



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)**

**26 June 2025**

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## Foreword

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*.

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

This document was approved with effect from 26 June 2025 and replaces the Code of Practice for the Safe Use and Management of 1080, PAPP and strychnine in Western Australia (August 2019).

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

This version of the Code has been extensively re-written to improve clarity and readability. Detail in the Code has been limited to information necessary to support compliance with the Section 72 Notices, the *Medicines and Poisons Act 2014*, and the *Health (Pesticides) Regulations 2011*, for users, possessors and receivers of 1080, PAPP and strychnine products.

Queries relating to this Code should be directed to:

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## Definitions, abbreviations and acronyms

| Term                                           | Description or definition                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1080                                           | Manufactured version of sodium fluoroacetate; an organofluoride chemical compound used as a metabolic poison. The name 1080 is from the catalogue number for the poison.                                                                                                                                                                                                                                                     |
| 1080 bait                                      | An approved formulated meat, oat or other substance containing 1080 and used in the field for the control of vertebrate pests.                                                                                                                                                                                                                                                                                               |
| 1080 product                                   | A manufactured product containing 1080 that is registered with the APVMA. Products include, but are not limited to, baits and 1080 liquid concentrate.                                                                                                                                                                                                                                                                       |
| Act, or the Act                                | <i>Medicines and Poisons Act 2014</i>                                                                                                                                                                                                                                                                                                                                                                                        |
| ADG Code                                       | The Australian Code for the Transport of Dangerous Goods by Road & Rail (ADG Code) sets out the requirements for transporting dangerous goods by road or rail:<br><a href="https://www.ntc.gov.au/codes-and-guidelines/australian-dangerous-goods-code">https://www.ntc.gov.au/codes-and-guidelines/australian-dangerous-goods-code</a>                                                                                      |
| Applicant                                      | A landowner or occupier, Licensed pest management technician, Approved user, or Authorised officer who applies to an Authorising Officer for approval for the possession and use of 1080, PAPP or strychnine products for use by an Approved user. Applicants must be at least 18 years of age. The Applicant will become the Permit holder once a Permit is issued.                                                         |
| Application (Registered Pesticide Application) | A written request, in the prescribed format, for a permit to be issued to allow for possession and use of prescribed quantities of specified products on a specified property or area of land, by specified Approved users.                                                                                                                                                                                                  |
| Approved user                                  | A person who can be identified on a Permit as one who will possess, use and/or receive 1080, PAPP or strychnine (in the form of an APVMA registered pesticide) on a specified area of land. An Approved user can also be an Authorised officer, or a Licensed pest management technician.<br><br>An Approved user must have completed training at the appropriate level of competency for the uses identified in the Permit. |
| APVMA                                          | Australian Pesticides and Veterinary Medicines Authority. The APVMA is the Australian government authority responsible for the assessment and registration of pesticides and veterinary medicines and for their regulation up to and including the point of retail sale.                                                                                                                                                     |
| Authorised Department                          | Department of Primary Industries and Regional Development (DPIRD) or the Department of Biodiversity, Conservation and Attractions (DBCA).                                                                                                                                                                                                                                                                                    |

| Term                                | Description or definition                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 or strychnine.                                                                                                                                                                                                                                                                 |
| Authorising officer                 | An Officer who is trained to assess Applications and issue Permits on behalf of an Authorised Department.<br>Authorising officers must be authorised by the DG of the respective Authorised Department.                                                                                                                                                                                                                                            |
| Constructed recreation site         | Contains services and or facilities (for example carpark, ablution block, tables) for public use for visitation purposes including interpretation areas and information boards.<br>Includes public reserves and public spaces.                                                                                                                                                                                                                     |
| CPE                                 | Canid Pest Ejector. A spring activated baiting device that uses a piston to propel the liquid contents of 1080 or a PAPP capsule directly into the mouth of the canid as it pulls the bait placed on the head of the ejector. Dried meat, or an alternative lure, covers the lure holder that contains the capsule. The lure holder sits on top of the ejecting mechanism which is contained in a 15-18cm 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. Departmental officers may be formally delegated to carry out specific DG functions.                                                                                                                                                                                                                                                                                               |
| DoH                                 | Department of Health                                                                                                                                                                                                                                                                                                                                                                                                                               |
| DPIRD                               | Department of Primary Industries and Regional Development                                                                                                                                                                                                                                                                                                                                                                                          |
| DWER                                | Department of Water and Environmental Regulation                                                                                                                                                                                                                                                                                                                                                                                                   |
| GHS                                 | The Globally Harmonized System of Classification and Labelling of Chemicals which classifies chemicals by the types of hazard presented. It is intended to help communicate information about hazardous chemicals on labels and safety data sheets.                                                                                                                                                                                                |
| Incident                            | An event which gives rise to reasonable suspicion of a breach or suspected breach of the Section 72 Notices, or this Code.                                                                                                                                                                                                                                                                                                                         |
| LD <sub>50</sub>                    | The minimum amount of poison which, under control conditions, is lethal to 50% of a group of test animals of a particular species.                                                                                                                                                                                                                                                                                                                 |
| Licensed manufacturer or wholesaler | A business licensed under the <i>Medicines and Poisons Act 2014</i> to manufacture or wholesale 1080, PAPP or strychnine products.                                                                                                                                                                                                                                                                                                                 |



| Term                                       | Description or definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Licensed pest management technician (LPMT) | A pest management technician licensed by DoH in accordance with the Health (Pesticides) Regulations 2011, whose licence is endorsed to possess and use 1080, PAPP or strychnine products. Can be an applicant or an Approved user on an application. See: <a href="https://www.health.wa.gov.au/articles/n_r/pest-industry-licensing-and-registration">https://www.health.wa.gov.au/articles/n_r/pest-industry-licensing-and-registration</a>                                                |
| Licensed retailer                          | An entity licensed under the <i>Medicines and Poisons Act 2014</i> to sell or supply 1080, PAPP or strychnine products by retail sale.                                                                                                                                                                                                                                                                                                                                                       |
| Nominated retailer                         | The licensed retailer nominated by the Applicant to supply 1080, PAPP and strychnine products in accordance with a Permit.                                                                                                                                                                                                                                                                                                                                                                   |
| PAPP                                       | Para-amino propiophenone. Also known as 4-amino propiophenone. A yellow crystalline, synthetic (not naturally occurring) toxin, designed to be taken orally by canid and felid pests. When ingested, haemoglobin is converted to methaemoglobin, rendering the red blood cells unable to carry oxygen which leads to a rapid deficit of oxygen in vital organs, followed by death.                                                                                                           |
| PAPP product                               | A manufactured product containing PAPP and registered with the APVMA. Products include manufactured baits, capsules for use in CPEs and a paste form.                                                                                                                                                                                                                                                                                                                                        |
| PDWSA                                      | Public drinking water source areas. These areas are proclaimed under legislation administered by DWER. Surface water catchments may include reservoir protection zones and groundwater resources and may include wellhead protection zones. See: <a href="https://www.wa.gov.au/service/natural-resources/water-resources/public-drinking-water-source-area-mapping-tool">https://www.wa.gov.au/service/natural-resources/water-resources/public-drinking-water-source-area-mapping-tool</a> |
| Permit                                     | A written approval, issued by an Authorising officer, to possess and use prescribed quantities of specified products on a specified property or area of land. Also allows for the purchase of Schedule 7 products from retailers and wholesalers. Previously known as an Authorisation Voucher.                                                                                                                                                                                              |
| Permit holder                              | The Applicant to whom the Permit has been issued.                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Receiver                                   | A person who is nominated on the application to collect product from the nominated supplier.                                                                                                                                                                                                                                                                                                                                                                                                 |
| Registered pest management business        | A commercial business, licensed and regulated by DoH, which employs or engages Licensed pest management technicians (LPMTs). See: <a href="https://www.health.wa.gov.au/articles/n_r/pest-industry-licensing-and-registration">https://www.health.wa.gov.au/articles/n_r/pest-industry-licensing-and-registration</a>                                                                                                                                                                        |
| SDS                                        | Safety Data Sheet                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Term               | Description or definition                                                                                                                                                                                                                     |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Section 72 Notices | Medicines and Poisons (Section 72) (Registered Pesticides 1080 and PAPP) Notice 2018; and<br>Medicines and Poisons (Section 72) (Registered Pesticide Strychnine alkaloid) Notice 2018, published in the Government Gazette on 20 April 2018. |
| Strychnine         | A highly toxic alkaloid which occurs naturally in some plants of the genus <i>Strychnos</i> , particularly <i>Strychnos nux-vomica</i> .                                                                                                      |
| 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.                                                  |
| Water body         | Dam or strategic water supply, community water supply, any permanent flowing water course or any strategic body of water identified by local knowledge.                                                                                       |

## 1 Introduction

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

This Code is developed collaboratively by the Authorised Departments and the Department of Health (DoH) and approved by the DoH.

The Code only applies within Western Australia (WA). The Code does not apply to any pesticide other than 1080, PAPP or strychnine.

1080, PAPP and strychnine are classified as Schedule 7 poisons (labelled Dangerous Poisons) in the national Poisons Standard and the Schedules of this standard are adopted by the *Medicines and Poisons Act 2014* (Act). The Act is the primary legislation regulating the manufacture, sale and supply, use and possession of 1080, PAPP and strychnine in WA.

## 2 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, PAPP and strychnine products must follow the Australian Pesticides and Veterinary Medicines Authority (APVMA) registered label and safety directions, and additional information found on the Safety Data Sheet (SDS).

It is important to note there is no antidote for 1080 or strychnine poisoning. The use of methylene blue to reverse PAPP poisoning may not be suitable for all patients and is often not available at veterinary clinics.

Persons undertaking approved training will receive first aid and safety instruction applicable with the level of risk of exposure. First aid instructions are provided on the label of the 1080, PAPP or strychnine product. Any changes to these instructions will be reflected on the 1080, PAPP or strychnine product label and the SDS, which is available from licensed retailers and generally also from the manufacturer’s website.

## 3 Legislative framework

The Department of Health is the government agency responsible for administering the *Medicines and Poisons Act 2014*, the Section 72 notices and the *Health (Pesticides) Regulations 2011*. The Department of Biodiversity, Conservation and Attractions (DBCA) and the Department of Primary Industries and Regional Development (DPIRD) are identified as Authorised Departments who hold responsibilities for ensuring training, auditing and compliance with the Code.

Breaches of the Code may result in:

- a formal warning
- a requirement to undertake further training
- cancellation of approval to supply or use 1080, PAPP or strychnine
- prosecution.

## 4 The Authorised Departments

The Authorised Departments issue permits to use 1080, PAPP and strychnine in accordance with Table 1. The Authorised Departments manage the activities necessary to support the requirements of the Section 72 Notices, including responsibility for the registered pesticide application process, risk assessments, investigations, and audits.

Table 1: Authorised Departments responsible for issuing a permit for use of the registered pesticides 1080, PAPP and strychnine.

| Authorised Department                                                                                                                                                                                                                              | The purpose for which registered pesticide permits are issued                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| Department of Biodiversity, Conservation and Attractions<br>email: <a href="mailto:ecosystemhealth@dbca.wa.gov.au">ecosystemhealth@dbca.wa.gov.au</a><br>web: <a href="http://www.dbca.wa.gov.au">www.dbca.wa.gov.au</a><br>tel: (08) 9219 9000    | All use of 1080 and PAPP for the purposes of conservation.                                                      |
| Department of Primary Industries and Regional Development<br>email: <a href="mailto:rp.applications@dpird.wa.gov.au">rp.applications@dpird.wa.gov.au</a><br>web: <a href="http://www.dpird.wa.gov.au">www.dpird.wa.gov.au</a><br>tel: 08 9777 0123 | All use of 1080, PAPP and strychnine for the purposes of protection of agriculture and other industry purposes. |

## 5 Training

### 5.1 Authorising officers, Authorised officers and Approved users

Authorising officers, Authorised officers and Approved users (see definitions, abbreviations and acronyms) must successfully complete the relevant level of training. Training is delivered by an Authorised Department or a Registered Training Organisation.

The Basic Training Course relevant to 1080, PAPP and strychnine, must include the following:

- the legislative framework for the supply, possession, storage and use in WA
- the 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 and the use of strychnine in a safe and compliant manner
- the ability to identify signs of poisoning and effect appropriate first aid treatment
- requirements for the safe storage and transportation of poison products
- requirements for record keeping and notification of incidents.

Training is provided at different levels in recognition of the different competencies required for the use of different products and situations. An Approved user and Authorised officer must have completed training to the relevant competencies to undertake the uses identified in the Permit application. The required competencies for each use are shown in Figure 1. Training is provided online and, subject to the competency level, may include a practical component.

Refresher training for Approved users, Authorised officers and Authorising officers must be undertaken at a minimum of every 5 years to maintain currency. After completion of the initial training and one refresher training course (that is after 10 years), Authorising officers, Authorised officers and Approved users are required to again complete the full online training and practical assessment.

Approved users and Authorised officers who have not held a permit or have not been listed on a permit as a user for 3 years or longer will be required to complete the full online and practical training program.

Authorising officers must undertake training to acquire and update skills needed to conduct a Risk Assessment and to investigate an incident involving 1080, PAPP or strychnine.

## **5.2 Authority to use 1080 concentrate**

Subject to appropriate training (Figure 1) and risk assessment, Approved users may be authorised to use 1080 liquid concentrate.

## **5.3 Licensed Pest Management Technicians**

Licensed Pest Management Technicians (LPMTs) must complete national training units of competencies delivered by a Registered Training Organisation. DoH provides information guides on the required training for LPMTs at:

[https://www.health.wa.gov.au/Articles/N\\_R/Pest-industry-licensing-and-registration](https://www.health.wa.gov.au/Articles/N_R/Pest-industry-licensing-and-registration)

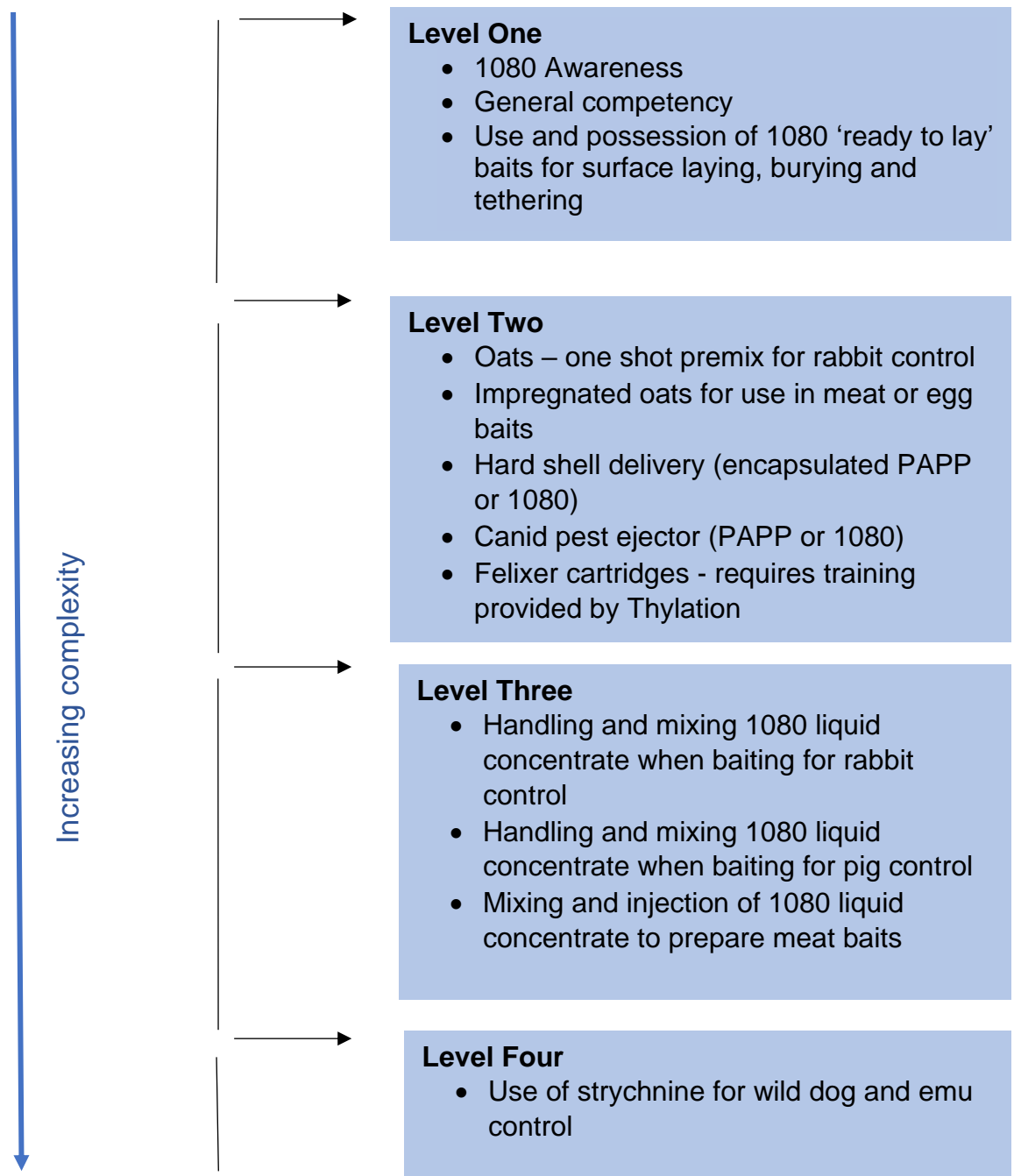


Figure 1: Required competencies for Authorising officers, Authorised officers and Approved users, where training is delivered by an Authorised Department or a Registered Training Organisation.

## 6 Manufacture and wholesale supply of 1080, PAPP and strychnine products

Businesses that manufacture and supply 1080, PAPP and strychnine products by wholesale within WA must hold a licence under the *Medicines and Poisons Act 2014*. DoH's Medicines and Poisons Regulation Branch assess and process applications for these licences. These licences are only issued for the manufacture and wholesaling of APVMA registered products.

Manufacture and wholesale licensed businesses can supply products, once appropriate proof of authority has been provided (Permit), to a LPMT, an Authorised officer, a Registered Pest Management Business, a licensed Schedule 7 retailer and or other wholesale or manufacturing business.

## **7 Retail sale and supply of 1080, PAPP, and strychnine products**

Businesses that supply 1080, PAPP and strychnine products by retail within WA must hold a licence under the *Medicines and Poisons Act 2014*. DoH's Medicines and Poisons Regulation Branch assess and process applications for these licences. Schedule 7 Retail Licences for agricultural and veterinary chemicals are only issued for the sale and supply of APVMA registered products.

Retail businesses can supply products, once appropriate proof of authority has been provided (Permit), to a LPMT, an Approved user, Authorised officer, a nominated Receiver, or a Registered Pest Management Business.

## **8 Available forms of 1080 and PAPP products**

1080 and PAPP are available for feral cat, wild dog, rabbit, fox and feral pig control. Unless otherwise stated, 1080 is available to LPMTs and Approved users in the following forms and, subject to risk assessment and demonstration of appropriate training competencies, is approved for use as:

- manufactured products for feral cat, fox, wild dog, and feral pig control
- 1080 impregnated oats for rabbit, fox, and wild dog control
- capsules for use in Canid Pest Ejectors (CPEs) for fox (3 mg) and wild dog (6 mg) control
- cartridges (8 mg 1080 in gel formulation) for use with a feral cat grooming device
- liquid concentrate for mixing with grain for rabbit and feral pig baiting (Level Three competency)
- liquid concentrate for injection into raw meat baits for fox and wild dog control (Level Three competency)

PAPP is available in the following forms:

- manufactured bait products for feral cat, fox, and wild dog control
- capsules for use in CPEs for fox (400 mg) and wild dog (1000 mg) control
- paste for use on wild dog traps, subject to additional WA permit conditions.

## **9 1080 and PAPP approved uses**

Approved users must only use 1080 and PAPP products for purposes that have been approved in accordance with the risk assessment, permit and label conditions. The Applicant must comply with any written procedures and instructions provided, or conditions imposed, by an Authorising officer.

## **10 Strychnine**

### **10.1 Available forms and approved uses of strychnine**

In WA, strychnine is only available in crystal alkaloid form.

The use of strychnine in WA is restricted to two uses: on the jaws of wild dog traps; and in emu control. 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.

### **10.2 Strychnine for wild dog control**

If padded-jaw leghold traps are used for wild dog control, the jaws of the trap must be bound with cloth containing strychnine, as mandated by the Animal Welfare (General) Regulations 2003. The amount of strychnine must be sufficient to ensure a rapid death for any animal likely to be caught in the trap.

LPMTs and Approved users are authorised to use strychnine in association with wild dog trapping in certain local government areas (which include pastoral and adjacent agricultural areas) listed in the Schedule of the Section 72 Notice for strychnine. Use of strychnine in other locations must be approved by an Authorising officer.

### **10.3 Strychnine for emu control**

Emus have an elevated tolerance to 1080 poison due to evolutionary exposure to some native plants containing fluoroacetate. Therefore, in some circumstances where 1080 may be ineffective, it may be appropriate to use strychnine for emu control, such as periods when high emu populations are affecting agriculture.

The use of strychnine for emu control is subject to the Applicant obtaining a 'fauna causing damage' licence from DBCA before a Permit can be issued. When applying for a fauna causing damage licence, Applicants will need to demonstrate how they will prevent non-target species from being affected.

Strychnine products for emu control can only be used by Approved users who hold the appropriate competency and by LPMTs.

## **11 Registered Pesticide Application (the application)**

### **11.1 The application form**

The applicant must complete an application for a Permit to use specified 1080, PAPP or strychnine products on a specified property or area of land during one or more specified period(s). Registered Pesticide Application forms are available from the relevant Authorised Department's website or on request.

### **11.2 The application and categories of applicant**

When completing a Registered Pesticide Application the Applicant is required to meet one or more of the criteria listed in Table 2. Approval of the application will result in a permit issued to an individual, not an organisation.



Table 2: Requirement for each category of applicant when applying, as the permit holder, to use 1080, PAPP or strychnine products.

| <b>Category of Applicant</b>        | <b>Criteria</b>                                                                                                                                                                                                                                                                                           |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Landowner or Occupier               | A person who identifies as the owner or occupier, by provision of rates notice, contract or Registration of Native Title Certificate (RNTC) with a RNTC number, as responsible for nominated lands.                                                                                                       |
| Licensed Pest Management Technician | A LPMT must be able to provide evidence of authorisation for undertaking control activities on nominated lands.                                                                                                                                                                                           |
| Authorised Officer                  | An Authorised officer must be able to demonstrate they are acting in a regulatory capacity and have oversight of the pest control operation.                                                                                                                                                              |
| Approved User                       | An Approved user who has completed the required training and can be identified on an application as one who will possess, use and or receive 1080, PAPP or strychnine (in the form of an APVMA registered pesticide) on a specified area of land <b>and</b> have oversight of the pest control operation. |

The Permit holder is responsible for compliance with all conditions of the Permit and compliance by all identified users operating under the Permit.

With the exception of the nominated receiver, all persons in possession of 1080, PAPP and strychnine products must have received training and fulfilled relevant competency requirements (Figure 1). The nominated receiver must be provided with the relevant documentation and advice for transporting 1080, PAPP and strychnine products.

### **11.3 The supplier, receiver, and approved users**

The application must list the:

- nominated retailer, or wholesaler, or manufacturer
- nominated receiver, who is identified as the person approved to collect 1080, PAPP or strychnine products. An Approved user can also be listed as the nominated receiver
- Approved user(s), who will be in possession of 1080, PAPP or strychnine (in the form of an APVMA registered pesticide) for use on a specified area of land.

### 11.4 Land holding restrictions

Permits will not be issued to Applicants for land holdings of less than 20 (twenty) hectares (approximately 49.4 acres) unless:

- the specified property in the permit application is part of a larger community baiting area comprised of individually owned, contiguous landholdings where each may be less than 20ha, with a combined area of at least 20ha; **and**
- the baiting program on the combined larger area is carried out as one baiting program, and not in separate sections or properties. In such cases the combined small landholdings will be assessed as one larger property area.

For land holdings of less than 20ha in total size, other control options will need to be considered.

### 11.5 Product use and placement

The type and placement of 1080, PAPP or strychnine products proposed for use throughout the application's proposed duration must be specified in the application.

In the case of large-scale programs (such as aerial baiting or wild dog trapping on pastoral holdings), as an alternative to identifying where product will be used, it is acceptable in the application to identify those exclusion zones where products will not be used, such as adjacent to a homestead and buildings or water course etc.

### 11.6 Native species presence

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

Risks to native fauna is assessed according to the LD<sub>50</sub> and likelihood of exposure to toxin and or consumption and risk to local populations. Details of LD<sub>50</sub>, exposure risk analysis and risk assessment framework can be found at:

<https://www.dbca.wa.gov.au/management/threat-management/invasive-animals/feral-cats/using-eradicator-feral-cat-management>

### 11.7 Ground baiting using 1080

Ground baiting programs using 1080 must place baits or other 1080 products no closer than:

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

Ideally baits should be placed on the surface of the ground, under vegetation or otherwise as approved by the Authorising officer.

Changes to distance restrictions may be considered for approval by the Authorising officer as part of the risk assessment process. Distance restrictions from neighbouring properties may also be amended by written consent from neighbouring landholders and with approval from the Authorising officer.

## 11.8 Ground baiting using PAPP

Ground baiting programs using PAPP must place baits or other PAPP products no closer than:

- 150 metres from a dwelling or constructed recreational site
- 20 metres from permanent or flowing water bodies
- 20 metres from the edge of formed, gazetted public roadways
- 5 metres from boundary fences
- 500 metres from native bush reserves, state forest or national park boundaries, flora and fauna reserves, crown land, roadside reserves and revegetation areas.

Other conditions when using PAPP baits and products include:

- PAPP should only be considered when native fauna is not present or, at the very least, not active.
- PAPP baits are to be buried in a shallow hole (< 8cm deep) where the baits can be placed and covered with soil to reduce access by non-target animals.
- PAPP bait stations are to be checked twice a week during the baiting program.
- No more than one bait can be laid 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 sheds, homesteads and watering points. It is not for extensive use on pastoral stations.
- Untaken PAPP baits and animal carcasses should be recovered (if possible) and disposed of in accordance with label specifications and this Code.

As above for 1080, changes to distance restrictions may be considered for approval by the Authorising officer as part of the risk assessment process. Distance restrictions from neighbouring properties may also be amended by written consent from neighbouring landholders and with approval from the Authorising officer.

## 11.9 Aerial baiting

Aerial baiting programs using 1080 baits for the control of foxes, cats, or wild dogs, are more practical and cost effective when delivered at a landscape scale. A permit for aerial baiting will only be issued where the product label identifies the product as suitable for aerial delivery and is subject to the distance restrictions listed below.

**Aerial baiting programs with PAPP manufactured products are not considered suitable in Western Australia.**

When aerial baiting, 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
- 250 metres from constructed recreation sites
- 250 metres from the edge of formed, gazetted public roadways.

Changes to distance restrictions may be considered for approval by the Authorising officer and approved as part of the risk assessment process.

### 11.10 Strychnine conditions

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

- 500 metres from a dwelling and constructed recreational sites
- 30 metres from 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.

### 11.11 Notification

Before use of 1080, PAPP or strychnine products can commence, the Permit holder (applicant) must notify:

- property owners and or occupants of properties adjoining the land where the product is to be used; and
- any other property deemed appropriate by the Authorising officer, and
- at least 3 days, but not more than 14 days, before bait laying or trapping commences.

For ongoing programs, the above notifications must occur prior to each of the recurring baiting or trapping stages.

Notification must provide the following information:

- the intention to use 1080, PAPP or strychnine products
- the period and location of baiting or trapping
- the potential risks to domestic animals and human health associated with the use of 1080, PAPP or strychnine products and
- the risks to human health if poisoned animals are handled or consumed.

If the start of baiting or trapping is delayed and the baiting period or strychnine use period is extended beyond the cessation date given in the notice, another notice of intent to lay baits or traps is required at least three days prior to the original cessation date, advising of the extension.

Subject to the risk assessment, an exemption may be granted from the requirement to notify occupiers of adjacent properties where targeted baiting programs are well within a parcel of land and where the program is more than 10km from the neighbouring property.

Notification can be by:

- letter or email
- telephone, or in person, provided this is accompanied by a signed statutory declaration that the person approved to use 1080, PAPP or strychnine has spoken with the owners or occupiers of properties adjoining the land where the product will be used, and
- in the case of broad scale 1080 baiting programs, state and local media newspapers, social media, radio and television as approved by the DG, DoH.

Records of all notifications should be kept by the person responsible for notification (Permit holder or Approved user) for at least 5 years.

### 11.12 Warning signs

Before 1080, PAPP or strychnine products can be deployed, the Applicant (Permit holder) must ensure prominent warning signs with pictograph are erected at entrances and strategic points on the property or area of land on which the product will be used. The warning sign must display:

- the date that the product is to be laid
- the contact numbers of the Applicant (Permit holder) and (if applicable) the Approved user
- the pesticide name
- the target animals
- a warning that domestic animals and pets can be affected.

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

The Permit holder must maintain warning signs for at least 2 months after the period authorised on the Permit.

In the case of ongoing baiting where products will be in use on a continuing basis, warning signs must state that baiting occurs on an ongoing basis.

### 11.13 Mapping

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

- the general areas where baiting is likely to occur
- all dwellings on the property or area of land to be baited or where strychnine is to be used
- dwellings on neighbouring properties within 150 metres (for 1080 and PAPP) and 500 metres (for strychnine) of the common boundary
- formed and gazetted roads
- permanent or flowing water bodies
- constructed recreational sites
- exclusion zones where baits (1080, PAPP) or strychnine-treated traps will not be used
- the proposed location of poison warning signs
- any additional requirements made by the Authorising officer.

The baiting boundary for areas where baiting is likely to occur must be identified on the map for large scale baiting programs, such as aerial baiting.

A bait-free buffer of 100m from the full supply level must be indicated for Public Drinking Water Source Areas (PDWSA, see definitions).

In the case of PAPP, all areas of native vegetation managed for conservation and or revegetation within 500m of the property or area of land boundary must be clearly identified.

## 12 Risk assessment

When an application is received, an Authorising officer must conduct a risk assessment in accordance with the requirements of this Code.

The risk assessment must be undertaken before a Permit is issued to use a 1080, PAPP or strychnine product on a specified property or area of land. It must consider all aspects of the information supplied in the application and assess any risks to non-target species, including domestic pets and native fauna and any risks associated with human interaction.

The Authorising officer may vary the distance restrictions for both ground and aerial baiting provided the variation would not increase the risk to the public or the environment, including non-target species.

As part of the risk assessment, Authorising officers must consider the presence of any PDWSA. The Department of Water and Environmental Regulation (DWER) advises that emu baiting with strychnine is not recommended in PDWSA.

An Authorising officer will assess the application according to 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 application.
- Extreme Risk (E). Any area or situation where the use of 1080 and PAPP baits 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 bait will be refused.

The Authorising officer may assess an application and issue a Permit for a maximum period of 5 years, provided the circumstances that prevailed when the risk assessment was undertaken remain unchanged. At the end of each Permit period, the applicant will be required to submit a new application, which will also require a new risk assessment. Similarly, a new risk assessment is required within the period covered by a Permit if there is a change in ownership or occupancy of the property or area of land; a change to the land use or structure of the property or area of land; or change to surrounding land use.

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.

## 13 The Permit

The Permit carries a unique identification number referenced back to the respective Risk Assessment Approval and Application.

If the Application is approved, all use, transport and storage of the products listed must be in accordance with this Code of Practice. The Authorising officer must issue a Permit specifying the:

- name and address of the Applicant
- name and address of the Receiver(s)
- name and address of all Approved users
- name and agency of the Authorising officer
- expiry date for the period during which 1080, PAPP or strychnine products can be supplied and used
- quantity, type, and concentration of 1080, PAPP or strychnine products that can be supplied within a specified period
- name and address of the nominated retailer, manufacturer, or wholesaler who will supply products in accordance with the Permit.

In addition to the above, and where the conditions for the following are different from those prescribed in the Code, an Authorising officer can detail:

- distance restrictions
- exclusions
- notifications
- warning signs
- any additional special conditions.

The Authorising officer must ensure the Applicant is aware of any special conditions detailed on the Permit. It is the responsibility of the Applicant (Permit holder) to advise all Approved users 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, PAPP and strychnine at any time by written notice to the Permit holder. It is the Permit holder's responsibility to advise the Approved user(s) of any changes, and the responsibility of the Approved user(s) to apply these changes.

The Permit will be distributed by the Authorising officer as follows:

- electronic copy (or hard copy if requested) to the Permit holder and
- electronic copy to the Nominated Retailer.

Where appropriate, the Authorising officer will also provide an electronic or hard copy of the permit to the relevant Recognised Biosecurity Group.

Baiting and or trapping cannot be undertaken past the expiry period of the Permit and only those persons listed on Permit can be engaged in the control program.

The Permit holder is responsible for notifying the Authorised Department of any changes that may affect the risk factors or any proposed changes to the Approved



users or Receivers. Such changes will require the Permit to be amended once the Authorising officer is satisfied all persons are trained in accordance with the Code.

## 14 Transport

All 1080, PAPP and strychnine products must be transported in accordance with the following and in reference to the SDS for the product:

### Approved users

- A SDS must be supplied by the manufacturer or wholesaler or retailer, and must accompany the transport of 1080, PAPP or strychnine products.
- All 1080, PAPP and strychnine products must be transported in a manner to minimise the risk of contamination of people, food, or animals.
- All 1080, PAPP and strychnine products must be placed into a double locked container or cage or approved equivalent, labelled with the word 'Poison', and securely fixed and locked to a vehicle.
- Products must be stowed for transport in a double locked situation except when required for immediate use.
- Any 'approved equivalent' container must be approved in writing by an Authorising officer.

### Retailers and manufacturers and wholesaler suppliers

- The person supplying 1080, PAPP or strychnine products to a Receiver, courier or common carrier is responsible for providing them with appropriate instruction on the safe handling, storage and transport of 1080, PAPP, and strychnine products.
- Consignors should ensure compliance with the relevant Dangerous good safety guides, including where dangerous goods packages are below placard load quantity: <https://www.worksafe.wa.gov.au/dangerous-goods-safety-guides>

### Couriers and common carriers:

- Couriers are required to read and, where applicable, ensure compliance with the current Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code): <https://www.ntc.gov.au/codes-and-guidelines/australian-dangerous-goods-code>.
- Couriers, as transporters ONLY of products, are exempt from training or transport requirements required by Approved users.

## 15 Storage, access and labelling

### 15.1 Storage of products other than concentrates

Both the *Medicines and Poisons Act 2014* 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 and stored in accordance with the label instructions.

Products must be stored in a double locked situation. A locked box or locked cabinet inside a locked shed is considered sufficient.

All products are recommended to be used within 12 months.



Approved Users must not store 1080, PAPP or strychnine products after the approved period stated on the Permit.

## 15.2 Storage of concentrates

Concentrates (including liquids and poisoned oats) must be kept dry, in their original labelled container and must be stored inside a chemical safe or equivalent approved by an Authorising officer. The chemical safe must be labelled with the word 'Poison', fastened to a solid concrete floor (not concrete slabs), attached to the wall of the premises.

Warning signs at bait stores must include the term "poison" and the Global Harmonisation Scheme (GHS) signal word and pictograph, below.



# POISON

## 15.3 Access

All Schedule 7 poisons must be stored so they are accessible only to approved users including Authorised officers, and LPMTs.

For retail businesses, unsupervised access to Schedule 7 poisons must be limited to the store owner and employees. Customers, who have authority to purchase Schedule 7 poisons, are only permitted to access storage areas under the supervision of the owner or an employee.

Appropriate signage must be displayed on the premises adjacent to the main entry indicating hazardous chemicals are being stored on site.

## 15.4 Labelling

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

Field prepared baits must be placed in a sealable container of sufficient strength and impermeability to prevent leakage during handling and transport. All field prepared products must be labelled with the wording as specified in the national Poisons Standard and its Schedules with the first two lines worded as:

## **DANGEROUS POISON**

*Keep out of reach of children*

The minimum additional label requirements must identify the:

- bait substrate
- toxin used to prepare the bait
- date of preparation
- number of baits in the labelled container
- purpose (the target pest species)

All field prepare baits must be stored, accessed and transported according to Code requirements, above i.e. sections 15.1, 15.3 and 14, respectively.

## **16 Requirements for record keeping and auditing**

All persons dealing with 1080, PAPP and strychnine products must keep records of the storage, transfer, and use of these products. Records must include:

- details of all 1080, PAPP and strychnine products received from, and consigned to, Licensed manufacturers or wholesalers, Licensed retailers, LPMTs and Approved users
- 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 or voucher issued by the Authorised Department.

Wholesalers and Retailers must:

- document the proof of authority supplied to them by the client and keep this record for 5 years
- keep records of supply, as required by the *Medicines and Poisons Regulations 2016*, for 5 years.

The *Health (Pesticides) Regulations 2011* requires records of pest management treatments undertaken by LMPTs to be kept for 3 years. The *Biosecurity and Agriculture (Agricultural Chemical Record Keeping) Regulations 2020* requires the land owner or occupier to keep these records for 2 years.

LPMTs, Landholders or Occupiers and Approved users must make their storage premises and associated records and other documentation relating to the supply, possession and use of 1080, PAPP and strychnine available for audit by officers of DPIRD, DBCA or DoH as required.

## **17 Disposal**

### **17.1 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 area of land, or any adjacent property, must be disposed of by:

- burying to a depth of at least 0.5m below natural ground level, with burial to be greater than 100m from the high-water mark from any water body or reservoir or
- complete incineration of the carcass, except when local fire bans are in place or

- burial 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 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.

DWER makes specific recommendations in relation to animal carcass disposal in any gazetted PDWSA. [Water Quality Protection Note 96](#) recommends carcasses should not be buried in PDWSA, but where removal is not feasible, carcasses should be buried individually and at least 100m from the centre line of any watercourse or 100m from the high-water mark of any reservoir.

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.

Prior to disposal, and within 24 hours of the recorded deaths, all native species deaths must be reported to DBCA.

## **17.2 Disposal of unused 1080 and PAPP products**

At the conclusion of the approved baiting period, all unused and unconsumed 1080 or PAPP baits in the possession of the Approved user must be disposed of by:

- burial at least 0.5m below natural ground level in a dry site at least 20m from the high-water mark from any water course, on the same property or area of land 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.

For ongoing baiting programs, baits can be stored consistent with each product's shelf life or otherwise for up to 12 months.

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

## **17.3 Disposal of strychnine**

At the conclusion of the approved baiting or trapping period, all strychnine products and materials contaminated with strychnine, including hessian or other cloth impregnated with strychnine, must be disposed of by complete incineration (except when fire bans apply). The resulting ash must be buried at least 0.5 metre below natural ground level in a dry site at least 20 metres from the high-water mark from any water course, on the same property or area of land 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 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.

## 17.4 Disposal of used 1080, PAPP and strychnine containers

Used 1080, PAPP and strychnine containers must be thoroughly decontaminated in accordance with the registered APVMA label instructions and, where appropriate, containers punctured, flattened, or otherwise damaged to render unusable, and disposed of by:

- burial at least 0.5m below natural ground level in a dry site at least 20m from the highwater mark from any 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 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.

## 18 Incident reporting

Those using 1080, PAPP and strychnine products must immediately report all incidents involving these products to the relevant Authorised Department. Where the incident is thought to contravene or have the potential to contravene the *Medicines and Poisons Act 2014*, the Section 72 notices, or this Code, the Authorised Department will initially investigate the incident and submit a report to the DoH.

| To report to DPIRD                                                                                                                                                                                       | To report to DBCA                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| Registered Pesticides Applications<br>email: <a href="mailto:rp.applications@dpiird.wa.gov.au">rp.applications@dpiird.wa.gov.au</a><br>tel: (08) 9368 3080 or local DPIRD office or Authorising officer. | Ecosystem Health Branch<br>email: <a href="mailto:ecosystemhealth@dbca.wa.gov.au">ecosystemhealth@dbca.wa.gov.au</a><br>or local DBCA office. |

Incident investigation may be transferred to a different Authorised Department if initial investigation indicates the incident may be linked to a baiting activity authorised by or undertaken by that other Authorised Department.

Any domestic dog deaths suspected to be the result of 1080 poisoning should be reported to the Authorised Department within 24 hours of the recorded death.

Licensed manufacturers and wholesalers, licensed retailers and couriers must report all incidents involving 1080, PAPP and strychnine products directly to DoH by emailing [MPRB.Compliance@health.wa.gov.au](mailto:MPRB.Compliance@health.wa.gov.au) or calling 9222 6883 (Option 4).

LPMTs and registered Pest Management Businesses, must immediately report all incidents that have caused death, injury or harm to a person(s) to the Chief Health Officer at DoH (in accordance with the Health (Pesticides) Regulations 2011) by emailing [pesticidesafety@health.wa.gov.au](mailto:pesticidesafety@health.wa.gov.au) or calling 9222 2000.

It is also a requirement of the Medicines and Poisons legislation that theft or loss of any 1080, PAPP or strychnine product (including theft or loss of field-prepared baits) be reported to DoH by emailing [MPRB.Compliance@health.wa.gov.au](mailto:MPRB.Compliance@health.wa.gov.au). If theft is suspected, a report should also be made to WA Police.

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