Alkaloid Poppies – Risk Management Plan Guidance

December 2016

Important user information

To ensure poppies are safely and securely cultivated and processed in NSW, both growers and processors must develop a plan outlining how they propose to deal with the risks relating to poppy production and comply with the conditions of their licence.

A clear, legible risk management plan must be submitted as part of a licence application or renewal and will be reviewed during the approval process. The plan needs to cover the full range of licenced activities and account for local factors such as proximity to main roads or community facilities. A risk management plan template is provided in the poppy information pack to help growers and processors meet this requirement

Growers should liaise with their processor to complete their risk management plan

A template of the Risk Management Plan can be found at www.dpi.nsw.gov.au

What needs to be included?

A risk management plan must specify items such as:

- who will be responsible for monitoring and acting on identified risks
- who will ensure the plan stays relevant and reflects current and emerging risks

- what steps will be taken to ensure neighbour notification

- what steps will be taken to ensure crop security

- how the entry of unauthorised persons will be managed (trades, utilities)

- how disqualified persons will be excluded from employment

- how employee's will be appropriately trained in understanding the requirements of and their obligations under the risk management plan and licence conditions.
- how to prevent and/or minimise offences being committed by employees under the *Poppy Industry Act 2016*.

- how volunteer poppy plants at cultivation sites and roadsides will be eradicated prior to flowering

- how theft and/or interference to the crop will be monitored and reported to NSW Police

- what security measures will the licensee employ during transit of poppy straw, and what plans will be in place to manage spillages and accidents

Notifying neighbours

It is the responsibility of the cultivation licence holder to ensure that all neighbouring properties bordering the poppy cropping area receive written notification at least one week prior to sowing. Information that must be supplied includes:

- illegal use of the crop can cause death

- unauthorised persons cannot enter the cultivation site unless accompanied by the licence holder or an employee authorised to undertake activities under the licence

- livestock must be excluded from cultivation sites as consumption can cause residues in the meat.

- A suggested notification template, which can be copied as necessary, is available in the poppy information pack.

Special licence conditions for cultivators

- Crop residues must be destroyed within seven days of harvest.

- Any alkaloid poppy plants growing on the cultivation site after harvest must be eradicated prior to flowering.

- A licensed grower must notify the Department of Primary Industry (DPI) within 7 days of any changes to the list of current employees or changes to the risk management plan.

- The specified premises must be fenced or have a physical barrier which prevents access by unauthorised persons.

- Unless a licensed processor or an employee is present on the premises, the premises, including all buildings at the premises, must be securely locked.

Signs must be displayed at all entry points and on the fence or boundary and must:

  - display the words "danger", "prohibited area", "keep out" and "trespassers prosecuted"
  - be at least A3 size
  - be weather resistant
  - be legible.

Standard operating procedures for employees under a cultivation or processing licence

It is recommended that all applicants for a licence prepare documented standard operating procedures (SOPs) and maintain a register of SOPs. SOPs should be:

- clear, concise, comprehensible and readily available to personnel needing them

- numbered, dated and have a title and identity of the position (or role) of the person responsible for the SOP

- include detailed instruction on the subject and a date for the next review of the SOP.

SOPs are intended for internal use by the applicant's employees and will not be subject to approval or registration by DPI as part of the licence application process.

However, where a grower or processor relies on their SOPs in addressing a proposed risk management plan, these aspects of the SOPs may be subject to audit by DPI in its monitoring of compliance with the Act.

Can I alter my risk management plan?

Risk management plans must remain current. The licensed grower or processor may amend their plan at any time, but must resubmit the revised plan for approval to DPI within 7 days.

DPI will not charge a fee for reviewing an amended risk management plan.

Risk Management Plan – guidance

This guidance document provides information on the key areas that need to be considered when completing a Risk Management Plan (RMP).

This guidance document can also be used by licensed businesses to understand the compliance audit model process and why defects are identified during audit.

This guide will help growers and processors write their own Risk Management Plan (RMP) to ensure all security and safety aspects are covered.

Table 1. Risk Management Plan (RMP)

Task	Keys areas to consider
Who within the business or organisation will be responsible for monitoring and actioning identified risks?	The RMP must state a minimum of 2 contacts, a primary and a secondary contact. These contacts must be able to be contacted at any point during production. The contact details must include: • position held in company • telephone • mobile • email

How will the licenced business ensure the risk management plan stays relevant?	The RMP must state the following:
	 • person responsible for updating the RMP
	 • when the RMP will be reviewed
	    o start of every season
	    o immediately after any changes to associates /employees status
	    o after any major infrastructure changes
	
	 Changes to the RMP must be recorded in the document history sheet and sent to the NSW DPI within 7 working days.

Neighbouring properties	• Completed and updated list of neighbouring properties –including names and contacts • Record of notifications sent (method of notification) • Person who will complete notifications • Date of when notification will commence and finish • *Notification date must be received 7 days prior to sowing (not including postage time)*
Unauthorised access to premises	• Type of barriers – be descriptive (example: woven wire with barbed wire top)

	• Types of monitoring – be descriptive
	• Procedure for gates
	• Any notifications that will be displayed
	• Standard Operation Procedures' for unauthorised access
Volunteer poppy plants	• Types of monitoring
	• Frequency of monitoring
	• How will volunteer poppies be eradicated
	• When will volunteer poppies be eradicated
	• Type of poison being used (if any)
	• Title of monitoring sheets
Crop monitoring	• Types of monitoring
	• Frequency of monitoring – peak season and off season
	• Person responsible for security breaches
	• Title of monitoring sheets
	• Standard Operation Procedures' (SOP) for dealing with unauthorised access
Access from unauthorised personnel and 'ad hoc' visitors	• Security measures that will take place
	• Type of supervision
	• Who will supervise visitors
	• Type of access granted
	• Title of records sheets
Disqualified personnel	• The types of identification checks that will be completed by the licensee?
	• What types of checks will occur and when will they be completed?
	• Who will check staff records (full name)?
	• What will happen to staff that is considered not fit for purpose?
Training	• Outline training given to employees – be descriptive
	• Keep training materials readily available
	o Dangers of poppy crops
	o Requirements related to ID certifications
	o Importance of crop security
	o Definitions of authorised and unauthorised personnel
	o Importance of reporting interference and theft
	o Destruction of volunteer poppies
	• Employee identification
	o Information displayed on employee identification card
	o Who must carry identification

	o Where identification card must be stored
	• Dedicated training records – title of training records
Fraudulent behaviour	• Primary contact for breaches of behaviour o fraudulent behaviour should be reported to the police - particularly where it relates to the handling or other dealings in alkaloid poppy materials • Who else will be contacted • Where will entries of fraudulent behaviour be recorded • SOP for investigating fraudulent behaviour

Table 2. Onsite Security – growers and processors

Task	Keys areas to consider
Fencing	• Adequate height to prevent unauthorised access from people or animals • Type of material fence is made out of
Monitoring	• Physical presence on site • Recording devices
Signage	• Types of signs • Distance apart from each other • Location • Examples of signs that are erected

Table 3. Transport

Task	Keys areas to consider
Transport Company	• List of approved transport companies (name, address, contact) • List of drivers approved to transport poppy straw
Transport Security	• What type of security will the transport vehicle have to prevent unauthorised access to poppy straw • How will stray poppy straw be prevented from falling from transport vehicle • What type of spillage / accidence notification will there be? • Who will be reported if a spill or accident occurs? • Who will be notified in the clean up if an accident occurs?

Signage	- Location on transport vehicle - Examples of signs
Records	- Title of record sheet - Distance travelled - Time taken - Route of delivery

For updates go to www.dpi.nsw.gov.au/factsheets