

Queensland Health Departmental Standard

Dealing with restricted S7 poisons for invasive
animal control – version 1

27 September 2021



Queensland
Government

Queensland Health Departmental Standard: Dealing with restricted S7 poisons for invasive animal control — version 1

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Preface

The Departmental Standard – *Dealing with restricted Schedule 7 poisons for invasive animal control* (this Standard) has been made pursuant to section 233 of the *Medicines and Poisons Act 2019* (the Act) by the Chief Executive of Queensland Health, and establishes the minimum requirements for using restricted Schedule 7 (RS7) poisons for the control of invasive animals in Queensland.

Maintaining the health and wellbeing of users of regulated substances, as well as the general public who may be exposed to these substances, is the primary focus of the medicines and poisons regulatory framework. By achieving the main purposes of the Act, Queensland Health is confident that this outcome will be achieved.

Compliance with this Standard will assist in ensuring public health is protected during all dealings with RS7 poisons for invasive animal control.

This Standard must be followed where it is referenced by the Act or Medicines and Poisons (Poisons and Prohibited Substances) Regulation 2021 (the Poisons Regulation) or when it is required as a condition of an authority.

The Standard provides minimum criteria and acceptable actions to achieve the required outcomes. Where more than one course of action is acceptable to achieve the outcomes required, the approved person or holder of the general approval may choose the option that is practicable to their needs.

The words 'must' or 'shall' used in this Standard mean the requirement is mandatory.

The words 'should' or 'may' recommends a discretionary course of action.

Object of this Standard

The object of this Standard is to ensure that RS7 poisons are stored, applied and disposed of in a way that is safe and protective of public health, and that these regulated substances are effective for their intended use.

RS7 poisons are extremely dangerous poisons that have the potential to cause death or serious harm to human health. In addition to human health – these poisons can also inadvertently impact the health of animals not intended to be targeted by baits. However, RS7 poisons also have properties that make them useful for a range of applications in industry, agriculture and scientific processes. This means that risks to health and the environment, including non-target species must be managed effectively. Further, the integrity and quality of the poison must be maintained to ensure it is fit for purpose.

Compliance with this Standard, and the requirements prescribed in the Poisons Regulation, is required to carry out these regulated activities in the authorised way, as well as safely and effectively.

A range of activities associated with the use of poison baits have been identified and regulated in the Poisons Regulation to prevent risks to life or safety of a person or non-target animal and to ensure the integrity and quality of baits. The activities addressed in this Standard relate to:

1. Transport and storage of RS7 poisons
2. Notification of laying poison baits
3. Preparation and laying of poison baits
4. Placement of poison baits
5. Record keeping
6. Waste management
7. Incident reporting


Persons complying with this Standard must also be aware that the Poisons Regulation prescribes standard conditions and requirements relating to the use of RS7 poison baits which must also be complied with.

Scope

This Standard applies to persons who are intending to use RS7 poisons for the control of invasive animals in Queensland. This includes holders of a general approval or persons who are designated as an approved person (invasive animal controller) under Schedule 2, Part 3 of the Poisons Regulation.

Section 23 of the Poisons Regulation provides that it is a standard condition of a general approval authorising dealing with a RS7 poison to control invasive animals, that the holder of the general approval must deal with the RS7 in accordance with this Standard.

Baits may include fresh meat baits, grain baits, fruit baits, manufactured (shelf stable) baits or pest ejector devices or lethal traps.



This Standard sets out minimum requirements for mitigating public health risks associated with baiting activities using RS7 poisons. For ease of reference, this Standard is comprised of three parts.

Part 1 – General, applies to all persons who may deal with a RS7 poison either as the holder of a general approval or as an approved person. Approved persons include rural landholders authorised under Schedule 2, Part 3, Division 3 of the Poisons Regulation, who have been supplied the baits by an authorised officer under Schedule 2, Part 3, Divisions 1 and 2 of the Poisons Regulation.

Part 2 – Additional requirements for authorised officers, applies to persons authorised under the *Biosecurity Act 2014* and *Nature Conservation Act 1992*. The Poisons Regulation requires authorised officers to possess and apply baits to control invasive animals in accordance with this Standard.

Part 3 - Additional requirements for commercial baiting operators, who provide baiting services on a 'fee-for-service' basis and who are authorised under a general approval.

Where a permit has been granted by the Australian Pesticides and Veterinary Medicines Authority (APVMA) to use a RS7 poison for a specific baiting activity, the conditions of the permit must be followed, unless the permit allows the State to vary the conditions.

Part 1 - General

Transport and storage of RS7 poisons

Activity	Requirements
1.1. Storage during transport	<ul style="list-style-type: none">A. RS7 poisons must be transported¹ in a sturdy, leak-proof immediate container that is stowed in the vehicle in a way that prevents contamination of the vehicle.B. The immediate container must be secured in a lockable storage area that is either securely fixed to or within the vehicle during transport.C. The key or code to the lockable storage area must only be accessible by persons authorised by the approval holder or approved person.D. The immediate container must be clearly labelled with either the manufacturer's authorised label or the words "Dangerous Poison" and the name of the poison.E. RS7 baiting devices² must be disarmed during transport to prevent accidental activation.
1.2. Storage other than during transport	<ul style="list-style-type: none">A. The immediate container must be clearly labelled with either the manufacturer's authorised label or the words "Dangerous Poison" and the name of the poison.B. RS7 poisons must be stored in a secure area (e.g. locked box or a locked cabinet within a locked shed) to prevent access by unauthorised persons.C. Keys or codes to all storage containers and secure areas must only be accessible by persons authorised by the approval holder or approved person.D. RS7 baiting devices must be disarmed or inactivated while in storage.E. RS7 poisons must not be stored in a food/drink container or a container that resembles or may be mistaken for a food/drink container.F. Prepared (fresh meat) baits must not be stored for future use, i.e. frozen, refrigerated or dried.

¹ Restricted S7 Poisons are Class 6.1 dangerous goods under the Australian Dangerous Goods Code.

² For example, capsule ejector devices containing an RS7 poison.

Notification of laying poison baits

Activity	Requirements
1.3. Notification	<p>A. Notifications may be verbal or written. If written notice is given, it may be given in either electronic or paper form.</p> <p>B. The notification must be:</p> <ul style="list-style-type: none">provided to all adjoining and adjacent neighbours, including properties separated by roads and watercourses, andgiven at least 72 hours prior to commencement of baiting. <p>C. The notification must include:</p> <ul style="list-style-type: none">the steps to be taken to ensure children, or domestic and working animals, do not gain access to baits or poisoned animals, andthe dates between which baiting will occur.Appendix 1 to this Standard may be used to give written notification. This may also be used as a template for verbal advice. <p>D. Baiting must commence within ten (10) days of notification. If not, a new notification must be issued giving at least 72 hours' notice.</p> <p>E. Records of notifications (verbal or written) must be kept for two (2) years. Appendix 2 to this Standard is a template Record of notifications of intent to use RS7 poison that may be used for this purpose.</p>
1.4. Warning signs	<p>A. Warning signs must be placed at all entrances to the land being baited and at the extremities of the land boundaries fronting a public thoroughfare. This must be done even if the adjoining property is carrying out baiting.</p> <p>B. Warning signs must be put up immediately before baiting commences on the property.</p> <p>C. Warning signs must be maintained for at least four (4) weeks after the authorised period of bait lay has expired or after all untaken baits have been collected.</p> <p>D. Warning signs must be firmly fixed, weatherproof, legible and include the following information:</p> <ul style="list-style-type: none">name of poison useddate the baits were laidcontact details of the landownertarget animal/s; anda warning that livestock, domestic and working animals can be affected. <p>E. Warning signs must be replaced if damaged or no longer legible.</p> <p>F. If a property adjoins a public space (e.g. a roadside rest stop), warning signs should be placed in a way that is visible to a person in the public space.</p> <p>G. Appendix 3 to this Standard is a template for a warning sign.</p>

Preparation and laying of poison baits

Activity	Requirements
1.5. Preparation of baits (i.e. fresh meat, grain and fruit baits)	<ul style="list-style-type: none">A. Carcasses, rotten meat or meat with bones or skin attached must not be used in the preparation of meat baits.B. Baits must be prepared in accordance with the relevant APVMA permit or label instructions.C. Cereal, fruit or grain baits containing RS7 poison must be coloured green to clearly distinguish from cereal, fruit or grain used for human consumption.D. Any spills, waste or contaminated materials occurring in the bait preparation area must be collected and disposed of immediately.E. Washing facilities, spill kits and measures for disposing of waste must be readily available in the bait preparation area.F. Children, and domestic and working animals, must be prevented from entering the bait preparation area.

Placement of poison baits

Activity	Requirements
1.6. Application of baits	<ul style="list-style-type: none">A. Baits containing strychnine, 4-aminopropiophenone (PAPP) or more than 0.05% fluoroacetic acid must not be applied through aerial distribution from an aircraft.B. Individual baits must not be divided or split into smaller portions prior to application.C. Baits must not be laid:<ul style="list-style-type: none">• on any stock route or reserve for travelling stock without local government approval• within five (5) metres of a fenced boundary• within five (5) metres from the edge of a formed public roadway• within twenty (20) metres of permanent or flowing water bodies• within one hundred and fifty (150) metres of a dwelling.

Record keeping

Activity	Requirements
1.7. Record keeping	<p>A. Records must be maintained in relation to the quantity of RS7 poison acquired, applied (per baiting event) or disposed of.</p> <p>B. Records of application of baits must state the:</p> <ul style="list-style-type: none">• name of poison• date and quantity/number of baits applied• quantity of poison used, and• location³ where the baits were applied. <p>C. For unused poisons/baits or waste, records must be kept for:</p> <ul style="list-style-type: none">• the quantity of unused poison/bait• the date of disposal or surrender• the location of disposal, and• if surrendered, the person it was surrendered to. <p>D. Records must be retained for a period of two (2) years.</p> <p>E. Records must be made available on the request of an inspector under the <i>Medicines and Poisons Act 2019</i>.</p>

³ The location of baits should be recorded to allow them to be retrieved. Acceptable solutions include GPS recording of bait placement or similar mapping methods.

Waste management

Activity	Requirements
1.8. Disposal	<p>A. RS7 poison waste, contaminated material and where possible any partially eaten baits and dead animals, must be disposed of by:</p> <ul style="list-style-type: none">• burying at a depth of at least 50 cm on the landholder's property, or• by disposal at a licensed waste disposal facility that can accept the RS7 poisons, or• by incineration⁴. <p>B. Contaminated wastewater produced during the cleaning/rinsing of equipment, PPE or vehicles used to prepare or apply baits, must be disposed of in a way that does not contaminate food or water or endanger people or non-target animals.</p> <p>C. Unused RS7 poisons must only be disposed of as follows:</p> <ul style="list-style-type: none">• by burying at a depth of at least 50 cm, or• by disposal at a licensed waste disposal facility that can accept the RS7 poisons, or• by incineration⁴, or• return to the licensed retailer.

Incident reporting

Activity	Requirements
1.9. Reporting of incidents	<p>A. The following events must be reported to the Chief Executive Queensland Health:</p> <ul style="list-style-type: none">• any poisoning or suspected poisoning of a person• any loss or theft of RS7 poisons. <p>B. The notification must be given as soon as practicable within two (2) business days of an event occurring. If an oral report is given, a written report must be provided within seven (7) business days of when the oral report was given.</p> <p>C. Appendix 4 to this Standard is a template - Restricted S7 poison incident notification form.</p>

⁴ Incineration of containers must be undertaken at a facility authorised under the *Environmental Protection Act 1994* to thermally reprocess or treat waste.

Part 2 - Additional requirements for authorised officers

Record keeping

Activity	Requirements
2.1. Record keeping	<p>A. If supplying low-risk fluoroacetic acid baits to another person, records must be maintained in relation to:</p> <ul style="list-style-type: none">• the date of supply• the quantity of baits supplied• the name of the person and property supplied to, and• the quantity of any unused/waste baits that were disposed of. <p>B. If baits containing RS7 poisons are applied by the authorised officer, the following must be recorded:</p> <ul style="list-style-type: none">• geographical location marked on a registered plan (lot/plan number) or a clear map showing the property boundary and relative location of baits• quantity of baits applied, and• the date. <p>C. Records must be retained for a period of two (2) years.</p>

Part 3 - Additional requirements for commercial baiting operators

Record keeping

Activity	Requirements
3.1. Record keeping	<p>A. The approval holder must retain records of the RS7 poisons, including quantities obtained, supplied and used.</p> <p>B. If supplying RS7 poisons to another person, records must be maintained in relation to:</p> <ul style="list-style-type: none">• the date of supply• the quantity of baits supplied• the name of the person and property supplied to, and• the quantity of any unused/waste baits that were disposed of. <p>C. Records of baiting activities must state the following:</p> <ul style="list-style-type: none">• name of the poison• date and quantity/number of baits applied• details of property and property owner where the bait is laid• location of baits, if applied by the approval holder, should be recorded to allow them to be retrieved, and• the quantity of unused poison, date and the location of surrender. <p>D. A copy of the record must be provided to the landholder.</p> <p>E. Records must be retained for a period of five (5) years.</p>

Appendix 1 - Notice of intent to use Restricted S7 poison

Notice of intent to use Restricted S7 poison for baiting of invasive pest animals

Date:

To:

As a neighbouring landholder I wish to inform you that I intend to:

Prepare and lay:
(type of bait or ejector device and target animal)

Lay traps poisoned with:
(type of bait and target animal)

(Tick whichever is relevant)

The baiting event will occur from to
(Date) (Date)

The address/s at which the baiting will take place is/are:

Please be advised that is a dangerous poison and is highly toxic to both animals and people.

Please ensure children and other persons in your household are restricted from entering the site.

Please ensure steps are taken to keep all domestic and working dogs safe by restraining or muzzling them during this period.

Regards

..... (Sender's signature)

..... (Print name)

..... (Telephone contact details)

Appendix 2 - Record of notifications of intent to use Restricted S7 Poison for invasive animal control log

Name: _____ Address: _____

Baiting program dates	Neighbour's name	Neighbour's property name or address	Distance from neighbour's property to baiting site	Date notified

Appendix 3 – Sample warning sign

WARNING	
DECLARED PEST ANIMAL CONTROL	
Poison baits laid here	
Target animals:	<input type="checkbox"/> Foxes <input type="checkbox"/> Wild dogs <input type="checkbox"/> Rabbits <input type="checkbox"/> Feral pigs <input type="checkbox"/> Feral cats
Poison used:	_____ Material: _____
Date laid:	_____ Contact: _____
Domestic animals and pets can be affected	
<small>Signage is compulsory for all lands where baiting occurs. Signs must be put up immediately before any poisoning operations commence on the property and placed according to specified requirements. Signs must be maintained for at least 4 weeks after the authorised period of bait lay has expired or after all untaken baits have been collected.</small>	

Appendix 4 – Restricted S7 poison incident notification form

Notification to the Chief Executive of Queensland Health

Details of person notifying the incident			
Name of notifier			
Business name		ABN	
Address of notifier			
Position of notifier			
Contact phone		Approval number	
Email address			
Business activity			
Incident details			
Incident type			
<input type="checkbox"/> poisoning or suspected poisoning of a person <input type="checkbox"/> poisoning or suspected poisoning of a domestic animal <input type="checkbox"/> contamination or suspected contamination of agricultural land or livestock <input type="checkbox"/> loss or theft			
Restricted S7 poison type			
<input type="checkbox"/> strychnine <input type="checkbox"/> 1080 <input type="checkbox"/> PAPP <input type="checkbox"/> other (provide details)			
Incident date:	Authorised location address:		
Time of incident:			
Provide a description of the incident including location, who or what was affected, the circumstances of the incident.			
Who did the incident involve? (tick all that appropriate)			
<input type="checkbox"/> Approved person <input type="checkbox"/> employee of Approved person <input type="checkbox"/> person engaged by Approved person <input type="checkbox"/> other (provide details)			
Please submit to the Public Health Unit in your area.			

Glossary

Term	Definition
Approval holder	A person who holds a general approval that authorises dealing with a RS7 poison to control invasive animals.
Approved person	A person authorised under Schedule 2 of the Poisons Regulation.
APVMA	Australian Pesticides and Veterinary Medicines Authority
Authorised officer	An authorised officer appointed under the <i>Biosecurity Act 2014</i> or an authorised person appointed under the <i>Nature Conservation Act 1992</i> who is an approved person under Schedule 2 Part 3 Division 1 or 2 of the Poisons Regulation.
Bait	Food or baiting device (e.g. pest ejector devices or lethal traps) containing a poison intentionally used to attract and kill a pest or an invasive animal.
Baiting event	The preparation and laying of baits during a defined period of time.
Chief Executive	The Chief Executive of Queensland Health
Commercial baiting operators	An approval holder who provides baiting services on a 'fee-for-service' basis.
Container	Means a container that: <ul style="list-style-type: none">• is appropriately labelled• is impervious to the poison it contains• does not chemically or physically react with the poison it contains• can be securely closed and is sufficiently durable to prevent it from breaking or leaking during ordinary handling, transport or storage• can be securely closed and is not, and does not appear to be, a food or drink container.
CPE	Canid Pest Ejector for the purpose of controlling wild dogs, dingoes and foxes. Used in conjunction with capsules containing fluoroacetic acid or PAPP.

Term	Definition
General Approval	<p>As defined in section 68 of the Act:</p> <p>(1) A general approval is an approval that authorises a person to carry out a regulated activity with a regulated substance stated in the approval.</p> <p>(2) A regulation may prescribe different classes of general approvals for carrying out different types of regulated activities.</p>
Immediate container	As defined in Part 1 of the Poisons Standard, includes all forms of containers in which a poison is directly packed but does not include any such container intended for consumption or any immediate wrapper.
Inspector	As defined in the <i>Medicines and Poisons Act 2019</i>
Invasive animals	As defined in Schedule 7, Dictionary of the Poisons Regulation
Landholder	Includes rural landowner or occupier
Licensed waste disposal facility	Waste disposal facility licensed under the <i>Environmental Protection Act 1994</i>
Low-risk fluoroacetic acid bait	<p>As defined in section 10 of the Poisons Regulation</p> <p>Is a poison that is fluoroacetic acid in the form of a bait containing the acid in a concentration of not more than 0.5 grams for each kilogram of the bait</p> <p>*Baits may be in prepared (fresh) or manufactured (shelf-stable) form</p>
Manufactured baits	Baits that are shelf stable and packaged to withstand storage without refrigeration.
Manufacturer's approved label	Product label approved by the APVMA
PAPP	4-aminopropiophenone (para-aminopropiophenone)
Pest	<p>As defined in Schedule 1 of the Act:</p> <p>(a) means an arthropod, bird, mollusc or rodent that injuriously affects, or may injuriously affects, or may injuriously affect —</p> <p>i. a place by transmitting disease, a toxin or another pest in the place or by causing physical damage to the place or a thing in the place; or</p> <p>ii. a person by transmitting disease, a toxin or another pest to the person or by causing distress to, or an adverse physiological or social effect in, the person; but</p> <p>(b) does not include an invasive animal that is restricted matter <i>Biosecurity Act 2014</i>.</p>

Term	Definition
Poisons Standard	As defined in Schedule 1, Dictionary of the <i>Medicines and Poisons Act 2019</i> : the current Poisons Standard within the meaning of the <i>Therapeutic Goods Act 1989 (Cwlth)</i> , section 52A(1)
Prepared baits	Include: <ul style="list-style-type: none"> • Fresh meat baits that are impregnated with a RS7 poison by injection. • Grain or fruit that are impregnated with an RS7 poison by mixing or other means
PPE	Personal Protective Equipment
Records	May be hand-written or electronic
Road	As defined in the <i>Land Act 1994</i>
Restricted S7 poison (RS7 poison)	As defined in section 8 of the Poisons Regulation and listed in Schedule 1 of the Poisons Regulation For the purpose of this Standard, this includes strychnine, PAPP and fluoroacetic acid.
Secure area	As defined in Schedule 7, Dictionary of the Poisons Regulation
Spill kit	May include items such as a bucket of clean and dry sawdust/sand to use on solution spillages, additional PPE, clean containers that are capable of being closed for recovery purposes; and a broom and shovel for the collection and removal of contaminated material

A term used in this Standard that is defined in the *Medicines and Poisons Act 2019* or the *Medicines and Poisons (Poisons and Prohibited Substances) Regulation 2021* and is not referred to in this Glossary, has the meaning stated in the Act or Regulation.