

Pest Control Spraying Fumigation and Chemical Application

Business Name:		ABN:
Business Address:		
Contact Person:	Phone:	Email:

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. WHS Governance, Legal Compliance and Licensing	<ul style="list-style-type: none"> Lack of documented WHS governance for pest control, fumigation and chemical application activities Non-compliance with WHS Act 2011, WHS Regulations and relevant Australian Standards (e.g. AS/NZS for fumigation and pesticide use) Failure to maintain pest management licences, fumigation permits and EPA/environmental approvals Inadequate monitoring of changes in legislation, codes of practice and manufacturer requirements for pesticides and fumigants Poor integration of WHS obligations into contracts, tenders and service level agreements No clear due diligence processes for officers in relation to chemical and fumigation risks Inadequate management of third-party pest control subcontractors and their compliance status 	4A	<ul style="list-style-type: none"> Establish and maintain a WHS management system aligned with WHS Act 2011, WHS Regulations and relevant Australian Standards for pest control and fumigation Implement a legal and other requirements register specific to pest control, disease vector control and fumigation activities, reviewed at least annually Ensure all pest management technicians, fumigators and field supervisors hold valid licences and accreditations as required by state, territory regulators and EPA authorities Embed WHS and chemical safety requirements into all contracts, tenders and procurement documents for pest control and fumigation services Define and document due diligence responsibilities regarding pesticide and fumigant risks, including periodic WHS performance reviews and assurance activities Implement a documented compliance audit program covering licensing, authorisations, SDS currency, storage, transport and record-keeping Formalise pre-qualification and ongoing performance review processes for subcontractors, including verification of licences, insurances and WHS systems 	3H
2. Chemical and Fumigant Procurement, Selection and Approval	<ul style="list-style-type: none"> Procurement of unsuitable, high-toxicity or banned pesticides or fumigants Selection of chemicals that are not fit for purpose for bedbug treatment, soil fumigation or disease vector control Lack of a formal approval process for new products, formulations or application methods Use of chemicals without Australian Pesticides and Veterinary Medicines Authority (APVMA) approval or off-label use without appropriate authorisation Inadequate consideration of environmental persistence, bioaccumulation and impact on non-target species 	4A	<ul style="list-style-type: none"> Implement a formal chemical and fumigant procurement policy requiring verification of APVMA approval, registration and suitability for intended pest control tasks Establish a chemical approval committee or competent person sign-off process before new pesticides, fumigants or formulations are introduced Develop a preferred products list prioritising lower toxicity, least-hazardous and target-specific chemicals for bedbug treatment, general pest control and soil fumigation Require suppliers to provide current SDS (within 5 years) and product labels, and verify that these are compatible with site-specific conditions and client requirements Incorporate environmental and non-target species impact assessment criteria into procurement decisions, including aquatic and pollinator risks Maintain a centralised inventory management system for all pest control chemicals and fumigants, including quantities, expiry dates and storage locations 	2M

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	<ul style="list-style-type: none"> Supplier SDS and technical information not aligned with site conditions or client sectors (e.g. food premises, health care, childcare) 			
3. Chemical and Fumigant Storage, Handling and Security Systems	<ul style="list-style-type: none"> Inadequate storage facilities for toxic, flammable or volatile fumigants and pesticides Lack of segregation between incompatible substances (oxidisers, flammables, corrosives, fumigants) Poor stock control leading to expired, unlabelled or decanted chemicals Unauthorised access to hazardous chemicals by untrained workers, clients, children or members of the public Insufficient ventilation and spill containment in storage areas for fumigation gases and concentrates Failure to maintain up-to-date chemical registers and SDS at all depots and in vehicles 	4A	<ul style="list-style-type: none"> Provide compliant chemical storage facilities designed to meet Australian Standards for dangerous goods and fumigants, including bunding, ventilation and emergency containment Implement a documented chemical storage procedure covering segregation, labelling, decanting controls and maximum allowable quantities Maintain an electronic chemical register linked to SDS, with automatic alerts for expiry and review dates Install physical security controls such as lockable cages, secure vehicles, restricted access rooms and key control systems for high-risk fumigants Conduct periodic storage inspections and internal audits to verify compliance with storage procedures and dangerous goods requirements Prohibit unauthorised decanting and require use of labelled, approved containers for all pest control products and fumigants 	2M
4. Hazard Identification, Risk Assessment and Treatment Protocols	<ul style="list-style-type: none"> Lack of systematic risk assessment for different pest control scenarios (domestic, commercial, health care, food premises, soil fumigation) Inadequate assessment of vulnerable occupants (children, elderly, immunocompromised, pets, livestock) Failure to consider confined spaces, poorly ventilated rooms or structural voids when planning fumigation Overreliance on generic SWMS without site-specific risk controls Inadequate evaluation of bedbug treatment complexity in multi-unit dwellings and hospitality venues Insufficient consideration of cumulative exposure for technicians performing multiple treatments per day 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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5. Competency, Licensing, Training and Instruction	<ul style="list-style-type: none"> • Technicians performing fumigation and chemical application without appropriate qualifications or licences • Inadequate training on specific hazards of fumigants, residual insecticides and disease vector control agents • Lack of competence assessing pest infestation severity and designing safe treatment programs • Poor understanding of label instructions, SDS information and legislative requirements • Infrequent refresher training leading to skill fade in emergency response, spill management and exposure management • No verification of competency for new or high-risk tasks (e.g. fumigation of soils, structural fumigation, bedbug infestation in hotels) 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
6. Exposure Management for Workers and Others	<ul style="list-style-type: none"> • Acute and chronic exposure of technicians to fumigants, insecticides and rodenticides during fumigation applications • Secondary exposure of building occupants, neighbours and the public to residual chemicals or gases • Inadequate exclusion zones and re-entry intervals during fumigation • Lack of health monitoring where required for specific hazardous substances • Inappropriate PPE selection, fit, maintenance or reliance on PPE as the primary control • Failure to identify and manage workers with pre-existing health conditions aggravated by chemical exposure 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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7. Equipment, Plant and Application Technology Management	<ul style="list-style-type: none"> • Failure of fumigation equipment, sprayers, foggers or foamers leading to leaks or uncontrolled release • Inadequate maintenance and calibration of metering devices, pumps and application nozzles • Use of non-compliant or improvised application equipment for soil fumigation or disease vector control • Lack of standardisation and documentation for equipment inspection and test schedules • Inadequate design of vehicle fit-outs for transporting and securing application equipment and gas cylinders • No system to remove from service faulty or contaminated application equipment 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
8. Work Planning, Scheduling and Fatigue Management	<ul style="list-style-type: none"> • Poor planning of pest control runs leading to rushed work, errors in dosage and incomplete risk controls • High workload during peak infestation seasons causing fatigue and reduced vigilance • Inadequate time allocated for inspection, client communication and post-treatment verification • Scheduling of fumigation or baiting treatments at inappropriate times relative to occupancy patterns and cleaning cycles • No formal review of work plans for complex jobs such as soil fumigation, disease vector control campaigns or multi-unit bedbug infestations 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
9. Client, Occupant and Public Communication and Consultation	<ul style="list-style-type: none"> • Misunderstanding by clients or occupants about treatment processes, exclusion zones and re-entry times • Failure to provide adequate pre-treatment and post-treatment 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<p>information on risks, required preparations and follow-up actions</p> <ul style="list-style-type: none"> • Inadequate signage and barricading during fumigation or external insect control activities • Poor management of complaints, concerns or reported health symptoms following treatments • Inability to communicate effectively with culturally and linguistically diverse groups or tenants in multi-occupancy buildings 		[REDACTED]	
10. Transport, Journey and Remote Work Management	<ul style="list-style-type: none"> • Unsafe transport of pesticides, fumigants and gas cylinders in vehicles that are not configured for dangerous goods • Lack of journey management for remote area pest and disease vector control activities • Inadequate emergency response capability during transport incidents or vehicle collisions • Failure to comply with dangerous goods transport requirements where thresholds are exceeded • Technicians working alone in remote properties, farms or large facilities without reliable communication 		[REDACTED]	2M
11. Environmental Protection and Non-Target Species Management	<ul style="list-style-type: none"> • Contamination of soil, waterways or stormwater systems from spills, overspray or improper disposal • Unintended harm to non-target species including pets, livestock, beneficial insects and native fauna • Use of broad-spectrum insecticides leading to ecological imbalance and secondary pest outbreaks • Inadequate controls for disease vector control campaigns near sensitive ecosystems 	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> Poor decontamination and waste management of containers, wash-down water and fumigation residues 		[REDACTED]	
12. Emergency Preparedness and Incident Response (Chemical and Fumigation)	<ul style="list-style-type: none"> Unplanned release of fumigant gas due to equipment failure or structural leakage Inadequate emergency response planning for exposure incidents, fires or major spills Lack of readily accessible and understood emergency information for workers and first responders Insufficient practice of emergency drills for fumigation scenarios in occupied buildings or large facilities Failure to coordinate with emergency services regarding high-risk fumigation operations 	4A	[REDACTED]	2M
13. Contractor, Labour Hire and Third-Party Management	<ul style="list-style-type: none"> Use of subcontractor or labour hire pest controllers without adequate WHS systems or fumigation competencies Poor coordination of multiple contractors on shared worksites leading to overlapping exclusion zones and conflicting activities Lack of clarity regarding WHS responsibilities, supervision and incident reporting for contractors Inconsistent application of treatment protocols and documentation standards across different service providers 	3H	[REDACTED]	2M
14. Information Management, Documentation and Record-Keeping	<ul style="list-style-type: none"> Incomplete or inaccurate treatment records for fumigation, soil treatment, bedbug interventions and disease vector control Loss of historical infestation and treatment data, leading to ineffective repeat treatments and misjudged risks 	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> • Inability to demonstrate compliance to regulators, clients or courts due to poor record-keeping • Lack of traceability for specific products, batch numbers and application sites in the event of a product recall or incident 		[REDACTED]	
15. Continuous Improvement, Monitoring and Review	<ul style="list-style-type: none"> • Failure to learn from incidents, near misses and health complaints associated with pest control activities • No systematic review of control effectiveness for fumigation and chemical application risks • Inadequate performance indicators for WHS outcomes in pest and disease vector control operations • Lack of worker consultation on practical issues with procedures, equipment and exposure management 	3H	[REDACTED]	1L

SAMPLE

EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2011
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

Victoria

Occupational Health and Safety Act 2004
 Occupational Health and Safety Regulations 2017
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

New South Wales

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2025
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/list-codes-of-practice>

Western Australia

Work Health and Safety Act 2020
 Work Health and Safety Regulations 2022
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-practice>

Safe Work Australia Links

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

South Australia

Work Health and Safety Act 2012 (SA)
 Work Health and Safety Regulations 2012 (SA)
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

Tasmania

Work Health and Safety Act 2012
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012
 Work Health and Safety Regulations 2012
 Work Health and Safety (Transitional) Regulations 2012
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.