine for emu control in conjunction with other integrated pest management techniques.

9.3 Where can Strychnine be used?

Strychnine is only permitted in certain local government areas in Western Australia (see Appendix 3).

Strychnine use in Western Australia is restricted to emu control during periods of high emu population affecting agriculture and is also mandatory on the jaws of wild dog traps. These are the only permitted purposes for strychnine use in Western Australia.

9.4 Available forms of Strychnine

Strychnine is only available in Western Australia in one form: Strychnine alkaloid crystals, 25g jar.

9.5 Usage Guidelines

Further information on how to use Strychnine products safely and effectively is provided in a set of guidelines (Farmnotes) and a Landholder Information Package developed by DPIRD.

These materials are available at www.dpird.wa.gov.au (Agriculture and Food Division) or from a Biosecurity Officer at the nearest DPIRD office.

9.6 Application and Permit

9.6.1 Uses that can be approved

The use of strychnine is restricted to those persons who are Approved or appropriately Authorised, in accordance with the Section 72 Notice, the Code, label directions and/or a Minor Use Permit issued by the APVMA.

Approved Users must only use strychnine products for purposes that have been approved by the DG of an Authorised Department, or the DG, DOH, and must comply with any written procedures and instructions provided, or conditions imposed, by an Authorising Officer.

Approved uses for strychnine products are summarised as follows:

- Strychnine for wild dog trapping can only be used by
 - Approved users and Authorised Officers
 - LPMTs and persons approved by the DG DOH
- Strychnine baits for emu control can only be used by
 - Authorised Officers and LPMTs
 - Persons approved by the DG DOH.

9.6.2 Land holding restrictions

Permits will not be issued to applicants with land holdings of less than 10 (ten) hectares (24.7 acres) unless they are part of a community organised baiting / control program. For land holdings of less than 10 hectares in total size other control options are recommended.

9.6.3 Categories of Applicants

The following persons may be Applicants:

- A landowner/occupier,
- An Agent,
- An Authorised Officer, or
- An Authorised Person.

An Agent must be able to provide evidence of appointment. Authorised Officers and Authorised Persons must be able to demonstrate that they are acting in a regulatory capacity.

An Applicant must apply for a Permit to use strychnine on a specified property during one or more specified periods, and must identify by name and address:

- the Receivers (up to five people),
- the Approved User(s) and
- the Nominated Retailer.

The Applicant may also be a Receiver and/or Approved User. (see Appendix 1 for more information).

An Application may identify up to five persons to be receivers. Where products are distributed by means of a recognised postal, or courier, company, the addressee shall be considered the receiver.

An Application may identify more than one Approved User.

The Approved User(s) must be appropriately trained (see Section 9.7)

Approval to use strychnine can only be given by an Authorising Officer.

When an Application is received, the Authorising Officer must conduct a Risk Assessment in accordance with the requirements of Section 9.8 of this Code.

If the Application is approved, the Authorising Officer must:

- Issue a Permit containing the information outlined at Section 9.6.4 and
- If any special conditions are included in the Permit, be satisfied that the Applicant is aware of these conditions.

If the Application is not approved, the Authorising Officer must advise the Applicant as soon as possible, with the reasons for rejecting the Application. The Applicant may, within 30 days of the date of the rejection, lodge an appeal with the DG DOH or to the State Administrative Tribunal.

It is the responsibility of the Applicant to advise the Approved User(s) of any special conditions or restrictions included in the Permit.

An Authorising Officer may revoke or impose additional conditions on the Permit to use strychnine at any time by written notice to the Applicant. It is the Applicant's responsibility to advise the Approved User(s) of any changes, and the responsibility of the Approved User(s) to apply these changes.

9.6.4 The Permit

The Permit carries a unique number referenced back to the respective Application and must identify:

- The name and address of the Applicant
- The name and address of the Receiver(s). If this is not the Applicant, then he/she must be nominated in the Application.
- The name and address of the Approved User(s)
- The name and agency of the Authorising Officer
- The expiry date for the period during which Strychnine can be supplied and used
- The quantity of Strychnine that can be supplied within a specified period of time
- The name and address of the Nominated Retailer who will supply products in accordance with the Permit and
- Other information as required by the Authorising Officer.

The Permit, once approved, will be distributed by the Authorising Officer as follows:

- Original hard copy to the Applicant and
- Electronic copy to the Nominated Retailer.

9.7 Training

All persons in possession of strychnine must receive training (or, if appropriate, information) required by their role and commensurate with the level of risk (see also Appendix 1).

9.7.1 Authorising Officers, Authorised Officers and Authorised Persons

Authorising Officers, Authorised Officers and Authorised Persons must successfully complete a course approved by the DG, DOH and delivered by an accredited trainer (known as the Basic Training Course). The Basic Training Course must include the following:

- Legislative requirements for the supply, possession, storage and use of Strychnine in Western Australia
- Requirements of an Application, the procedures necessary and the notification required to carry out a baiting or trapping program
- The key factors required to use strychnine in a safe and compliant manner
- Ability to identify signs of poisoning and effect appropriate First Aid treatment
- Requirements for the safe storage and transportation of Strychnine products and
- Requirements for record keeping and notification of accidents and incidents.

Authorising Officers must also undertake training to acquire and update skills needed to conduct a Risk Assessment and to investigate an incident involving strychnine.

Refresher training must be undertaken regularly to maintain competency.

9.7.2 Incident investigation coordinators

Incident Investigation Coordinators must have successfully completed the Basic Training Course and the Risk Assessment training, which includes basic instruction in investigation protocols and risk assessment, or have relevant experience and/or qualification as an investigator.

9.7.3 Licensed Pest Management Technicians

Licensed Pest Management Technicians must hold a current pesticides licence endorsed for the control of feral animals, after completing training approved by the DOH. The licence will also be specifically endorsed for Strychnine.

9.7.4 Other Approved Users

Approved Users other than Authorised Officers, Authorised Persons or Licensed Pest Management Technicians must be given:

- Adequate written instruction in the safe and effective use of strychnine from the Authorising Officer before the Permit is issued
- If commensurate with the level of risk, the completion of a verbal or written questionnaire may be required and
- Practical field instructions as required.

9.7.5 Receivers, Couriers and Carriers

The person supplying strychnine to a Receiver, Courier or Carrier is responsible for providing them with appropriate instruction on the safe handling, storage and transport of strychnine. A current SDS must accompany the transport of strychnine.

9.8 Risk assessment

The type and placement of strychnine proposed for use throughout the Permit's duration must be specified in the Application so that any additional risk presented by variations to the Application can be assessed.

In the case of very large landholdings where the movement of targeted pest animals cannot be predicted, it is acceptable in the Application to identify those exclusion zones where Strychnine treated traps or bait for emu control will **not** be used, such as adjacent to a homestead and buildings etc.

A detailed scale map must accompany the Application. The map must indicate the location of:

- Dwellings on the property where strychnine is to be used, and dwellings on neighbouring properties within 500 metres of the common boundary
- Major roads and tracks
- Permanent or flowing water bodies
- Formal constructed recreational sites
- Exclusion zones where Strychnine treated traps or Strychnine baits will not be used
- The general areas where trapping or baiting is likely to occur
- The proposed location of poison warning signs and
- Any additional requirements requested by the Authorising Officer.

A Risk Assessment must be undertaken by an Authorising Officer before a Permit is issued to use Strychnine on a specified property.

The Risk Assessment must take into account (but is not limited to) the

- location
- land use
- proximity and risk to native and domestic non-target species
- protection of human health and safety
- water catchments (particularly including public drinking water source areas and other sensitive water sources) and
- protection of the environment.

Following the completion of the Risk Assessment, the application to use strychnine will be assigned by an Authorising Officer to one of the following risk categories:

- **Manageable Risk (M)** : Any area or situation where Strychnine can be used in accordance with the label Directions for Use with minimal risk, or any area or situation where the use of Strychnine poses an acceptable risk provided appropriate additional precautions imposed by the Authorising Officer are taken. A Permit may be granted by the Authorising Officer, subject to conditions which may vary for different areas that have been nominated on the Application.
- **Extreme Risk (E)**: Any area or situation where the use of Strychnine is likely to pose an unacceptable risk to human health or non-target animals, no matter what

precautions are taken or conditions imposed on the application. Approval to use will be refused.

The Authorising Officer may deem a Permit be valid for a period of up to five years, providing the circumstances that prevailed when the Risk Assessment was undertaken remain unchanged. Matters such as a change in ownership or occupancy of the property, a change to the land use or structure of the property, or change to surrounding land use, will require a new Risk Assessment. The permit holder is responsible for notifying the authorising officer of any changes that may affect the risk factors or any proposed changes to nominated persons.

The nomination of persons other than those already identified on a Permit to act as Receivers or Approved Users in relation to that Permit, will require the Permit to be amended once the Authorising Officer is satisfied the nominated persons are trained in accordance with Section 9.7 of this Code.

9.9 Clean up and waste disposal after strychnine use

9.9.1 Disposal of animal carcasses

To prevent secondary poisoning of non-target animal species, during the period of strychnine use and for 14 days after the conclusion of strychnine use, target animals found poisoned or dead on the baited property, or any adjacent property, must be disposed of by:

- Burying to a depth of at least 0.5 metre below natural ground level, or
- Complete incineration of the carcass, except when local fire bans are in place.

The location of sensitive water sources (including both public and private drinking water supplies) must be considered when choosing burial sites for carcasses, due to the risks from both the poisons themselves and carcass decomposition more generally. The Department of Water and Environmental Regulation (DWER) makes specific recommendations in relation to animal carcass disposal in gazetted public drinking water source areas (PDWSA). Water Quality Protection Note 96² recommends carcasses should not be buried in PDWSA but, where removal is not feasible, carcasses should be buried at least 100 metres from the centre line of any watercourse or 100 metres from the high water mark of any reservoir, in individual pits with a maximum separation distance above the average annual maximum ground water level.

In addition, the skin must not be removed from animal carcasses nor the animal carcass used for human consumption, pet food, or any other purpose.

9.9.2 Disposal of unused strychnine baits

At the conclusion of the approved baiting period, all unused and unconsumed baits must be disposed of by complete incineration (not when local fire bans are in place) and the resulting ash buried at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course, on the same property where baiting was carried out.

The location of sensitive water sources (including PDWSA and private water supplies) must be considered when choosing a site to bury ash. Larger exclusion zones are necessary around PDWSA and other sensitive water sources. Unless impractical, burial should not occur in PDWSA.

² https://www.water.wa.gov.au/__data/assets/pdf_file/0016/4093/90470.pdf

Baits may only be retained if the baiting period has been extended by the Authorising Officer (only in extenuating circumstances), or the Approved User has approval or authority to store baits.

The collection and disposal of baits on pastoral properties, crown land or other broad-scale operations is not required as it is impractical.

9.9.3 Disposal of used containers and materials used on traps

Impregnated hessian or other cloth used on traps must be incinerated prior to disposal.

Used Strychnine containers must be thoroughly decontaminated and punctured, flattened or otherwise damaged to render unusable.

Waste treated in the manner described above must then be disposed of by:

- Burial at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course* or
- Collection and disposal by a local government waste management authority (after thorough decontamination) or
- Disposal at a gazetted land-fill site, with the approval of, and under the supervision of, the local government authority.

*The location of sensitive water sources (including PDWSA and private water supplies) must be considered when choosing a site to bury ash or used containers. Larger exclusion zones are necessary around PDWSA and other sensitive water sources. Unless impractical, burial should not occur in PDWSA.

9.10 Notification, warning signs and distance restrictions

9.10.1 Notification

Before Strychnine is used on traps or Strychnine baits are laid, the Approved User (including LPMT or Authorised Officer if applicable) must notify the occupiers of:

- Any properties adjoining the land to be baited and
- Any other property deemed appropriate by the Authorising Officer,

at least 3 days but not more than 14 days before Strychnine use commences.

Notification must provide the following information:

- The intention to lay Strychnine baits / use Strychnine on traps
- The period and location of baits and/or traps
- The hazards associated with the use of strychnine baits and/or traps and
- The risks to human health if poisoned animals are handled or consumed.

If the start of baiting or trapping is delayed and the Strychnine use period will extend beyond the cessation date given in the notice, another notice of intent to lay baits or traps is required at least 3 days prior to the original cessation date, advising of the extension. Baiting / trapping cannot be undertaken past the expiry period of the Permit.

An exemption may be granted from the requirement to notify occupiers of adjacent properties in the case of targeted baiting or trapping programs that are well within a parcel of land and more than 2km from neighbour(s), at the discretion of the Authorising Officer.

Notification can be by:

- Letter, e-mail or facsimile or
- Telephone, or in person, provided this is accompanied by a signed statutory declaration that the person approved to use strychnine has spoken with the owners or occupiers of properties adjoining the land to be baited.

Records of all notifications should be kept by the Approved User for at least 5 years in the event that adverse incidents occur and proof of notification is required.

9.10.2 Warning Signs

Before Strychnine baits / traps can be laid, the Approved User (including LPMT or Authorised officer if applicable) must ensure prominent warning signs are erected at entrances and strategic points on the property where Strychnine will be used, alerting the public that Strychnine is being used. Warning signs must include:

- The date that strychnine baits or traps were laid
- The contact numbers of the Applicant and (if applicable) the person approved to use the Strychnine
- The pesticide name
- The target animals
- A warning that domestic animals and pets can be affected and
- A “no shooting or trapping” statement.

Alternative content on warning signs can be approved by the Authorising Officer.

The Approved User must maintain warning signs for at least four weeks after the period of authorised Strychnine use has expired, or until all traps / untaken baits with Strychnine have been collected.

In the case of ongoing pest management operations using Strychnine, that are carried out on a continuing basis, warning signs must state that Strychnine use occurs on an ongoing basis.

9.10.3 Distance Restrictions

For all strychnine programmes baits and traps must be placed at least:

- 500 metres from a dwelling
- 30 metres from and a minimum of 3 metres above the high water level of permanent of flowing water bodies
- 20 metres from boundary fences
- 20 metres from the edge of formed gazetted public roadways and
- 10 metres from habitat areas.

The Authorising Officer may vary the above distance restrictions provided the variation would not increase the risk to the public or the environment, including non – target species.

As part of their Risk Assessment, Authorising Officers take into account the presence of any gazetted public drinking water source areas (PDWSA). DWER advises that emu baiting with strychnine is not recommended in PDWSA.

9.11 Safety and first aid

For all emergencies or poisoning call 000 and seek medical assistance urgently. Poisons Information Centre – call 13 11 26 (24 hours a day / 7 days a week).

All persons who handle or use Strychnine products, must be thoroughly familiar with the safety directions on the label, and additional information found on the SDS.

It is important to note that there is no effective antidote for strychnine poisoning.

Persons undertaking approved training will receive First Aid and Safety instruction commensurate with the level of risk of exposure.

First Aid instructions are provided on the label of the Strychnine product. Current label instructions in the event of human poisoning are:

For Strychnine

“If swallowed, speed in treatment is essential.

If poisoning occurs, contact a doctor or Poison Information Centre. Phone 13 11 26.

Give patient activated charcoal and keep patient quiet in a dark place if possible. If skin contact occurs, remove contaminated clothing and wash skin thoroughly. If in eyes, hold eyes open, flood with water for at least 15 minutes and see a doctor.”

Any changes to these instructions will be reflected on the Strychnine product label and the Safety Data Sheet (SDS) which is available from licensed retailers and generally also from the manufacturer’s website.

9.12 Labelling and precautions

9.12.1 Labelling

APVMA product approval for registration includes approval of the product label. Products must be stored in their original container with the label intact.

The labelling of field prepared baits must follow the stipulations of the manufacturer of the product used to make the field baits.

9.12.2 Precautions

Strychnine products must not be used in domestic or home garden situations.

Protection of Domestic and Farm Dogs: Domestic and farm dogs must not gain access to Strychnine, contaminated hessian/material, strychnine containing emu baits or poisoned animal carcasses, and may need to be restrained or muzzled for an appropriate length of time.

Protection of Livestock: Where strychnine poisoned grain has been used, domestic stock must be excluded from the baited area until all bait has been consumed, buried, or retrieved. Caution must be exercised when re-introducing livestock to previously baited paddocks unless it is obvious that all bait has either been consumed or has been gathered and removed for destruction.

Protection of Wildlife, Fish, Crustaceans and Environment: Strychnine products must not be handled where there is a risk of contaminating food, animal feed or water supplies.

Other methods of control should not be used during emu baiting programs. Concurrent trapping and shooting interrupt normal animal behaviour and lead to avoidance of baits.

Appendix 1 1080, PAPP and Strychnine Handling and Training Matrix

The Matrix below provides a detailed description of the various combinations of the principal roles involving the approval, supply and use of 1080, PAPP and Strychnine products, and the training requirements of these roles.

The Matrix distinguishes between the provisions of:

- INFORMATION on the safe transport and storage of 1080, PAPP and Strychnine when the 1080, PAPP and Strychnine products are picked up from the licensed retailer and
- TRAINING, different versions of which are required depending on the needs of the role, and the level of risk involved.

An Applicant who is only undertaking that role is the only role that does not have an information or training requirement.

1080, PAPP and Strychnine Handling Role/Training Matrix

Role	Involvement			Role Requirements and Obligations		
	Applicant	Receiver	Approved User	Information	Training	Notifies Neighbours
1	X					
2	X	X		Yes		
3	X	X	X	Yes	Yes	Yes
4		X		Yes		
5		X	X	Yes	Yes	Yes
6			X		Yes	Yes
7	X		X		Yes	Yes

DESCRIPTION OF THE ROLES:

Role 1. This person is the Applicant only. They look after the paperwork, maintain the files and ensure the forms are filled in. They must also ensure they and their employees are fully compliant with the law. This person could be an absentee landowner, or an employee of a mining company or a timber plantation. This person does not require information (beyond that required for him to understand the overall process and the forms they need to complete) or training, as they are not physically involved with the supply, possession or use of the 1080, PAPP and Strychnine.

Role 2. This person is an Applicant, probably because they are a land owner/occupier, and is happy to collect the 1080, PAPP and Strychnine products because it is convenient for them so they are also a Receiver. They will not be using the 1080, PAPP and Strychnine products themselves and will engage a contractor, or direct an employee, to be the Approved User (who will require training). This role requires information from the retailer as they are a Receiver and will be taking the 1080, PAPP and/or Strychnine from the retailer to the land where it will be used.

Role 3. In this case, the Applicant, after a successful application to use 1080, PAPP and/or Strychnine products on their property, collects the 1080, PAPP and/or Strychnine products (as the Receiver) and lays the baits/uses the Strychnine themselves (as the Approved User). This is the typical farmer scenario, and the person requires information at the collection point, and training as an Approved User.

Role 4. This person (the Receiver) is only involved in the collection of the 1080, PAPP and Strychnine product from the retailer. It could be a courier, or perhaps the Applicant's spouse or other relative, or an employee. This person only requires information to be available at the collection point.

Role 5. This person (the Receiver) collects the 1080, PAPP and Strychnine products from a retailer or wholesaler, having been authorised to use the products on a particular property and then uses the products as the Approved User. This person could be an employee of, or an LPMT under contract to, the Applicant. This person requires information at the point of pick up, and training as an Approved User.

[Note: LPMTs receive appropriate training as part of their licence requirements, and do not require any additional training provided they have a current licence appropriately endorsed for the product to be used].

Role 6. This person could be an employee or a LPMT who is not responsible for making the application, or picking the product up. They are an Approved User only and require training (unless they are an LPMT with a current, appropriately endorsed, licence).

Role 7. This person is similar to Role 3, except another person is the Receiver. As this person is an Approved User they require training.

Appendix 2 Protocol for approved pastoral lessees to possess and use 1080 concentrate

Authorisation of Approved Pastoralists

Eligibility for approval is restricted to persons who are:

- Resident on properties in pastoral zones, as constituted under Section 13 of the Agriculture and Related Resources Protection Act 1976, and
- Have completed the required DPIRD landholder training, and
- Able to provide evidence that they are nationally accredited in the following competencies after completing training approved by the DG, DOH:
 - AHCCHM303A - Prepare and apply chemicals, and
 - AHCCHM304A - Transport, handle and store chemicals

Conditions of supply

Approved Pastoralists will be supplied 1080 CLC only in accordance with a valid Permit issued by an Authorising Officer.

Conditions of possession

1. Approved Pastoralists must store the 1080 CLC in the original containers under double lock when not required for immediate use.
2. When transporting 1080 CLC from an S7 retailer to the storage property or to another property for use, Approved Pastoralists must keep the 1080 CLC in the original containers and in a secured, locked box or container.
3. Accurate records of 1080CLC use must be kept, and may be subject to audit.

Conditions of use

1. 1080 CLC must only be used:
 - By the Approved Pastoralist and cannot be passed to, or used by, any other person.
 - For producing wild dog or fox baits on the property identified in the corresponding Risk Assessment (undertaken by an Authorised officer of DPIRD).
 - For producing wild dog and fox baits in accordance with the Section 72 Notice, this Code, label requirements and Directions for Use documentation.
2. The use of 1080 CLC by Approved Pastoralists is restricted to properties in pastoral zones. The pastoral zone is Crown land lease granted for pastoral purposes as defined under Section 93 of the Land Administration Act 1997.

Audit

Approved Pastoralists must make their storage premises and associated records and other documentation, relating to the supply, possession and use of 1080 CLC, available to random audit by officers of the Department of Primary Industries and Regional Development or Department of Health as required.

Appendix 3 Local government areas where strychnine can be used on traps

Schedule 1 – Pastoral areas

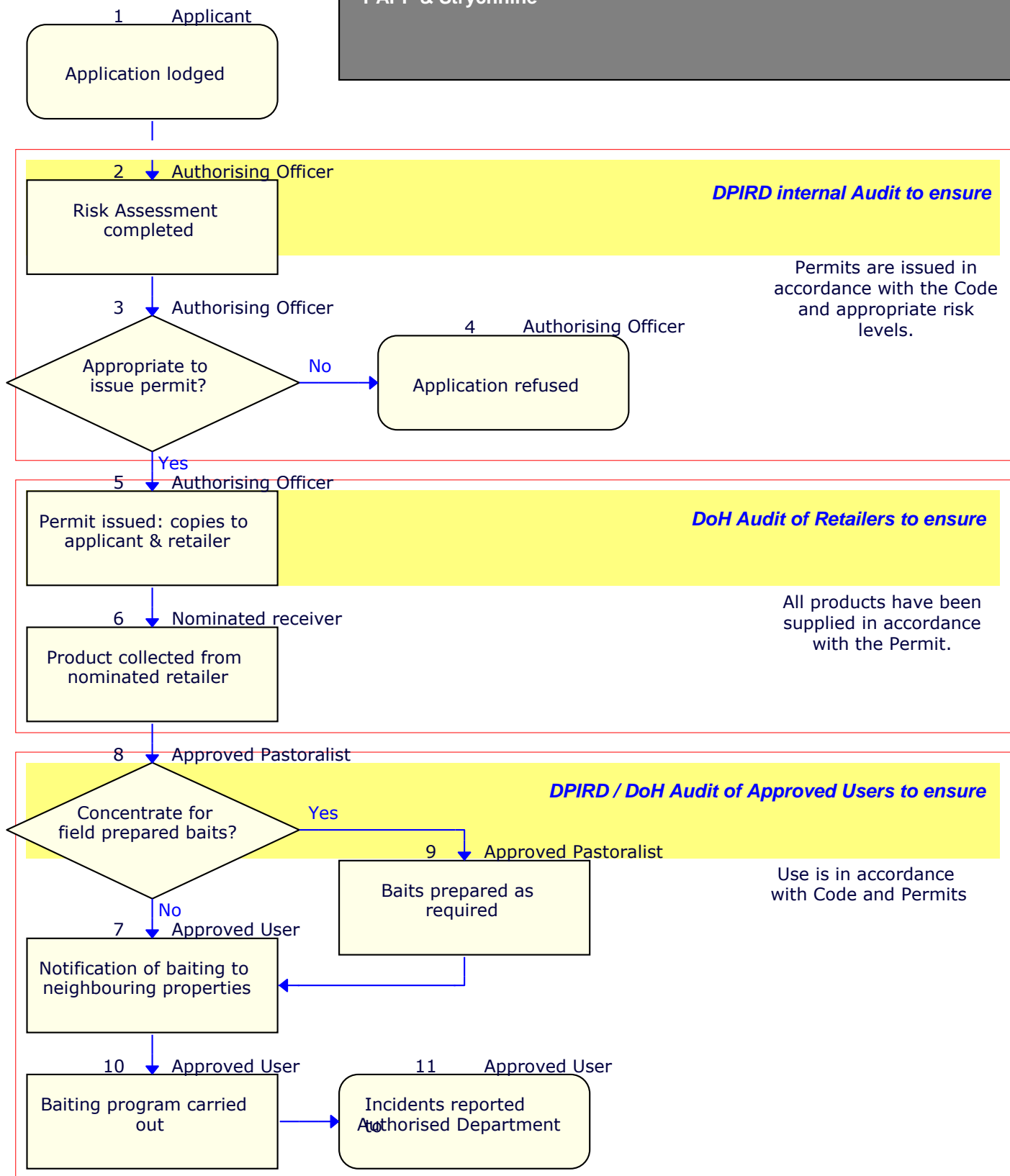
Ashburton
Broome
Carnarvon
Coolgardie
Cue
Derby – West Kimberley
Dundas
East Pilbara
Exmouth
Halls Creek
Kalgoorlie-Boulder
Laverton
Leonora
Meekatharra
Menzies
Mt Magnet
Murchison
Ngaanyatjarraku
Port Hedland
Roebourne
Sandstone
Shark Bay
Upper Gasgoyne
Wiluna
Wyndham-East Kimberley
Yalgoo

Schedule 2 – Agricultural areas

Chapman Valley
Dalwallinu
Esperance
Kondinin
Koorda
Kulin
Lake Grace
Merredin
Mingenew
Moora
Morawa
Mt Marshall
Mukinbudin
Narembeen
Nungarin
Northampton
Perenjori
Ravensthorpe
Three Springs
Trayning
Victoria Plains
Westonia
Wongan-Ballidu
Yilgarn

Appendix 4 Application, approval and audit: Process summary

Summary: Application, Approval, Use and Audit Process for 1080, PAPP & Strychnine



Note: Approved user includes LMPT.