



Department of **Health**

Department of **Agriculture and Food**

**CODE OF PRACTICE
FOR THE SAFE USE AND MANAGEMENT
OF STRYCHNINE IN WESTERN AUSTRALIA**

APRIL 2009

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 2009.**

INSTRUMENT OF APPROVAL

I, Dr. Margaret Stevens, delegate of the Chief Executive Officer* of the Department of Health, am satisfied that the content of the April 2009 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 2004* and subsequent amendments.

The April 2009 version of the Code is the version agreed to by the Departments of Health, and Agriculture and Food, and replaces the October 2001 version of the Code, and any other versions created during the development of the April 2009 version.

Signed:

Dr. Margaret Stevens, Delegate of the Director General* of the Department of Health.

Dated:

***Previously referred to as the Commissioner for Health.**

Contents

INSTRUMENT OF APPROVAL	1
DEFINITIONS.....	4
1. INTRODUCTION	6
1.1. INTEGRATED PEST MANAGEMENT	6
1.2. WHAT IS STRYCHNINE?	6
1.3. WHY USE STRYCHNINE?	6
1.4. GUIDELINES	7
1.5. ENQUIRIES	7
2. LEGISLATIVE CONTROL OF STRYCHNINE.....	8
3. LEGAL STATUS AND SCOPE OF THE CODE OF PRACTICE	9
4. SALE AND SUPPLY OF STRYCHNINE.....	10
4.1. SALE OR SUPPLY OF STRYCHNINE BY WHOLESALE (PROOF OF LICENCE REQUIRED).....	10
4.2. SALE OR SUPPLY OF STRYCHNINE BY RETAIL (AUTHORISATION VOUCHER REQUIRED).....	10
5. APPROVAL AND USE OF STRYCHNINE.....	11
5.1. REQUIREMENTS FOR APPROVAL TO USE STRYCHNINE.....	11
5.2. USES/USERS THAT CAN BE APPROVED.....	11
5.3. USE OF STRYCHNINE	12
5.4. PROHIBITION ON OTHER METHODS OF CONTROL	12
6. TRAINING.....	13
6.1. AUTHORISED OFFICERS:	13
6.2. AUTHORISING OFFICERS FROM DAFWA (WHO UNDERTAKE RISK ASSESSMENTS).....	13
6.3. INCIDENT INVESTIGATION COORDINATORS	13
6.4. APPROVED USERS	13
6.5. LICENSED PESTICIDE OPERATORS.....	13
6.6. MANUFACTURERS AND WHOLESALERS.....	13
6.7. RETAILERS.....	14
6.8. COURIERS AND CARRIERS	14
7. RISK ASSESSMENT	15
7.1. APPLICATION TO USE STRYCHNINE	15
8. CLEAN UP AFTER STRYCHNINE USE, AND DISPOSAL OF WASTES	16
8.1. DISPOSAL OF ANIMAL CARCASSES.....	16
8.2. DISPOSAL OF UNUSED STRYCHNINE BAIT.....	16
8.3. DISPOSAL OF USED CONTAINERS AND ASSOCIATED TRAPPING AND BAITING MATERIALS.	16
9. NOTIFICATION, WARNING SIGNS AND DISTANCE RESTRICTIONS	17
9.1. NOTIFICATION.....	17
9.2. WARNING SIGNS	17
9.3. DISTANCE RESTRICTIONS	18
10. SAFETY AND FIRST AID.....	19
11. LABELLING, PRECAUTIONS, STORAGE AND TRANSPORT	20
11.1. LABELLING	20
11.2. PRECAUTIONS	20
11.3. STORAGE	20
11.4. TRANSPORT	21
12. ACCIDENT AND INCIDENT REPORTING.....	22
12.1. INVESTIGATION POLICY.....	22

12.2. INCIDENT INVESTIGATION COORDINATORS	22
12.3. CLASSIFICATION OF AN ‘INCIDENT’	22
12.4. INCIDENT INVESTIGATION PROTOCOL	23
12.5. AGENCY ROLES IN INCIDENT INVESTIGATION AND RESPONSE.....	23
12.6. OTHER INCIDENT REPORTING REQUIREMENTS.....	24
13. REQUIREMENTS FOR RECORD KEEPING.....	25
13.1. RECORD KEEPING POLICY	25
13.2. DEPARTMENT OF AGRICULTURE AND FOOD.	25
13.3. DEPARTMENT OF HEALTH.....	26
13.4. MANUFACTURING, WHOLESALE AND RETAIL LICENCE HOLDERS	26
14. REVIEW AND UPDATE PROCESS	27
15. APPENDIX A	28
SCHEDULE OF LOCAL GOVERNMENT AREAS WHERE STRYCHNINE CAN BE USED ON TRAP JAWS	28

DEFINITIONS

Applicant	A landowner/occupier who applies to an Authorising Officer for approval to possess and use Strychnine.
Approved user	A person authorised to possess and use Strychnine by an Authorising Officer.
APVMA	Australian Pesticides and Veterinary Medicines Authority
Authorising Officer	<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 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.
Authorisation Voucher	A voucher given to an Approved User or an Authorised Officer in order to collect strychnine from S7 Retailer
Baiting Application	An Applicant's submission to an Authorising Officer proposing to undertake Strychnine trapping or baiting on a specified parcel of land.
Basic Training Course	Strychnine training course approved by the DG, DOH.
Commercial Pesticide Firm	A pesticide firm which employs or engages a Licensed Pesticide Operator.
DAFWA	Department of Agriculture and Food Western Australia
Dealing with Strychnine	Coming into contact with Strychnine, including the manufacture, possession, supply, transport and use of strychnine products.
Director General (DG)	Equivalent to Chief Executive Officer, DAFWA or Commissioner of DOH
DOH	Department of Health
Incident	An adverse effect associated with the manufacture, storage, supply, transport, use or disposal of Strychnine and any breach or suspected breach of the Section 24 Notice, or this Code.
Incident Coordinator	Investigation Officer of DAFWA designated as such
Licensed Pesticide Operator	A pest management technician licensed under the <i>Health (Pesticides) Regulations 1956</i> , whose licence is endorsed to possess and use Strychnine.
Licensed Manufacturer	An entity licensed under the <i>Poisons Act 1964</i> to manufacture Strychnine.
Licensed Retailer	An entity licensed under the <i>Poisons Act 1964</i> to sell or supply Strychnine by retail sale.
Licensed Wholesaler	An entity licensed under the <i>Poisons Act 1964</i> to sell or supply Strychnine by wholesale sale.

Risk Assessment	A formal assessment of evaluating the risk associated with baiting or trapping an area of land with Strychnine.
Section 24 Notice	<i>Poisons (Section 24) (Registered Pesticide Strychnine Alkaloid) Notice 2004</i>
Strychnine	A highly toxic alkaloid produced by some plants. Also a manufactured product containing Strychnine that is registered with the APVMA
Wild Dogs	Dingoes, wild dogs and their hybrids

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 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.

1.2. 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.

1.3. 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.

1.3.1. 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.

1.3.2. 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 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.

1.4. Guidelines

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

- Farmnote 33/2003, “Guide to the safe use of Strychnine for jawed traps”,
- Farmnote 34/2003. “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

1.5. Enquiries

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

2. LEGISLATIVE CONTROL OF STRYCHNINE.

2.1. The *Poisons Act 1964* and *Poisons Regulations 1965* are the primary legislation that regulates the manufacture, 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 1956* also contain general restrictions on the use of pesticides.

2.2. 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 people 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).

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

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

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

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

3. LEGAL STATUS AND SCOPE OF THE CODE OF PRACTICE

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

3.2. 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.

3.3. The Code applies to:

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

3.4. The Code does not apply:

- To any pesticide other than Strychnine, and
- Outside the State of Western Australia.

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

4. SALE AND SUPPLY OF STRYCHNINE

4.1. Sale or supply of Strychnine by wholesale (proof of licence required)

Licensed Manufacturers and wholesalers must only supply to:

- Licensed Wholesalers,
- Licensed Retailers
- Authorised Officers ,
- Approved Users authorised by the DG, DOH
- Commercial Pesticide Firms, or
- Licensed Pesticide Operators (not for Emu control).

4.2. Sale or supply of Strychnine by retail (Authorisation Voucher required)

4.2.1. Licensed Retailers must only supply to:

- Licensed Retailers
- Approved Users
- Commercial Pesticide Firms, and
- Licensed Pesticide Operators (not for Emu control).

4.2.2. Licences or Authorisation Vouchers must be sighted before Strychnine is provided.

4.2.3. The Authorisation Voucher, which carries a unique number, must identify:

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

5. APPROVAL AND USE OF STRYCHNINE

5.1. Requirements for Approval to use Strychnine

5.1.1. Approval may be given to:

- An Applicant
- Other persons who apply to the DG, DAFWA
- Authorised Officer
- A person who applies to the DG, DOH
- A Licensed Pesticide Operator (not for Emu control)

5.1.2. Any person who applies for approval to use Strychnine must have:

- Applied in the required form, and
- Undertaken training as required

5.1.3. The approval to use Strychnine can only be given by an Authorising Officer. An Authorising Officer may be:

- DG, DAFWA
- Officer of DAFWA authorised by the DG, DAFWA to perform that function
- Employee of a local government district specified in Appendix A and authorised by the DG, DAFWA to perform that function
- DG, DOH

5.1.4. An Authorising Officer who is an employee of a local government 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.

5.1.5. If a Baiting Application is received from an Applicant by an Authorising Officer, the Authorising Officer must conduct a Risk Assessment .

5.1.6. If approval is given, the Authorising Officer must:

- Issue an Authorisation Voucher containing the information outlined at 4.2.3 above,
- Ensure that the Approved User has received training as required, and
- Ensure the person nominated to pick up and transport Strychnine has received training as required.

5.1.7. Any Authorising Officer may revoke, or impose additional conditions on, the approval to use Strychnine, at any time by written notice to the Approved User.

5.1.8. If approval is not given an appeal may be lodged by the Applicant with the DG, DOH, whose decision is final.

5.2 Uses/users that can be approved

5.2.1. The use of Strychnine for Wild Dog trapping can only be carried out by:

- Applicants who apply to an Authorising Officer,
- Authorised Officers,
- Licensed Pesticide Operators, and
- Persons who apply to the DG, DOH.

5.2.2. The use of Strychnine for Emu baiting can only be carried out by:

- Authorised Officers, and
- Persons who apply to the DG, DOH.

5.2.3. The use of Strychnine for research and other purposes can only be carried out by persons who apply to the DG, DOH.

5.3. Use of Strychnine

5.3.1. Use of Strychnine must be in accordance with the Section 24 Notice, the Code, label directions, a Minor Use Permit issued by the APVMA, and any instructions given, or conditions imposed, by an Authorising Officer and for a use that has been authorised.

5.3.2. Where an Approved User or Authorised Officer is in breach of any of the above they may:

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

5.4. Prohibition on other methods of control

Trapping or shooting emus must not occur on properties undergoing Emu-baiting campaigns.

6. TRAINING

All persons in possession of Strychnine must receive training commensurate with the level of risk.

6.1. Authorised Officers:

6.1.1. Authorised Officers must successfully complete a course approved by the DG, DOH and delivered by an accredited trainer (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 for a Baiting Application, the procedures necessary and notification required to carry out a baiting program;
- The key factors required to conduct Strychnine baiting in a safe and compliant manner;
- Risk Assessment training ;
- Ability to identify signs of poisoning and effect appropriate First Aid treatment;
- Requirements for the safe storage and transportation of Strychnine;
- Requirements for record keeping and notification of accidents and incidents;
- Basic investigation techniques

6.1.2. Training must be undertaken regularly to maintain competency.

6.2. Authorising Officers from DAFWA (who undertake Risk Assessments)

- Authorising Officers must complete the Basic Training Course.
- Training must be undertaken regularly to maintain competency, acquire and update and skills needed in Risk Assessment, and investigation of an incident involving Strychnine.

6.3. Incident Investigation Coordinators

Incident investigation coordinators must have successfully completed the Basic Training Course which includes basic instruction in investigation protocols and risk assessment.

6.4. Approved Users

Approved Users must be given:

- Adequate written instruction in the safe and effective use of Strychnine by an Authorised Officer before the Authorisation Voucher is issued.
- Commensurate with the level of risk, the completion of a verbal or written questionnaire may be required.
- Practical field instructions as required.

6.5. Licensed Pesticide Operators

Licensed Pesticide Operators must hold a current pesticides licence endorsed for the control of feral animals after completing a course approved by the DG, DOH, (this does not include the control of Emus).

6.6. 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.

6.7. 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.

6.8. Couriers and Carriers

The person supplying Strychnine to a 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.

7. RISK ASSESSMENT

7.1. Application to use Strychnine

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

7.1.2. In the case of very large landholdings, where the movement of the targeted pest animals cannot be predicted, it is acceptable in the Baiting Application form 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.

7.1.3. 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, and
- Poison warning signs.

Additional requirements may be included with the application form or requested by the Authorising Officer.

7.1.4. 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 consider whether or not the Baiting Application should be approved.

7.1.5. 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:

- **Minimal Risk:** Any area or situation where Strychnine can be used in accordance with the label Directions for Use with minimal risk.
- **Moderate but Manageable Risk:** Any area or situation where the use of Strychnine poses an acceptable risk provided appropriate additional precautions imposed by the Authorising Officer are taken. Approval to use 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:** 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.

8. CLEAN UP AFTER STRYCHNINE USE, AND DISPOSAL OF WASTES

8.1. Disposal of animal carcasses

8.1.1. 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.

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

8.2. Disposal of unused Strychnine bait

8.2.1. 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.

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

8.2.3. 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.

8.3. 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.

9. NOTIFICATION, WARNING SIGNS AND DISTANCE RESTRICTIONS

9.1. Notification

9.1.1. 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.

9.1.2. The notification must provide the following information:

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

9.1.3. 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.

9.1.4. 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.

9.1.5. 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.

9.1.6. 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.

9.2. Warning Signs

9.2.1. 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/Authorised Officer, as appropriate, and (if applicable) the person laying the Strychnine baits or traps,
- 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.

9.2.2. The Approved User /Authorised Officer 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 collected (where practicable).

9.3. Distance Restrictions

9.3.1. For all Strychnine programs, Strychnine must be placed at least:

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

or as directed by the Authorising Officer.

9.3.2 The Authorising Officer may vary the above distance restrictions provided that the varied distance restrictions would not increase the risk to:

- public safety, and/or
- non-target species.

10. SAFETY AND FIRST AID

10.1. 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.

10.2. It is important to note that there is **no** effective antidote for Strychnine poisoning.

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

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

- If poisoning occurs, contact a doctor or Poisons Information Centre. **Phone 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.

10.5. Any changes to these instructions will be reflected on the Strychnine label.

11. LABELLING, PRECAUTIONS, STORAGE AND TRANSPORT

11.1. Labelling

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

11.1.2. 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.

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

11.2. Precautions

11.2.1. General

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

11.2.2. 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.

11.2.3. Protection of Livestock

Domestic stock must be excluded from the baited area until all bait has been consumed, buried, or (where practicable) retrieved. Caution must be exercised 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.

11.2.4. 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.

11.3. Storage

11.3.1. Storage of Strychnine must comply with all requirements of the:

- *Poisons Act 1964*,
- *Poisons Regulations 1965*
- *Health (Pesticides) Regulations 1956*
- *Poisons Standard 2008*
- *Dangerous Goods Safety Act 2004*, and
- *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*, as appropriate.

11.3.2. 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.

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

11.4. Transport

11.4.1. 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 1956,* 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.

11.4.2. All Strychnine products must be transported so that people, food, or animals cannot be contaminated.

12. ACCIDENT AND INCIDENT REPORTING

12.1. Investigation Policy

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

- The Section 24 Notice ,
- The Health (Pesticides) Regulations , 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.

12.2. Incident Investigation Coordinators

12.2.1. 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:

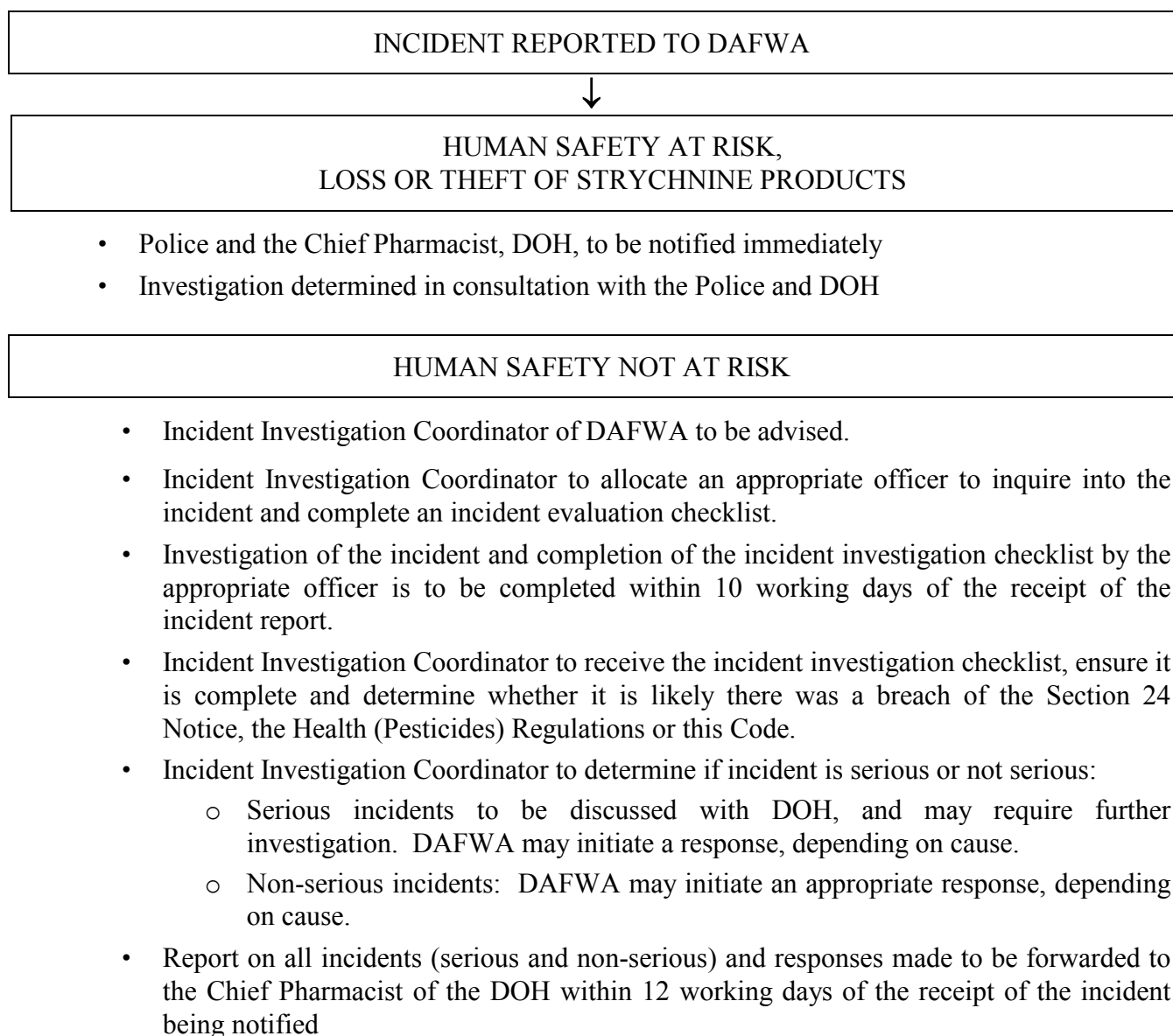
- Have successfully completed the Basic Training Course which includes basic instruction in investigation protocols, and,
- Where possible, not be involved in the Risk Assessment of, or the issuing of Authorisation Vouchers for, Baiting / Trapping Applications.

12.3. Classification of an ‘incident’

12.3.1 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,
 - 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 Strychnine products,
 - 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.

12.4. Incident Investigation Protocol



12.5. Agency Roles in incident investigation and response

12.5.1. 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.
- Advise the DAFWA of any investigations and outcomes of breaches of Strychnine usage.

12.5.2. 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.
- Meet annually with the DOH to review effectiveness of the Code and safety of the use of Strychnine.

12.6. Other incident reporting requirements

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

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

13. REQUIREMENTS FOR RECORD KEEPING

13.1. 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.

13.2. Department of Agriculture and Food.

13.2.1. 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,
- The names and address of Applicant.

13.2.2. Baiting / Trapping approvals and Authorisation Vouchers

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 Authorisation Voucher, and
- Ensure that a copy of the Authorisation Voucher is retained.

13.2.3. 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.

13.2.4. Audits

The DAFWA must undertake quality assurance and internal audits at least annually for compliance with the:

- *Poisons Act 1964*,
- *Health (Pesticides) Regulations 1956*,
- Section 24 Notice, and
- Their internal policies and procedures.

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

13.2.5. 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.

13.2.6. 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.

13.3. Department of Health

13.3.1. Compliance audits

To ensure the provisions of the *Poisons Act 1964*, *Health (Pesticides) Regulations 1956* 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.

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

13.4. 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*.

14. REVIEW AND UPDATE PROCESS

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

15. APPENDIX A

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

SCHEDULE 1

“Pastoral Area”

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

SCHEDULE 2

“Agricultural Areas”

Chapman Valley	Perenjori
Dalwallinu	Koorda
Esperance	Kondinin
Lake Grace	Kulin
Morawa	Northampton
Mt. Marshall	Mullewa
Mukinbudin	Yilgarn
Narembeen	
Ravensthorpe	Westonia