September 2025

Frequently Asked Questions

Changes to the Code of Practice for the Safe Use and Management of Registered Pesticides containing 1080, PAPP and Strychnine

What is the Code of Practice?

In Western Australia (WA), the synthetic toxin 1080 (also known as sodium monofluoroacetate, or sodium fluoroacetate), PAPP (para-Aminopropiophenone, or 4-aminopropiophenone) and strychnine are classified as Schedule 7 (S7) poisons in accordance with the *Medicines and Poisons Act 2014* (the Act).

Due to the human health risks associated with these poisons, there are restrictions on their supply, possession and use. The <u>Code of Practice for the Safe Use and Management of Registered Pesticides Containing 1080, PAPP and Strychnine</u> (the Code), provides practical guidance on the safe and authorised use of these registered pesticides.

Why was the Code revised?

The Code was reviewed and updated to improve clarity and readability to ensure continued compliance with the Act. The revised Code provides a risk management approach to the supply and use of these S7 pesticides.

Much of the advisory information and detail relating to departmental procedures has been removed.

Where will I find the background information that has been removed from the Code?

All the information previously available in the Code is still available in the training modules.

Has the application process for a permit changed?

The application process for a permit to use 1080, PAPP and/or strychnine has not changed. Applicants are still required to successfully complete the online training modules.

Has the training process changed?

The Department of Primary Industries and Regional Development (DPIRD) is currently working to improve documentation and training to align with the new Code. Until these improvements have been completed, the training will remain unchanged.

Can I still get trained during the upgrade process?

When applying for a registered pesticide permit:

- All applicants will be required to have completed the existing training currently available on the <u>DPIRD Progi training website</u>. However, we acknowledge that the current training does not fully align with the new Code.
- All applicants will need to ensure they are familiar with the new Code and that their permit application complies with the new Code.

Which government department is responsible for issuing registered pesticide permits?

The Code and the Section 72 Notices of the Act recognise DPIRD and the Department of Biodiversity, Conservation and Attractions (DBCA) as authorised departments, with each department responsible for:

- the application process
- risk assessment and issuing permits
- investigations
- training
- auditing
- compliance with the Code.

DPIRD manages the issuing of permits for use of 1080, PAPP and strychnine for the purposes of **agriculture and industry protection.**

DBCA manages the issuing of permits for use of 1080, PAPP and strychnine for the purposes of **biodiversity conservation**.

Why are there 2 departments issuing permits?

This is a change from the historic, land tenure-based management responsibilities. It provides clarity for all stakeholders and a better understanding of why there are 2 'Authorised Departments' and the role of each.

However, this demarcation of responsibilities is flexible. For, example, if your permit application is proposing to protect agricultural values on farmland, and biodiversity conservation values within remnant patches of vegetation on your property, you need only submit one application for both purposes. DPIRD will assess applications where both purposes are identified.

How will the training change?

The Code now specifies the competencies (training) required for use of specific products and purposes.

The training for Licensed Pest Management Technicians (LPMTs) is unchanged.

Authorising officers, Authorised officers and Approved users will be required to complete training to achieve the relevant competency for the product(s) and purpose(s) requested on the permit application.

The training now identifies the appropriate competency required for use of the relevant S7 product.

Refresher training for Approved users, Permit holders, Authorised officers and Authorising officers must be undertaken at a minimum of every 5 years to maintain currency.

Refresher training is to ensure all users maintain the required training competency level(s).

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 training program.

Why must the Applicant or Permit holder complete training?

The new Code specifies the Permit holder is responsible for compliance with all conditions of the permit, and as such, is also responsible for compliance by all identified users operating in accordance with the permit.

This condition was introduced to correct the anomaly in previous versions of the Code, whereby the permit holder was not necessarily required to have oversight of the control program.

What has happened to the 'Approved Pastoralist' category?

The former category of user termed 'Approved Pastoralist' has been removed. However, authorisation at this level for users to possess, store, transport and use 1080 concentrate for the non-commercial manufacture of field-prepared baits still exists.

Training in the use of 1080 concentrate will now be provided through DPIRD's online Progi training platform. Eligibility criteria to be authorised to this level of 'Approved user' remains the same, as prescribed in the Section 72 notices.

What permit application form do I use?

The previously named 'Restricted chemical product (RCP) permit application' form has been revised and renamed the 'Registered pesticide permit application' form.

The 'amendment' form and the 'Registered pesticides (RP) permit application - government managed lands' have also been revised and renamed.

There will be a new form for community baiting programs, described below.

Once finalised, the new forms will be available at DPIRD's <u>Registered pesticide permits for pest animal control</u> webpage.

My property is less than 20 ha, can I still apply for a registered pesticide permit to control vertebrate pests?

The new Code has changed the minimum size (area) for landholdings for which a permit will be issued. This has changed from 10 to 20 ha (approximately 49.4 acres).

The rationale for the change included:

- The perimeter to area ratio, and the reinvasion or recruitment of vertebrate pests, increases with decreasing landholding size.
- With an increase to 20 ha, there is a decreased risk to working dogs and pets on neighbouring small holdings.

 For properties less than 20 ha, the Code still encourages control programs, with the control program to be carried out as a community baiting program with a total baiting area of 20 ha or more, comprised of individually owned, but contiguous smaller properties.

The Code also requires such baiting programs on the combined larger area to be carried out as one baiting program, and not in separate sections or properties at different times. In such cases the combined small landholdings will be assessed as one larger property.

• Coordinated programs combining landholdings less than 20 ha will increase the efficacy of the control program.

A new application form will be available for community baiting programs where individual properties less than 20 ha have combined to carry out a baiting program.

For land holdings of less than 20 ha, where a community baiting program cannot be established, other control options will need to be considered. See DPIRD's 'Options for fox control including 1080 baiting' at DPIRD's baits and poisons webpage.

Why do I need to know about risks to non-target species?

The revised Code places greater emphasis on the applicant to identify the presence, or potential presence of, and risk to, non-target native species.

This requires the applicant to have greater awareness of the potential for deaths of non-target, native fauna and requires more than simply ticking a 'check box' as was the requirement previously.

Information on non-target species can be provided by survey results or reports, personal records and sightings, correspondence from local conservation groups, Recognised Biosecurity Groups (RBGs) and DBCA etc.

By increasing awareness and reducing the risk to non-target species, the baiting program will contribute to biodiversity conservation outcomes, maintaining social licence and access to these crucial tools.

Why has the setback for 1080 bait placement from roads changed?

Section 34(4) of the *Dog Act 1976* requires 1080 baits to be setback 20 m from roads. However, this setback is only required when baiting is for the protection of livestock. The Code has taken a conservative approach and when ground baiting with 1080 or PAPP, the setback distance from formed gazetted public roadways is 20 m in all cases.

There is now consistency in the setback from a road when laying a 1080 or PAPP bait when ground baiting for conservation purposes and when ground baiting for protection of livestock.

Why is it that I now don't have to bury 1080 baits?

The Code now identifies when ground baiting, baits should be placed on the surface of the ground, under vegetation or otherwise as approved by the Authorising officer. This is based on the findings from decades of research which has shown surface laid baits are more readily taken by foxes and wild dogs. Surface laid baits will also remain viable longer than buried baits.

How do I protect non-target species?

Laying baits on the ground surface comes with a caveat. Surface laid baits still need to reduce the likelihood of being taken by non-target species. This is achieved by placing baits under vegetation, under leaf litter and away from open spaces.

The option of surface laid baits provides an alternative to label instructions which arbitrarily require burial of ground-laid baits.

Why is there a reduced distance restriction from recreation sites when aerial baiting?

The changed distance restriction from recreation sites is in recognition that the 250 m refers to the radial distance to the edge of the recreation site, which still results in a minimum diameter of 500 m for the non-baited zone centred on the recreation site.

The revised Code has also removed ambiguity as to what is considered a 'recreation site' and has introduced and defined the term 'Constructed recreation site'.

A 'Constructed recreation site' provides services and or facilities for public use for visitation purposes, such as carparks, ablution blocks and tables. This includes interpretation areas and information boards, public reserves and public spaces.

Why am I now required to label all field prepared baits?

The Code specifies that:

- 'All 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 2 lines worded as:

DANGEROUS POISON

Keep out of reach of children

- The minimum additional label requirements must identify the:
 - o bait substrate
 - o toxin used in the prepared bait
 - date of preparation
 - o number of baits in the labelled container
 - o purpose (the target pest species).

This has always been a mandatory requirement but not clearly stated.

More information

Department of Health:

- Notices issued under Section 72 of the Medicines and Poisons Act 2014
- Code of Practice 1080,PAPP and Strychnine
- Stakeholder summary of Code of Practice changes

Department of Primary Industries and Regional Development:

- Baits and poisons
- Registered pesticide permits for pest animal control

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