



Code of practice for the safe use and management of Strychnine in Western Australia

April 2013

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Instrument of approval

Poisons Act 1964

Poisons (section 24) (registered pesticide strychnine alkaloid) Notice 2004

Code of Practice for the safe use and management of strychnine in Western Australia – April 2013

I, Dr. Revle Bangor-Jones, delegate of the Director General* of the Department of Health, am satisfied that the content of the April 2013 version of the 'Code of Practice for the Safe Use and Management of Strychnine in Western Australia' (the Code) meets all requirements of the *Poisons (Section 24) (Registered Pesticide Strychnine Alkaloid) Notice 2010* and subsequent amendments.

The April 2013 version of the Code is the version agreed to by the Departments of Health, and Agriculture and Food, and replaces the April 2009 version of the Code, and all subsequent drafts made in the development of the April 2013 version.

Signed:



Dr. Revle Bangor-Jones, Delegate of the Director General* of the Department of Health

16 April 2013

*Previously referred to as the Commissioner, or Chief Executive Officer

Definitions

Applicant	A landowner/occupier, Agent, Authorised Officer or Authorised Person, who applies to an Authorising Officer for a Permit for the possession and use of Strychnine by an Approved User.
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 strychnine on a specified property.
Approved User	A person identified on a Permit as one who will possess and use strychnine on a specified area of land.
APVMA	Australian Pesticides and Veterinary Medicines Authority
Authorised Department	Department of Agriculture and Food (DAFWA)
Authorising Officer	An officer who is trained to assess Applications and issue Permits on behalf of an Authorised Department, namely: <ul style="list-style-type: none">• DG, DAFWA (Authorising Officer of DAFWA)• Officer of DAFWA authorised by the DG, DAFWA to assess applications and authorise as appropriate.• Employee of a local government district specified in Appendix A and in which no DAFWA employee is located and who is authorised by the DG, DAFWA to assess applications and authorise as appropriate.• DG, DOH (An officer of DAFWA who is an Authorising Officer is usually also an Authorised Officer.)

Authorised Officer	An officer of DAFWA who has been authorised by the DG of DAFWA to be sold or supplied with, and possess and use Strychnine.
Basic Training Course DAFWA	Strychnine training course approved by the DG, DOH. Department of Agriculture and Food Western Australia
DG	Director General
DOH	Department of Health
Incident	An event involving strychnine which may be a breach of the Section 24 Notice or this Code of Practice.
Incident Investigation Coordinator	Officer of DAFWA designated as such.
LD ₅₀	Lethal Dose, 50 % (median lethal dose)
Licensed Pest Management Technician (LPMT)	A pest management technician licensed under the Health (Pesticides) Regulations 2011, whose licence is endorsed to possess and use Strychnine.
Licensed Manufacturer	An entity licensed under the Poisons Act 1964 to manufacture Strychnine products.
Licensed Retailer	An entity licensed under the Poisons Act 1964 to sell or supply Strychnine by retail sale.
Licensed Wholesaler	An entity licensed under the Poisons Act 1964 to sell or supply Strychnine by wholesale sale.
Nominated Retailer	The licensed Retailer nominated by the Applicant to supply strychnine in accordance with a Permit.
Prescribed Pests	The pest species that strychnine is registered to control.
Permit	A written approval, issued by an Authorising Officer, to possess and use prescribed quantities of strychnine on a specified property.

Pest Management Business	A pesticide firm which employs or engages a licensed Pest Management Technician.
Risk Assessment	The formal process used by an Authorising Officer to assess whether to approve the use of strychnine in accordance with the Application.
Section 24 Notice	Poisons (Section 24) (Registered Pesticide Strychnine Alkaloid) Notice 2004
Strychnine	A highly toxic alkaloid produced by some plants. Also a manufactured product containing strychnine that is registered with the APVMA

Introduction

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 to avoid over-reliance on any one method that may otherwise result in a decrease in its effectiveness over time.

There are limited practical options for controlling emus and wild dogs. Options for emus are largely restricted to shooting, and baiting with Strychnine. Exclusion fencing has limited success. With wild dogs, control options can include baiting with 1080, shooting, trapping, den destruction or, possibly in the future, naturally spread, target specific, sterility agents.

Alternative control options may be required when Strychnine cannot be used safely, for example, when its use would endanger public health, domestic pets or wildlife.

The pest control method selected will depend on a number of factors and it is important that the advantages and disadvantages of all methods are considered before deciding on a management strategy.

What is Strychnine?

Strychnine is a plant-sourced toxin discovered in 1818 by French chemists. It is manufactured from the dried ripe seeds of *Strychnos nux-vomica*, an ever-green tree found in South-east Asia (e.g. India, Sri Lanka, and Vietnam). Other species of this genus also occur in parts of Australia.

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 3-20 minutes. Most vertebrates are highly sensitive to Strychnine with acute LD₅₀s 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.

Why use Strychnine?

The use of Strychnine in Western Australia is restricted to only two uses:

- Wild dog control, by adding it to the jaws of traps to maximise the animal welfare of these traps, and
- Emu control programs, because of the emu's very high tolerance to 1080 (see below), and susceptibility to Strychnine.

Wild dog control

The use of Strychnine for wild dog control ensures that trapped dogs die quickly, and this use is restricted to:

- Pastoral areas as listed in Appendix A – Schedule 1,
- Adjacent agricultural areas as listed in Appendix A – Schedule 2, and
- Other locations approved by Authorising Officers of the Department of Agriculture and Food (DAFWA).

In all areas described above, a risk assessment of the proposed Strychnine use must be conducted by an Authorising Officer of or for DAFWA 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.

Supply of Strychnine will be restricted to prevent stock-piling and will only be authorised when the landholder can legitimately justify to the Authorising Officer that the quantity being sought is appropriate and will be all used within the stipulated period.

Any remaining Strychnine, the container and used hessian, must be destroyed according to Section 8 of this Code of Practice.

Emu control programs

Strychnine can also be used for Emu control during periods of high Emu population pressure and /or impacts on farming enterprises. This use of Strychnine is **subject to the applicant obtaining a damage licence from the Department of Environment and Conservation (DEC)**. Only Authorised Officers and LPMTs are able to prepare and lay Strychnine-treated grain bait 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.

Guidelines

Information on how registered Strychnine products should be used is provided in the following Farmnotes produced by DAFWA:

- Farmnote 383 (October 2009), “Guide to the safe use of Strychnine for jawed traps”,
- Farmnote 382 (October 2009). “Guide to the safe use of Strychnine for Emu control”

In addition, DAFWA produces booklets which contain landholder information on the safe use of Strychnine for wild dog and emu control respectively.

Copies of the Farmnotes are provided when training is undertaken and also with the application form. They may also be found on the DAFWA website: www.agric.wa.gov.au

Enquiries

All enquiries regarding this Code should be directed to either the Director General of DAFWA, or the Chief Pharmacist of the DOH.

Legislative control of strychnine

The *Poisons Act 1964* and *Poisons Regulations 1965* are the primary legislation that regulate the sale, use and possession of Strychnine in Western Australia. The inclusion of Strychnine in Schedule 7 of the *Poisons Act 1964* means that its supply, possession and use are restricted. The *Health (Pesticides) Regulations 2011* also contain general restrictions on the use of pesticides.

The *Poisons (Section 24) (Registered Pesticide Strychnine Alkaloid) Notice 2004* (and subsequent amendments) (the Section 24 Notice) imposes conditions and restrictions on the sale, supply, possession and use of Strychnine 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 Strychnine from either the Director General, Department Health (DG, DOH) or the Director General of DAFWA (DG, DAFWA).

The *Dangerous Goods Safety Act 2004* provides general regulation of Strychnine storage, handling and transportation.

The *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* regulates some of the storage requirements for Strychnine.

The *Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007* regulates transport of Strychnine.

Requirements for containers and labelling are found in the *Agricultural and Veterinary Chemicals Code Act 1994 (Commonwealth)* and the *Poisons Standard 2008*.

Legal status and scope of the code of practice

This Code may be cited as the *Code of Practice for the Safe Use and Management of Strychnine in Western Australia* (the Code).

The Code sets out the rules and guidelines for the safe management and use of Strychnine. It serves to:

- Implement the Section 24 Notice, and,
- Elaborate on the procedures that are required for the safe supply, transport, storage, and use of Strychnine.

The Code applies to:

- All manufactured Strychnine products, and
- Field-prepared traps and baits containing Strychnine.

The Code does not apply to:

- Any pesticide other than Strychnine, and/or
- Outside the State of Western Australia.

A breach of the Code may be a breach of the underpinning legislation which may constitute an offence. Successful prosecution may lead to imprisonment and / or the requirement to pay a fine.

Where an Approved User is in breach of any part of this Code, they may:

- Be required to undertake further training,
- Lose their Permit to use strychnine, and /or
- Be prosecuted.

Sale or supply of strychnine

Sale or supply of Strychnine by wholesale

Licensed Manufacturers and wholesalers must maintain readily accessible and auditable records of all strychnine product transactions as per section 13.1 of the Code, and may only supply the following entities on provision of the appropriate proof of authority:

Occupational entities	Proof of authority
Other licensed manufacturers	Proof of licence
Licensed wholesalers	Proof of licence
Licensed retailers	Proof of licence
Authorised officers	Instrument of authority
Authorised persons	Instrument of authority
Registered pest management businesses who employ LPMTs with a strychnine endorsement	Proof of registration

Sale or supply of Strychnine by retail

Licensed Retailers must maintain readily accessible and auditable records of all strychnine product transactions as per section 13.1 of the Code, and may only supply the following entities on provision of the appropriate proof of authority:

Occupational entities	Proof of authority
Other licensed retailers	Proof of licence
A receiver nominated on a current permit	Current permit
Approved users nominated on a current Permit	Current permit
Authorised officers	Instrument of authority
Authorised persons	Instrument of authority
Registered pest management businesses	Proof of registration
Licensed pest management technicians	Proof of endorsement on permit

Application and permit

Uses that can be approved

The only uses that can be approved for strychnine are wild dog trapping and emu baiting, and for research purposes subject to compliance with the Section 24 Notice, this Code, label directions, a Minor Use Permit issued by the APVMA, and any instructions given, or conditions imposed, by an Authorising Officer in a particular case.

The use of strychnine for wild dog trapping can only be carried out by:

- Approved Users,
- Authorised Officers,
- LPMTs and
- Persons approved by the DG DOH.

The use of strychnine baits for emu control can only be carried out by:

- Authorised Officers,
- LPMTs and
- Persons approved by the DG DOH.

Categories of applicants

The following persons may be applicants:

- A landowner/occupier,
- An agent,
- Other persons who apply to the DG, DAFWA
- Authorised Officers
- A person who applies to the DG, DOH, and
- A Licensed Pest Management Technician

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.

The Applicant must apply for a Permit to use strychnine on a specified property during one or more specified periods, on the prescribed form, which must specify the purpose for the strychnine, and must identify by name and address the Receiver(s) and the Approved User(s). The Applicant may also be the Receiver and the Approved User (see Appendix B for more information). An application may identify up to 5 persons to be Receivers and Approved Users. These can all be nominated at one time.

A Permit to use Strychnine can only be given by an Authorising Officer.

An Authorising Officer who is an employee of a local government authority of a district specified in Appendix A can only authorise the sale, supply, possession and use of Strychnine in respect to persons who reside in that local government district and for use in that local government district.

When an Application is received, the Authorising Officer must conduct a Risk Assessment in accordance with section 7 of this Code.

If the Application is approved, the Authorising Officer must issue a Permit containing the information outlined below, and be satisfied that the Applicant is aware of any special conditions included in the Permit.

If the Application is not approved, the Authorising Officer must advise the Applicant as soon as possible, with his reasons for rejecting the Application. The Applicant may lodge an appeal to the DG DOH, whose decision is final.

An Applicant may receive extended approval to conduct strychnine trapping or baiting programs on a specified property. In such cases, the Applicant must make written application to the Authorising Officer for a Permit to cover the ongoing supply of strychnine.

An Authorising Officer may revoke the Permit, or impose additional conditions at any time by written notice to the Approved User.

The Permit

The Permit, which carries a unique number referenced back to the respective Application, must identify by name and address:

- The Applicant,
- The Approved User or Authorised Officer,
- The Authorising Officer,
- The nominated Retailer who will supply strychnine in accordance with the Permit,
- The Receiver. (If this is not the applicant, then he/she must be authorised to possess Strychnine, and be nominated in the Application),
- The location of the area to be baited,
- The period during which approval for the use of the Strychnine has been granted,
- The quantity of Strychnine that can be supplied, 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.

Training

All persons in possession of Strychnine must receive training (or information) required by their role and commensurate with the level of risk.

Authorising Officers, Authorised Officers, Authorised Persons and Incident Investigation Coordinators.

These persons must successfully complete a course approved by the DG, DOH and delivered by an accredited trainer (The Basic Training Course). Training must be undertaken regularly to maintain competency. The Basic Training Course must include the following topics:

- Legislative requirements for the supply, possession, storage and use of Strychnine in WA,
- Requirements for an Application, the procedures necessary and notification required to carry out a baiting or trapping program,
- The key factors required to use Strychnine in a safe and compliant manner;
- Risk Assessment training,
- Ability to identify signs of poisoning and provide appropriate First Aid treatment,
- Requirements for the safe storage and transportation of Strychnine,
- Requirements for record keeping and notification of accidents and incidents, and
- Basic investigation techniques.

Approved Users

Approved Users must be given adequate written instruction in the safe and effective use of Strychnine by an Authorised Officer before the Permit is issued. Commensurate with the level of risk, the completion of a verbal or written questionnaire may be required. In addition, practical field instructions may be required.

Licensed Pest Management Technicians

Licensed Pest Management Technicians must hold a current pesticides licence endorsed for the control of prescribed pests after completing a course approved by the DG, DOH.

Manufacturers and wholesalers

A person licensed under the *Poisons Act 1964* to manufacture Strychnine must be appropriately qualified to handle poisons. The person responsible for supervising the manufacture of Strychnine must:

- Have a minimum of 5 years appropriate experience with similar poisons,
- Be aware of the dangers associated with exposure to Strychnine , and
- Have a thorough knowledge and understanding of appropriate First Aid and Safety and emergency procedures.

Retailers

While no specific training requirements are imposed on retailers that supply Strychnine, employers and employees of retail outlets should be aware of the dangers associated with Strychnine and the restrictions imposed on the supply of Strychnine set out in the Section 24 Notice.

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 Material Safety Data Sheet and manifest must accompany the transport of Strychnine.

Risk assessment

The type, volume and precise placement of Strychnine to be used must be specified in the Application so that any inherent risk presented by variations in these factors can be assessed.

In the case of very large landholdings, where the movement of the 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 baiting application form. The map must indicate the location of:

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

An assessment of the risks associated with Strychnine use must be undertaken by an Authorising Officer before approval is issued to use Strychnine on any parcel of land.

The Risk Assessment must take into account (amongst other things) the;

- location,
- land use,
- proximity and risk to native and domestic non-target species
- protection of human health and safety, and
- protection of the environment.

The Authorising Officer will use the completed Risk Assessment to assign the Application to one of the following risk categories:

- **Manageable Risk (M):** Any area or situation where Strychnine can be used in accordance with the directions for use on the label with minimal risk, or 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 baiting 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 that a Permit is valid for a period of up to five years, providing the circumstances that prevailed when the last Risk Assessment was undertaken, remain unchanged. Examples of factors to be considered include change in ownership or occupancy of the property, or a change to the land use or structure of the property.

Clean up after strychnine use and disposal of wastes

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 skin must not be removed from animal carcasses nor the animal carcass used for human consumption or pet food.

Disposal of unused Strychnine bait

At the conclusion of the approved baiting period, all unused and unconsumed baits must be disposed of by complete incineration (except when local fire bans are in place) and burial, on the same property where baiting was carried out, at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course.

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

Unused baits in the possession of the Approved User at the end of the approved baiting period must be disposed of in accordance with 8.2.1 above, unless the baiting period has been extended by the Authorising Officer, or the Approved User has approval to store baits.

Disposal of used containers and associated trapping and baiting materials

Used Strychnine product containers and impregnated hessian must be disposed of by:

- Burning the items and burying the remains at least 0.5 metre below natural ground level in a dry site at least 10 metres from a water course.
- Disposal is also permitted at a gazetted land-fill site with the approval and supervision of the relevant local government authority.

Notification, warning signs and distance restrictions

Notification

Before Strychnine can be used, the Approved User must notify the occupiers of:

- Any properties adjoining the land on which Strychnine is to be used, and
 - Any other property deemed appropriate by the Authorising Officer,
- at least 3 days but not more than 14 days, before Strychnine use commences.

The notification must provide the following information:

- The intention to use Strychnine products,
- The period of traps and/or baits being presented ,
- The hazards associated with the use of Strychnine, and
- The risks to human health if poisoned animals are handled or consumed.

If the start of emu-baiting is delayed and the baiting will extend beyond the cessation date given in the notice, another 3 days notice of intent to lay baits is required to be given for the extension.

An exemption may be granted from the requirement to notify occupiers of adjacent properties in the case of targeted control 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 that the Approved User makes a signed statutory declaration that the approved user has spoken with the owners or occupiers of properties contiguous with the land to be controlled.

Records of all notifications should be kept by the Approved User for at least 2 years in the event that adverse incidents occur and proof of notification is required.

Warning signs

Before Strychnine can be used on a property, the Approved User/Authorised Officer must erect prominent warning signs at entrances and strategic points on the property, alerting the public that Strychnine is being used. Warning signs must comply with the Strychnine label specifications and must include:

- The date that Strychnine baits or traps were laid,
- The contact numbers of 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,

or as 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 untaken Strychnine material or bait has been retrieved (where practicable).

Distance restrictions

For all Strychnine programs, Strychnine 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 or flowing water bodies,
- 20 metres from boundary fences,
- 20 metres from the edge of formed/gazetted public roadways, and
- 10 metres from habitat areas,

or as directed by the Authorising Officer.

The Authorising Officer may vary the above distance restrictions provided that they are within the limits imposed by the Dog Act 1976, and would not increase the risk to the public or the environment, including non-target species.

Safety and first aid

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

Persons undertaking the Basic Training Course or similar will receive First Aid and Safety instruction commensurate with the level of risk of exposure.

First Aid instructions are provided on the Strychnine label. Current label instructions are:

- If poisoning occurs, contact a doctor or Poisons Information Centre on **131126**.
- Give patient activated charcoal and keep patient quiet in a dark place if possible.
- 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 label.

Labelling, precautions, storage and transport

Labelling

Before Strychnine can be used as a vertebrate pesticide it must be registered by, or subject to a minor use permit from, the APVMA, and appropriately labelled.

Labelling of registered Strychnine products must comply with national and state statutory requirements. Under the *Poisons Act 1964* all products that contain Strychnine are included in Schedule 7 and require special precautions in manufacturing, handling, storage or use.

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

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, impregnated hessian, or poisoned animal carcasses, and may need to be restrained or muzzled for an appropriate length of time.

Protection of Livestock

Domestic stock must be excluded from the baited area until all bait has been consumed, buried, or (where practicable) retrieved. Exercise caution when re-introducing livestock to previously baited paddocks unless it is obvious that all bait has been either consumed or (where practicable) gathered and removed for destruction.

Other methods of control are prohibited

Trapping or shooting emus must not occur on properties while emu-baiting campaigns are taking place.

Protection of wildlife, fish, crustaceans and environment

Strychnine must not be handled where there is a risk of contaminating food, animal feed or water supplies.

Storage

Storage of Strychnine must comply with all requirements of the:

- *Poisons Act 1964*,
- *Poisons Regulations 1965*,
- *Health (Pesticides) Regulations 2011 Poisons Standard 2008*,
- *Dangerous Goods Safety Act 2004*, and
- *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*, as appropriate.

When Strychnine is not required for immediate use, it must be kept dry and in its original labelled container in a locked premises inside a metal cabinet (chemical safe - a firearm safe meets these specifications) at all times. The chemical safe must be fastened to a concrete floor

(not slabs) and/or attached to the wall of the premises and labelled with the word 'Poison'. Appropriate signage **must** be displayed on the premises adjacent to the main entry indicating hazardous chemicals are being stored onsite and restricting access to authorized persons.

Unless approved by an Authorising Officer, Approved Users must not store Strychnine products after a baiting campaign has ended, as stated on the Permit.

Transport

Transportation of commercial quantities of Strychnine is restricted to couriers, common carriers, and other persons authorised by the DG, DAFWA. The transport of Strychnine must comply with the:

- *Dangerous Goods Safety Act 2004,*
- *Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007,*
- *Health (Pesticides) Regulations 2011,* and
- Guidance Notes for transportation of dangerous goods that are produced by the Department of Consumer and Employment Protection.

A Material Safety Data Sheet (MSDS) and manifest must be supplied by the retailer, and accompany the transport of Strychnine. Strychnine products must be transported so that people, food, or animals cannot be contaminated.

Accident and incident reporting

Investigation policy

All accidents or incidents involving Strychnine that contravene, or have the potential to contravene:

- The Section 24 Notice,
- The Health (Pesticides) Regulations 2011, or
- This Code,

must be immediately reported to DAFWA who will initially investigate them according to the Incident Investigation Protocol (see 12.4.below) and submit a report to the DG, DOH.

Incident investigation coordinators

The DG, DAFWA 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. Incident Investigation Coordinators must:

- Have successfully completed the Basic Training Course which includes basic instruction in investigation protocols, and
- Where possible, not be involved in the Risk Assessment of, or the issuing of Permits for baiting / trapping Applications.

Classification of an 'incident'

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 information about the adverse incident is withheld,
 - More than one similar incident occurs in the same locality and close together in time,
 - 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 Strychnine products, or
 - Loss or theft of Strychnine.
- 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 as a result of exposure to Strychnine.

Incident investigation protocol

INCIDENT REPORTED TO DAFWA



HUMAN SAFETY AT RISK,
LOSS OR THEFT OF STRYCHNINE PRODUCTS

- Police and the Chief Pharmacist, DOH, to be notified immediately
- Investigation determined in consultation with the Police and DOH

HUMAN SAFETY NOT AT RISK

- Incident Investigation Coordinator of DAFWA to be advised.
- Incident Investigation Coordinator to allocate an appropriate officer to inquire into the incident and complete an incident evaluation checklist.
- Investigation of the incident and completion of the incident investigation checklist by the appropriate officer is to be completed within 10 working days of the receipt of the incident report.
- Incident Investigation Coordinator to receive the incident investigation checklist, ensure it is complete and determine whether it is likely there was a breach of the Section 24 Notice, the Health (Pesticides) Regulations or this Code.
- Incident Investigation Coordinator to determine if incident is serious or not serious:
 - Serious incidents to be discussed with DOH, and may require further investigation. DAFWA may initiate a response, depending on cause.
 - Non-serious incidents: DAFWA may initiate an appropriate response, depending on cause.
- Report on all incidents (serious and non-serious) and responses made to be forwarded to the Chief Pharmacist of the DOH within 12 working days of the receipt of the incident being notified

Agency Roles in incident investigation and response

Role of the Department of Health

- Independently investigate incidents reported by the DAFWA, if required,
- Investigate, independently or in conjunction with the Police, any adverse human involvement in an incident involving Strychnine,
- Receive and assess all incident reports forwarded from the DAFWA,
- Initiate prosecutions if appropriate,
- Review annual reports and audits provided by the DAFWA, as required,

- Meet annually with the DAFWA to review the effectiveness of the Code and safety of the use of Strychnine, and
- Advise the DAFWA of any investigations and outcomes of breaches of Strychnine usage.

Role of the Department of Agriculture and Food

- Ensure that all 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 officers have the skills to evaluate a Strychnine incident,
- Investigate incident reports according to the protocol above,
- Impose administrative sanctions (verbal or written caution, exclusion from access to Strychnine products etc) as appropriate to the severity of the incident, or as recommended by the DG, DOH,
- Retrain relevant people if appropriate,
- Prepare an annual report for the DOH on all aspects of the department's activities with Strychnine,
- Conduct annual internal audits to check processes are being followed, and
- Meet annually with the DOH to review effectiveness of the Code and safety of the use of Strychnine.

Other incident reporting requirements

Licensed Manufacturers/wholesalers, Licensed Retailers, couriers and Licensed Pesticide Operators must report all incidents involving Strychnine directly to the Chief Pharmacist, DOH.

Approved Users and Authorised Officers must report incidents involving Strychnine to the Authorising Officer who approved the use of the Strychnine.

Requirements for record keeping

Record keeping policy

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

- Include all Strychnine product,
- Include details of receipt from, and consignment to, Approved Users and Authorised Officers,
- Include a register of all Strychnine stored, and
- Be kept for a minimum of two years from the date of supply.

The DAFWA may have additional internal requirements for their staff.

Department of Agriculture and Food

Baiting / trapping applications

A central recording system must be maintained which records the Baiting / Trapping Applications, including:

- The purpose of the baiting/trapping program,
- Its timing, and location,
- The type and volume of Strychnine product, and
- The names and address of Applicant.

Baiting / trapping approvals and permits

In addition to the above, the recording system must record details of:

- The number, type and concentration of Strychnine approved,
- Details of the Risk Assessment and the conditions imposed on the Baiting / Trapping Application,
- The names and address of Approved User, and
- The unique identification number on the Permit, and
- Ensure that a copy of the Permit is retained.

Issue and receipt documentation

Records to show transfer between authorised people, which are to contain the approval identification number, must be retained for all transactions of Strychnine and be signed by the issuer and receiver.

Audits

The DAFWA must undertake quality assurance and internal audits at a minimum rate of at least 3% annually for compliance with the:

- *Poisons Act 1964*,
- *Health (Pesticides) Regulations 2011*,
- Section 24 Notice, and

- Their internal policies and procedures.

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

Poisoning of non-target animals

The DAFWA must retain records of all reported poisoning incidents involving non-target animals that may have resulted from a baiting programme.

Human poisoning

The DAFWA must retain records of all suspected human poisoning incidents resulting from an approved Strychnine baiting program including a copy of reports made to the Police and DOH.

Department of Health

Compliance audits

To ensure the provisions of the *Poisons Act 1964*, *Health (Pesticides) Regulations 2011* and this Code are being met by Licensed Manufacturers, Licensed Retailers and Licensed Pesticide Operators, compliance audits must be undertaken on a regular basis and records maintained.

Accidents involving personal injury - records of all accidents resulting in personal injury as reported to the DOH must be retained.

Manufacturing, wholesale and retail licence holders

Manufacturing, wholesale and retail license holders who supply Strychnine must keep records according to the requirements for Schedule 7 poisons under the *Poisons Regulations 1965*.

Review and update process

The DOH or DAFWA may initiate a review of, or an amendment to, the Code at any time.

Appendix A

Schedule of local government areas where Strychnine can be used on trap jaws

Schedule 1: pastoral areas	Schedule 2: agricultural areas
Ashburton Broome Carnarvon Wiluna Shark Bay Wyndham – E/ Kimberley Coolgardie Derby-West Kimberley East Pilbara Exmouth Mt.Magnet Halls Creek Leonora Roebourne Meekatharra Kalgoorlie-Boulder Dundas Cue Laverton Menzies Murchison Ngaanyatjarruka Port Hedland Sandstone Upper Gascoyne Yalgoo	Chapman Valley Dalwallinu Esperance Kondinin Koorda Kulin Lake Grace Morawa Mt.Marshall Mukinbudin Mullewa Narembeen Northampton Perenjori Ravensthorpe Westonia Yilgarn

Appendix B

Strychnine handling role/training matrix

Rationale

The matrix below provides a detailed description of the various combinations of the principal roles involving the approval, supply and use of Strychnine, and the training requirements of those roles. It supplements the changes to Section 5.1 of the Code, and should be used generically, based on the actual ROLE, irrespective of the occupation of the person.

The matrix distinguishes between the provisions of:

- INFORMATION on the safe transport and storage of Strychnine, when the Strychnine is picked up at the retailer and,
- TRAINING, different versions of which are required depending on the needs of the role, and the level of risk.

The Applicant role is the only one that does not have an information or training requirement.

Please note: In the description that follows, a reference to the male gender include the female gender.

1080 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 (1-7 in the table above)

1. This person is the Applicant only. He looks after the paperwork, maintains the files and ensures that the forms are filled in and that he and/or his employer are fully compliant with the law. He could be an absentee landowner, or an employee of a Pastoral company or Mining company. This person does not require information (beyond that required for him to understand the overall process and the forms he needs to complete) or training, as he is not involved with the supply, possession or use of the Strychnine.

2. This person is an Applicant, probably because he is a land owner/occupier, and is happy to pick up the Strychnine product because it is convenient for him to do so. He is not interested in using the Strychnine product and may engage a contractor, or direct an employee, to be the Approved User, who requires training. The Applicant requires information from the retailer as he is also the Receiver.

3. In this case, the Applicant, after a successful application to use Strychnine on his property, picks up the Strychnine product and lays the traps himself. This is the typical Pastoralist/farmer scenario, and the person requires information at the point of pick up, and training as an Approved User.

4. This person (the Receiver) is only involved in the pickup of the 1080 product from the retailer. It could be a courier, or perhaps the Applicant's wife or other relative, or an employee. This person requires information on the hazards of handling Strychnine (including safe transport and storage), to be available at the collection point.

5. This person (the Receiver) picks up the Strychnine product from a retailer or wholesaler, having been authorised to use the products on a particular property and uses them 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 a high level of 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].

6. This person could be an employee or a LPMT who is not responsible for making the application, or picking the product up. He has been approved as the Approved User only and requires training (unless he is an LPMT with a current, appropriately endorsed, licence).

7. This person is similar to situation No.3, except that another person picks up the bait, and requires information to be provided at the point of pickup. The person is the Applicant and the Approved User, the latter role requiring training.

Notifying neighbours

Section 8 (2) of the Section 24 notice clearly says that it is the person who proposes to use it (the strychnine product), is to notify the adjoining neighbours of the intention to lay Strychnine bait or traps. The Table shows that it is the Approved User who has this responsibility.

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