

# Guidelines for storage of poisons and prohibited substances

October 2022

## Purpose

This document, '*Guidelines for storage of poisons and prohibited substances*', has been prepared to assist authorised users to safely store poisons and prohibited substances under the *Medicines and Poisons Act 2019* (MPA).

## Scope

This document applies to all persons who deal with scheduled poisons and prohibited substances under the Medicines and Poisons (Poisons and Prohibited Substances) Regulation 2021 (the Regulation). Note that this guideline does not apply to the storage of pesticides and fumigants.

## Scheduling of poisons

Poisons are scheduled according to the level of control over their availability required to protect public health and safety. The MPA adopts the Schedules in which they are included under the Commonwealth's Standard for the Uniform Scheduling of Medicines and Poisons (Poisons Standard).

- Schedule 2 (S2) – Pharmacy Medicine
- Schedule 3 (S3) – Pharmacy Only Medicine
- Schedule 4 (S4) – Prescription Only Medicine
- Schedule 5 (S5) – Caution
- Schedule 6 (S6) – Poison
- Schedule 7 (S7) – Dangerous Poison
- Schedule 8 (S8) – Controlled Drug
- Schedule 9 (S9) – Prohibited Substances
- Schedule 10 (S10) – Substances of such danger to health as to warrant prohibition of sale, supply and use.

Under the MPA, S2, S3, S4 and S8 that are not used for therapeutic purposes are treated as a poison.

# Storage methods

## S2, S3, and S4 poisons

Regulated activity or substance authority	Requirements	Recommended storage methods
<b>A. Manufacturing licence</b> <b>B. Wholesale licence</b> <b>C. General approval</b>	Under section 36 of the Regulation, the substance authority holders or persons authorised under their substance authorities (e.g. employees or students), must ensure that S2, S3, and S4 poisons are stored in a way that prevents access by unauthorised persons.	<ul style="list-style-type: none"><li>• S2, S3 and S4 poisons are:<ul style="list-style-type: none"><li>– stored in a secure facility or container, that is always locked, unless accessing the poison for use.</li><li>– the key to the secure facility or container is only accessible by authorised persons.</li><li>– key includes electronic access.</li></ul></li></ul>

## S5 poisons

Under the MPA no substance authority is required for S5 poisons, however persons dealing with these substances are required to follow any storage or usage requirements on the label.

## S6 poisons

Under the MPA no substance authority is required for S5 poisons, however persons dealing with these substances are required to follow any storage or usage requirements on the label.

Regulated activity or substance authority	Requirements	Recommended storage methods
<b>A. Retail sale of S6 poisons</b>	<p>Under section 70 of the Regulation, a person selling an S6 poison by retail must take all reasonable steps to ensure the poison:</p> <ul style="list-style-type: none"> <li>(a) is stored or sold in child-resistant packaging;</li> <li>or</li> <li>(b) is not stored or sold within reach of children under 4 years.</li> </ul>	<ul style="list-style-type: none"> <li>• S6 poisons are stored in a way that complies with the '<i>National guideline for retail storage of Schedule 6 and Schedule 7 poisons</i>', approved by the Australian Health Ministers Advisory Council, with examples below: <ul style="list-style-type: none"> <li>– when displayed, stored at least 1.2 metres above the floor and at least 1.2 metres away from any step, stairway, ramp or escalator to which the public has access; or</li> <li>– stored with a child-resistant closure and/or child-resistant packaging as defined in <i>Part 1 Interpretation of the Poison Standard</i>; or</li> <li>– stored in containers with the capacity of 5 litres or more or a weight inclusive of its contents of 5 kilograms or more; or</li> <li>– the area where an S6 poison is stored is directly supervised or within direct line of sight of a manned service counter where staff can supervise the storage area when customers are present.</li> </ul> </li> </ul>
<b>B. Other users</b>  <b>(no substance authority required under the MPA)</b>	Nil	<ul style="list-style-type: none"> <li>• Compliance with requirements under work health and safety legislation.</li> <li>• Store as per label.</li> </ul>

# S7 poisons

## Non-restricted S7 poisons

Regulated activity or substance authority	Requirements	Recommended storage methods
<p>A. Manufacturing licence</p> <p>B. Wholesale licence</p> <p>C. Retail licence</p>	<ul style="list-style-type: none"> <li>• Under section 64 of the Regulation, the holder of the substance authority for non-restricted S7 poison must:               <ul style="list-style-type: none"> <li>– ensure it is kept in a secure area* unless a person authorised under the substance authority is otherwise dealing with the poison; and</li> <li>– ensure the secure area is locked unless a person authorised under the substance authority accesses the area to otherwise deal with, or record information about, the substance or poison; and</li> <li>– take all reasonable steps to ensure that an unauthorised person only accesses the secure area under supervision by a person who is authorised to deal with the substance or poison.</li> <li>– must comply with requirements stated in any substance management plan for the location or premises.</li> </ul> </li> <li>• If the non-restricted S7 poison is <b>transported in a vehicle</b>, the holder of the substance authority must:               <ul style="list-style-type: none"> <li>– ensure the poison is kept in a secure area of the vehicle unless a person is moving the poison; and</li> <li>– ensure the secure area of the vehicle is kept locked unless a person is accessing the area to move the poison; and</li> <li>– take all reasonable steps to ensure that a person who is not authorised to deal with the poison does not access the secure area of the vehicle.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Non-restricted S7 poisons are:               <ul style="list-style-type: none"> <li>– stored in a locked secure storage facility that is only accessible to the substance authority holder and employees.</li> <li>– stored in bulk storage containers (e.g. an intermediate bulk container that has a security seal) with a volume or weight capacity that precludes manual removal without equipment or vehicles, and</li> <li>– located on a property kept secured to prevent unauthorised vehicular or walk-in access when the premises are not staffed.</li> </ul> </li> <li>• <b>For retailers</b>, the non-restricted S7 may be stored according to the measures outlined in the with the '<i>National guideline for retail storage of Schedule 6 and Schedule 7 poisons</i>', approved by the Australian Health Ministers Advisory Council.</li> <li>• The non-restricted S7 poison is:               <ul style="list-style-type: none"> <li>– stored in an area of the vehicle that is lockable;</li> <li>– kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> </ul>
<p>D. Other users</p>	<ul style="list-style-type: none"> <li>• Non-restricted S7 poisons must be stored in a secure area.</li> <li>• If the non-restricted S7 poison is transported in a vehicle, must be stored in a secure area of the vehicle.</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with requirements under work health and safety legislation.</li> </ul>

\* **Secure area** means an area, or receptacle in an area, that is locked or otherwise designed to prevent access to the area or receptacle by a person who is not authorised to access the area or receptacle. Examples – a padlocked cupboard or chest in a shed; a room that can be accessed only with an electronic code; locked cage in a vehicle; an elevated area that is accessible only by using a forklift requiring a key.

## Restricted S7 poisons

Regulated activity or substance authority	Requirements	Recommended storage methods
<p><b>A. Manufacturing licence</b></p> <p><b>B. Wholesale licence</b></p> <p><b>C. Retail licence</b></p> <p><b>D. General approval</b> (excluding general approval that authorises dealings with a RS7 poison to control invasive animals)</p>	<ul style="list-style-type: none"> <li>• Under section 64 of the Regulation, the holder of the substance authority must:               <ul style="list-style-type: none"> <li>– ensure the substance or poison is kept in a secure area unless a person authorised under the substance authority is otherwise dealing with the substance or poison; and</li> <li>– ensure the secure area is locked unless a person authorised under the substance authority accesses the area to otherwise deal with, or record information about, the substance or poison; and</li> <li>– take all reasonable steps to ensure that an unauthorised person only accesses the secure area under supervision by a person who is authorised to deal with the substance or poison.</li> <li>– must comply with the requirements stated in any substance management plan for the location or premises.</li> </ul> </li> <li>• If the poison is transported in a vehicle, the holder of the substance authority must:               <ul style="list-style-type: none"> <li>– ensure the poison is kept in a secure area of the vehicle unless a person is moving the poison; and</li> <li>– ensure the secure area of the vehicle is kept locked unless a person is accessing the area to move the poison; and</li> <li>– take all reasonable steps to ensure that a person who is not authorised to deal with the poison does not access the secure area of the vehicle.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• RS7 poisons are:               <ul style="list-style-type: none"> <li>– stored in a secure room, a fixed, lockable cupboard or a safe that complies with AS/NZS 3809:1998, ‘safes and strongrooms’ or with similar specifications.</li> <li>– the key or security code to the storage facility or container is only accessible by the approval holder or persons authorised by the approval holder. A key includes any electronic access medium (e.g. security pin code, electronic swipe, finger print).</li> </ul> </li> <li>• For retailers, the non-restricted S7 may be stored according to the measures outlined in the with the ‘National guideline for retail storage of Schedule 6 and Schedule 7 poisons’, approved by the Australian Health Ministers Advisory Council.</li> <li>• The non-restricted S7 poison is:               <ul style="list-style-type: none"> <li>– stored in an area of the vehicle that is lockable;</li> <li>– kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> <li>• RS7 poisons are:               <ul style="list-style-type: none"> <li>– stored in an area of the vehicle that is lockable;</li> <li>– kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> </ul>

Regulated activity or substance authority	Requirements	Recommended storage methods
<p><b>E. General approval that authorises dealings with a RS7 poison to control invasive animals</b></p>	<ul style="list-style-type: none"> <li>• The holder of the substance authority must: <ul style="list-style-type: none"> <li>– ensure the substance or poison is kept in a secure area unless a person authorised under the substance authority is otherwise dealing with the substance or poison; and</li> <li>– ensure the secure area is locked unless a person authorised under the substance authority accesses the area to otherwise deal with, or record information about, the substance or poison; and</li> <li>– take all reasonable steps to ensure that an unauthorised person only accesses the secure area under supervision by a person who is authorised to deal with the substance or poison.</li> </ul> </li> <li>• If the poison is transported in a vehicle, the holder of the substance authority must: <ul style="list-style-type: none"> <li>– ensure the poison is kept in a secure area of the vehicle unless a person is moving the poison; and</li> <li>– ensure the secure area of the vehicle is kept locked unless a person is accessing the area to move the poison; and</li> <li>– take all reasonable steps to ensure that a person who is not authorised to deal with the poison does not access the secure area of the vehicle.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• RS7 poison baiting products include (strychnine, fluoroacetic acid (1080) and para-aminopropiophenone (PAPP)). Storage requirements include: <ul style="list-style-type: none"> <li>– stored in a secure area (e.g. locked box or a locked cabinet within a locked shed) to prevent access by unauthorised persons; and</li> <li>– keys to all storage containers must only be accessible by persons authorised by the approval holder; and</li> <li>– baiting devices containing RS7 poison (i.e. poison ejector devices) must be disarmed or inactivated while in storage; and</li> <li>– must not be stored in a food or drink container or a container that resembles or may be mistaken for a food or drink container; and</li> <li>– fresh meat baits must not be stored for future use.</li> </ul> </li> <li>• RS7 poisons are: <ul style="list-style-type: none"> <li>– stored in an area of the vehicle that is lockable;</li> <li>– kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> </ul>

## High-risk poisons (S8, S9 & S10)

Regulated activity or substance authority	Requirements	Recommended storage methods
<p><b>A. Manufacturing licence</b></p> <p><b>B. Wholesale licence</b></p>	<ul style="list-style-type: none"> <li>• Under section 33 of the Regulation, the holder of the substance authority must:               <ul style="list-style-type: none"> <li>– Unless accessing to deal with the poison, the poison must be kept in a secure area and must be locked; and unauthorised persons must not be allowed access to the area.</li> <li>– Comply with the storage requirement in the departmental standard, <i>'Substance management plans for regulated poisons – version 1'</i>.</li> </ul> </li> <li>• If transported in a vehicle, the high-risk poison must be stored in a secure area of the vehicle.</li> </ul>	<ul style="list-style-type: none"> <li>• High-risk poisons must be:               <ul style="list-style-type: none"> <li>– Located on a property kept secured to prevent unauthorised vehicular or walk-in access; and</li> <li>– Restrict access to the storage area, for example the room can be accessed only with an electronic code or authorised access card.</li> <li>– Storage area is constantly monitored by an alarm system or person located at the premises.</li> </ul> </li> <li>• High-risk poisons must be:               <ul style="list-style-type: none"> <li>– Stored in an area of the vehicle that is lockable;</li> <li>– Kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– Only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> </ul>
<p><b>C. General approval</b></p>	<ul style="list-style-type: none"> <li>• The holder of the substance authority must:               <ul style="list-style-type: none"> <li>– Unless accessing to deal with the poison, the poison must be kept in a secure area and must be locked; and unauthorised persons must not be allowed access to the area.</li> <li>– Comply with the storage requirement in the departmental standard, <i>'Substance management plans for regulated poisons – version 1'</i>.</li> </ul> </li> <li>• If transported in a vehicle, the high-risk poison must be stored in a secure area of the vehicle.</li> </ul>	<ul style="list-style-type: none"> <li>• High-risk poisons must be:               <ul style="list-style-type: none"> <li>– Located on a property kept secured to prevent unauthorised vehicular or walk-in access; and</li> <li>– Restrict access to the storage area, for example the room can be accessed only with an electronic code or authorised access card.</li> </ul> </li> <li>• High-risk poisons must be:               <ul style="list-style-type: none"> <li>– Stored in an area of the vehicle that is lockable;</li> <li>– Kept locked at all times during transport and when the vehicle is stationary; and</li> <li>– Only the driver of the vehicle or authorised persons have access to the key.</li> </ul> </li> </ul>

## More information

- For more information, please visit Department of Health [Environmental Hazards Unit](#)
- Find your Queensland Health [Public Health Unit](#)