NATIONAL CODE OF PRACTICE FOR CHEMICALS OF SECURITY CONCERN

I am storing it for a friend.

No, I want to pay cash for these chemicals.

I am just stocking up in case I run out.

Why do you need to know what I am using it for?

I know it's a lot of fertiliser, what's it to you?

An Australian Government's initiative in partnership with industry

Acknowledgements

The National Code of Practice for Chemicals of Security Concern has been developed by Australian governments in partnership with industry.

In 2008 a report endorsed by the Council of Australian Governments recommended that governments take action to assess, and where necessary, take action to reduce the risk of chemicals being used for terrorist purposes.

An intergovernmental agreement that sets out the process for this work, including the need for strong government and industry collaboration, was signed by the then Prime Minister, State Premiers and Chief Ministers of the two Territories.

This code of practice is one step that Australian governments - in partnership with industry - have taken to improve the security around chemicals, inform industry about the national security risks associated with the chemicals they handle, and to enhance the measures that industry has in place to prevent, detect and deter terrorist use of chemicals.
NATIONAL CODE OF PRACTICE FOR CHEMICALS OF SECURITY CONCERN
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</tbody>
</table>
A responsibility of government is to provide a safe and secure Australia – by protecting its people and interests from overseas and home-grown terrorism. Terrorists continue to seek access to chemicals to manufacture homemade explosives.

You can assist in reducing the vulnerabilities to your business—and the wider Australian community—by taking time to review your preparedness to deal with theft or diversion of chemicals and by putting simple security measures in place.

Good security planning can enhance your business and contribute to a stronger and more resilient Australia.

Australian governments—Federal and State—have worked collaboratively with industry to assess the national security risks associated with 96 chemicals of security concern, and to develop this code of practice which is designed to keep our chemicals from falling into the wrong hands.

Australian governments support this initiative and encourage businesses to adopt the security measures in this code to help prevent chemicals from falling into the wrong hands.

Everyone is encouraged to report any suspicious behaviour to the National Security Hotline on 1800 1234 00.
Introduction

i. A large and diverse number of industrial, agricultural and veterinary chemicals are legitimately used by individuals and organisations every day throughout Australia.

ii. However, a small percentage of these chemicals have been diverted from their lawful use to other unlawful purposes, including terrorist related activity. The Council of Australian Governments (COAG) has identified 96 chemicals of security concern.

iii. Terrorist organisations continue to show interest in chemicals that can be used to produce explosive or toxic weapons. Common chemicals have been used as ingredients in powerful improvised explosive devices (IEDs) in different parts of the world, resulting in many fatalities, injuries, and damage on a massive scale. Similarly, toxic chemicals have been used in attacks by terrorists to cause injury and death.

iv. This code applies to the 11 precursor chemicals to homemade explosives, the first of 96 chemicals of security concern to undergo the risk assessment process.

v. In Australia, there is a need for increased security around chemicals as the threat of terrorism is expected to continue into the foreseeable future. In fact, security is now viewed as a fundamental part of good business management and should be part of an organisation’s culture, and integrated into its philosophy, practices and plans.

vi. Australian governments and industry are working together to minimise the risks associated with unlawful use of these chemicals to ensure public safety and national security. A key challenge is to improve the security of these chemicals while ensuring they remain available for their legitimate use by consumers and industry.

vii. Australia’s security environment is dynamic and it is vital to the safety of all Australians that persons involved in the manufacture, importation, transportation, sale and use of chemicals report any unusual behaviour regarding the sale and/or use of chemicals to the National Security Hotline on 1800 1234 00.

viii. The following information is provided to assist companies and individuals that manage or handle chemicals of security concern to secure their chemicals and reduce the likelihood that they will be diverted for misuse for terrorist or criminal activities.

ix. All businesses that handle chemicals of security concern should consider the risk of terrorism in their security planning processes. This includes seeking out government information about the current security context and being prepared to respond quickly to an increase in alert levels.

x. Peak bodies and associations are also encouraged to tailor the security risk management information in this code to meet any vulnerabilities faced by businesses, and to disseminate and promote information.
Appendix A lists 96 chemicals of security concern. Appendix B lists sources of additional information including where to obtain information about the current security context and security risk assessment information to inform your own risk assessment. Appendix C contains additional resources.

Australia uses the National Terrorism Public Alert System to communicate the assessed risk of terrorist threat to Australia. The four levels; are:

- **low** – terrorist attack is not expected
- **medium** – terrorist attack could occur
- **high** – terrorist attack is likely
- **extreme** – terrorist attack is imminent or has occurred.

The Australian Government, in consultation with the States and Territories, periodically reviews the public alert level. Businesses are encouraged to seek more information about the National Terrorism Public Alert System, including the current public alert level, by accessing: www.nationalsecurity.gov.au.
Objectives

1. The objectives of this code are to promote effective chemical security management practices throughout the chemical supply and use chain, and in particular to:

   - Protect against the diversion of chemicals for terrorist or criminal purposes.
   - Encourage cooperation between businesses and organisations that handle chemicals and law enforcement agencies on chemical security matters.
   - Educate and train staff to be alert to warning signs and report suspicious behaviours.

2. To achieve these objectives, the code provides guidance and information on a range of practical security measures that businesses and individuals can take.
### Application of this code

3. This code applies to any quantity of 11 chemical precursors to homemade explosives, including chemical products containing these 11 chemicals, at concentrations set out in the table below.

4. There is a broader list of 96 chemicals of security concern at Appendix A. Refer to the chemical security website—www.chemicalsecurity.gov.au—for further information on how the code applies to these chemicals, including details on relevant concentrations and common uses of these chemicals.

5. Businesses involved in the supply chains of these chemicals are encouraged to consider adopting relevant measures from the following security risk management information.

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Concentration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammonium perchlorate</td>
<td>a. in aqueous solution containing 10% or higher of ammonium perchlorate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Hydrogen peroxide</td>
<td>a. in aqueous solution at any concentration; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 15% or higher.</td>
</tr>
<tr>
<td>Nitric acid</td>
<td>at a concentration of 30% or higher</td>
</tr>
<tr>
<td>Nitromethane</td>
<td>at a concentration of 10% or higher</td>
</tr>
<tr>
<td>Potassium chlorate</td>
<td>a. in aqueous solution containing 10% or higher of potassium chlorate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Potassium nitrate</td>
<td>a. in aqueous solution containing 10% or higher of potassium nitrate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Potassium perchlorate</td>
<td>a. in aqueous solution containing 10% or higher potassium perchlorate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Sodium azide</td>
<td>at a concentration of 95% or higher</td>
</tr>
<tr>
<td>Sodium chloride</td>
<td>a. in aqueous solution containing 10% or higher sodium chloride; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Sodium perchlorate</td>
<td>a. in aqueous solution containing 10% or higher sodium perchlorate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
<tr>
<td>Sodium nitrate</td>
<td>a. in aqueous solution containing 10% or higher sodium nitrate; or</td>
</tr>
<tr>
<td></td>
<td>b. in a form other than aqueous solution, at a concentration of 65% or higher.</td>
</tr>
</tbody>
</table>

DRAFT
Security risk management

Assess and treat the security risk

Security risk management is a normal part of good business practice. It should be part of business culture and integrated into its philosophy.

6. The treatment of security threats will be specific to your business and may include a combination of measures. You should:

- Identify the security gaps – find out where chemicals could be lost or diverted from your business and find their way into the wrong hands
- Treat the risks – apply the control measures relevant to you to protect against loss and diversion of chemicals.

Make someone responsible

7. One person should be assigned responsibility for security management. Their role is to:

- Introduce and maintain security measures based on threat and risk (more advice below) and ensure compliance with relevant legislation
- Establish relationships with government agencies and others (where applicable) to address security issues, including regularly obtaining information on alert levels and risks relevant to the operating environment
- Promote the company security policy and procedures
- Develop and manage reporting systems
- Assist in raising employee security awareness
- Include security in employee and contractor training
- Arrange for training, and exercise their security plans, including participating in government and/or police exercises relating to chemical security
- Ensure suspicious incidents and security breaches are investigated and reported
- Coordinate emergency response activities
- Periodically assess and review the company security program
Investigate and report security breaches and suspicious behaviour

8. All suspicious incidents and security breaches should be investigated and, if necessary, reported to the National Security Hotline on 1800 1234 00 and government agencies. Examples include:

- Attempts to purchase chemicals for no clear purpose, with cash, or with identification that appears fraudulent
- Doors not secured, holes in fences, signs of illegal entry
- Unauthorised entry into restricted areas
- Unexplained signs of vehicle activity in restricted or remote access points
- Unexplained requests for technical information about a facility
- Major unexplained process upsets
- Unexplained losses of containment of chemicals
- Unexplained losses of chemicals
- Major cyber attack on internal process controls or inventory systems
9. The following table sets out a series of recommended security measures along with the industry sectors where such measures are most likely to be relevant. The suggested actions cover a wide range of situations and may not be practicable or necessary in all situations. You will need to select and apply control measures relevant to you.

<table>
<thead>
<tr>
<th>Measure</th>
<th>Objective / suggested actions</th>
<th>Relevant to</th>
</tr>
</thead>
</table>
| Employee and contractor checking | **Objective** Limit terrorist access to chemicals of security concern by acquisition through a trusted insider.  
**Suggested actions**  
☑ Basic background checking prior to and during employment  
☑ Verify identity and referee information and follow up on anomalies  
☑ Check criminal history  
☑ Educate staff on security issues and controls | Manufacturer, Importer, Processor, Transport/Logistics, Wholesaler, Retailer, End User (Business) |
| Personnel security awareness     | **Objective** Support other proposed measures by ensuring personnel are aware of the chemical security risks facing the business or organisation.  
**Suggested actions**  
☑ Educate staff on potential mis-use of chemicals being handled in induction and ongoing training and provide clear instructions for reporting suspicious activity | Manufacturer, Importer, Processor, Transport/Logistics, Wholesaler, Retailer, End User (Business) |
## Security measures continued

<table>
<thead>
<tr>
<th>Measure</th>
<th>Objective / suggested actions</th>
<th>Relevant to</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Inventory control measures</strong></td>
<td></td>
<td>Manufacturer, Importer, Processor, Wholesaler, Retailer, End User (Business)</td>
</tr>
<tr>
<td><strong>Objective</strong></td>
<td>It will be possible to determine whether chemicals of security concern have been stolen, misplaced or otherwise diverted.</td>
<td></td>
</tr>
<tr>
<td><strong>Suggested actions</strong></td>
<td></td>
<td>Set up an inventory control system that:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Identifies chemicals of security concern</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Shows the location of such chemicals</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Specifies the amounts of each chemical being received, removed or in stock</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Includes regular reconciliation of amounts</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Reports all theft or unaccounted losses</td>
</tr>
<tr>
<td><strong>Receipt of chemical</strong></td>
<td></td>
<td>Manufacturer, Importer, Processor, Transport/ Logistics, Wholesaler, Retailer, End User (Business)</td>
</tr>
<tr>
<td><strong>Objective</strong></td>
<td>Businesses and organisations can detect if chemicals of security concern have been stolen or otherwise diverted prior to receiving the product, and, to allow reporting to a relevant authority as soon as possible.</td>
<td></td>
</tr>
<tr>
<td><strong>Suggested actions</strong></td>
<td></td>
<td>Institute a system that reconciles quantities ordered with actual product received</td>
</tr>
<tr>
<td><strong>Theft and diversion procedures</strong></td>
<td></td>
<td>Manufacturer, Importer, Processor, Transport/ Logistics, Wholesaler, Retailer, End User (Business)</td>
</tr>
<tr>
<td><strong>Objective</strong></td>
<td>Businesses and organisations consider the individual risk of chemicals of security concern being stolen or otherwise diverted and plan steps to reduce the likelihood of these events occurring.</td>
<td></td>
</tr>
<tr>
<td><strong>Suggested actions</strong></td>
<td></td>
<td>Produce a theft and diversion plan (a set of rules and procedures on personnel and physical access, staff training and reporting)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Nominate a responsible person for implementing and reviewing the plan</td>
</tr>
<tr>
<td>Measure</td>
<td>Objective / suggested actions</td>
<td>Relevant to</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
<td>--------------------------------------</td>
</tr>
</tbody>
</table>
| Physical access         | **Objective** To restrict physical access to chemicals of security concern to reduce the likelihood of them being stolen or otherwise diverted.  
  **Suggested actions**  
  - Install deterrent signage  
  - Install security fencing or walls  
  - Install lights  
  - Install controlled access gates  
  - Design the facility so:  
    - unescorted visitors can be easily noticed  
    - there are limited access points  
    - chemicals are kept in locked and secure areas  
    - vehicle access is controlled and logged  
  - Require visitors to sign in  
  - Use employee and visitor photo ID badges  
  - Control access to keys to secure areas  
  - Employ security staff | Manufacturer, Importer, Processor, Transport/Logistics, Wholesaler, Retailer, End User (Business) |
| Personnel access        | **Objective** To limit access to chemicals of security concern to persons who have a legitimate need to access to them and reduce the likelihood of them being stolen or otherwise diverted.  
  **Suggested actions**  
  - Restrict access to authorised personnel  
  - Always escort or monitor visitors and contractors | Manufacturer, Importer, Processor, Wholesaler, Retailer, End User (Business) |
| Point of sale procedures| **Objective** To adopt practices that limit opportunities for the acquisition of chemicals for terrorist or criminal use through direct purchase from the business.  
  **Suggested actions**  
  - Only sell to customers with known identity and verified legitimate use  
  - Only sell by credit card or on account  
  - Record a form of customer identification (e.g. via end-user declaration or similar system – see template declarations at Appendix C) and retain for two years  
  - Report suspicious transactions (including unusual or different sales to account customers). See Appendices E, F and G for guides to detecting suspicious behaviour | Manufacturer, Importer, Processor, Wholesaler, Retailer |
### Security measures continued

<table>
<thead>
<tr>
<th>Measure</th>
<th>Objective / suggested actions</th>
<th>Relevant to</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sale and distribution procedures</strong></td>
<td><strong>Objective</strong>&lt;br&gt;Orders will only be delivered to persons who have legitimately purchased the chemical.</td>
<td>Manufacturer, Importer, Processor, Wholesaler, Retailer</td>
</tr>
<tr>
<td></td>
<td><strong>Suggested actions</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Only sell to customers with known identity and verified legitimate use. See Appendix C for where to obtain end user declarations.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Only sell by credit card or on account</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Record a form of customer identification</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Report suspicious transactions (including unusual or different sales to account customers). See Appendices E, F and G for guides to detecting suspicious behaviour</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Do not leave chemicals unattended at point of delivery</td>
<td></td>
</tr>
<tr>
<td><strong>Transporting chemicals of security concern procedures</strong></td>
<td><strong>Objective</strong>&lt;br&gt;To have effective physical security and inventory control processes to reduce the likelihood of chemicals of security concern being accidentally or deliberately delivered to or stolen by terrorists or their associates during transport.</td>
<td>Manufacturer, Importer, Processor, Transport/Logistics, Wholesaler, Retailer, End User (Business)</td>
</tr>
<tr>
<td></td>
<td><strong>Suggested actions</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Ensure chemicals are secure at all times during transport</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Do not leave vehicles unattended</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Use secure parking for loads in transit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Monitor the location of vehicles which transporting chemicals</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Record quantities of chemical during loading and unloading</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Implement a system to confirm deliveries of correct amounts with security intact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Ensure chemicals are only supplied to the correct recipient</td>
<td></td>
</tr>
</tbody>
</table>
Supply chain security
Verify that all customers are legitimate

10. Product stewardship requires effective management of the risks associated with chemical products throughout the chemical life cycle. Particular emphasis is placed on maintaining dialogue with customers and chemical recipients.

11. Good security processes include conducting a close assessment of sales of chemicals of security concern and establishing the bona fides of customers. A discussion with customers about the security arrangements and safe storage of purchased chemicals will also contribute to the security of chemicals.

12. Partner with supply chain partners to share safety and security advice, expertise, resources and to foster awareness of chemical security.
APPENDIX A  96 CHEMICALS OF SECURITY CONCERN

Aldicarb
Aluminium phosphide
Ammonia (anhydrous)
Ammonium nitrate*
Ammonium perchlorate
Arsenic pentoxide
Arsenic trioxide
Arsine
Azinphos methyl

bendiocarb
beryllium sulfate
bromine

Cadusafos
Calcium cyanide
Carbofuran
Carbon disulphide
Carbon monoxide
Chloropicrin
Chlorfenvinphos
Chlorine
Cyanogen bromide
Cyanogen chloride
Diazinon
Dichlorvos
Diethyl phosphite
Dimethyl phosphite
Dimethyl mercury
Dimethyl sulfate
Disulfoton
Endosulfan
Ethion
Ethyl mercury chloride
Ethylidethanolamine
Fenamiphos
Fluorine gas
Fluoroacetic acid
Fluoroethyl alcohol
Fluoroethyl fluoroacetate
Hydrochloric acid
Hydrogen chloride
Hydrogen cyanide
Hydrogen peroxide
Hydrogen sulfide
Magnesium phosphide
Mercuric chloride
Mercuric nitrate
Mercuric oxide
Mercurious nitrate
Mercury cyanide
Methamidophos
Methidathion
Methiocarb
Methomyl
Methyl fluoroacetate
Methylidethanolamine
Mevinphos
Nitric acid
Nitric oxide
Nitromethane
Ome-thoate
Osmium tetroxide
Oxamyl
Paraquat
Parathion methyl
Perchloric acid
Phorate
Phosgene
Phosphine
Phosphorus
Phosphorus oxychloride
Phosphorus pentachloride
Phosphorus trichloride
Potassium cyanide
Potassium nitrate
Potassium perchlorate
Propoxur
Sodium azide
Sodium chlorate
Sodium cyanide
Sodium fluoroacetate
Sodium perchlorate
Sodium nitrate
Strechnine
Sulfur dichloride
Sulfur monochloride
Sulphuric acid
Terbufos
Thallium sulfate
Thionyl chloride
Thiophosphoryl chloride
Triethanolamine
Triethyl phosphate

* Security-Sensitive:
Ammonium Nitrate (SSAN) [ammonium nitrate, ammonium nitrate emulsions and ammonium nitrate mixtures containing greater than 45 per cent ammonium nitrate, excluding solutions]
APPENDIX B SOURCES OF ADDITIONAL INFORMATION

**Chemical Security website:** [www.chemicalsecurity.gov.au](http://www.chemicalsecurity.gov.au)

This provides information on a range of chemical security matters, including security risk assessment information to inform your own risk assessment.

**Attorney-General’s Department national security website** [www.nationalsecurity.gov.au](http://www.nationalsecurity.gov.au)

This provides national security context, including information about the National Terrorism Public Alert System

**National Security Hotline:** 1800 1234 00 or hotline@nationalsecurity.gov.au


Fertilizer Industry Federation of Australia Security Guidelines for Agricultural distributors:
The following end user declarations are provided to assist businesses to keep records of transactions involving chemicals of security concern. They could be used:

- On a per-transaction basis
- On a per customer basis (particularly for new and cash customers) or
- When the sales person feels that suspicious indicators are present

It is suggested that businesses keep completed declarations for two years.

Businesses are reminded to report suspicious incidents to the National Security Hotline on 1800 1234 00 or hotline@nationalsecurity.gov.au.
END-USER DECLARATION – EXAMPLE FORMAT FOR COMPANIES

The chemical product I wish to purchase is a chemical of national security concern. I understand that to be supplied this product, a signed end-user declaration must be provided together with an order on identifiable company stationery.

<table>
<thead>
<tr>
<th>Catalogue No.</th>
<th>Product Name</th>
<th>Quantity</th>
<th>Pack size</th>
<th>Order No.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

INTENDED USE:

Please specify details of intended use of the chemical product.

________________________________________

PRODUCT DETAILS AND DECLARATION

I, ____________________________ being ____________________________ on behalf of
(full name) (position)

Address ____________________________________________ (company or institution)

Account No (ACN No) ____________________________ ACN No) declare that the above chemical product will be used for the identified legitimate purpose and any remaining chemicals will be disposed of in a responsible way.

Signature ____________________________ Date __________

DETAILS OF COLLECTING AGENT’S IDENTIFICATION

Current Photograph Identification No* ____________________________ Expiry Date __________
(driver licence or other photo ID*)

END-USER DISTRIBUTOR/SUPPLIER DETAILS AND DECLARATION

I, ____________________________ being ____________________________ on behalf of
(full name) (position)

Address ____________________________________________ (company or institution)

Account No (ACN No) ____________________________ (ACN No) declare that the above chemical product will be used for the identified legitimate purpose.

Signature ____________________________ Date __________

*Please attach a photocopy of current photographic identification
END-USER DECLARATION –
EXAMPLE FORMAT FOR PRIVATE INDIVIDUALS

The chemical product I wish to purchase is a chemical of national security concern. I understand that to be supplied this product, a signed end-user declaration must be provided together with an order/purchase.

<table>
<thead>
<tr>
<th>Catalogue No.</th>
<th>Product Name</th>
<th>Quantity</th>
<th>Pack size</th>
<th>Order No.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

INTENDED USE:
Please specify details of intended use of the chemical product

____________________________________________________

____________________________________________________

____________________________________________________

END-USER DECLARATION

I, ________________________________ of ________________________________,
Current Photograph Identification No (driver licence or other photo ID* ________________________________
Expiry Date ________________________________ sort of ID ________________________________
declare that the above chemical product will be used for the identified legitimate purpose and any remaining chemicals will be disposed of in a responsible way.

Signature ________________________________ Date ________________________________

*Please attach a photocopy of current photographic identification
INTERNAL COMPLIANCE CHECKLIST – SAMPLE FORMAT

Code of Practice for chemicals of security concern

The following elements need to be considered and appropriately implemented to ensure internal compliance with this code:

- Senior management commitment obtained
- Responsible person(s) appointed
- Sales monitoring procedures implemented
- Record-keeping procedures implemented
- Notification of suspicious order and/or enquiries procedures implemented
- Storage procedure implemented
- Education and training procedure implemented
- Code of practice integrated to internal management systems and procedures
- Regular review period established

Authorised by ____________________________

Date ____________________________
Detected suspicious behaviour: A guide for retailers

A customer enquiries about a product containing a precursor chemical to homemade explosives

Consider the following:

- Does the customer appear nervous?
- Are they familiar with the product?
- Does their story make sense?
- Are they purchasing a large amount?
- Is the chemical concentration appropriate for their purpose?
- Are they paying cash?
- Anything unusual for online purchases?

Ask the customer:

- Why do you want the product?
- Do you know how to use it?

Make the sale:

- Consider asking for end-user declaration

If something doesn’t feel right, take notes on:

- What they looked like
- What they were buying
- How much they were buying
- What made the sale suspicious
- What they touched in the store
- What vehicle they were driving
- If any identification was used
- If they paid cash, keep it aside
- For online sales, keep a copy of the order including payment method

Report to the National Security Hotline on

1800 1234 00

or hotline@nationalsecurity.gov.au
Detecting suspicious behaviour:
A guide for businesses that wholesale or store chemicals

Suspicous behaviour is anything that just does not feel right – trust your intuition

Consider the following suspicious indicators:

- Is an unknown company trying to make an order?
- Is their ordering pattern irregular or unusual in terms of timing or quantities ordered?
- Do they display a lack of business acumen and absence of standard business stationary?
- Are they reluctant to supply a written order?
- Are they ordering or purchasing chemicals for which they have no obvious need? Are they indicating an intended use that is inconsistent with the chemicals ordered?
- Have they provided an implausible story about the use for the chemical?
- Are they ordering more than one precursor chemical?
- Are they purchasing in small containers even when industrial use is claimed?
- Are they offering to pay an excessive price for rapid delivery?
- Are they unwilling to supply a telephone number or an address?
- Are they requesting delivery to a post office box or similar?
- Does the person appear to have no clear business motive for making enquiries about the chemicals/products?
- Has the alarm system activated after hours for no apparent reason?

Theft indicators

- Is the person asking lots of questions about chemicals or browsing chemical locations without buying anything?
- Are there occupied vehicles in the vicinity for no apparent reason?
- Are they providing unusual delivery instructions?
- Is the order being collected with the purchaser’s private vehicle?
- Have they parked their vehicle an unreasonably long distance away?
- Are the vehicles parked in an unreasonably long distance away?

If something doesn’t feel right, note down as much detail as possible on:

- What they looked like
- What they were buying
- How much they were buying
- What made the sale suspicious
- What they touched while on the premises
- What vehicle they were driving
- What, if any, identification was used
- If they paid cash, keep it aside
- For online sales, keep a copy of the order including payment method
- Other: vehicle registration, chemical quantities, any identification used, what they said about the intended use and any information they sought.

EVERY LITTLE DETAIL HELPS

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Consider the following suspicious indicators:

- Is the load being delivered from business to consumer instead of business to business?
- Is the load being delivered to a consumer that the transport operator does not know?
- Does the ordered amount depart from normal quantities ordered?
- Is the delivery address suspect? For example, is there a commercial quantity of chemical being delivered to a residential address?
- Is anyone showing an unusual interest in routes, schedules or security arrangements (an insider or other)?
- Is anyone showing an unusual interest in the truck while it’s being loaded/unloaded (an insider or other)?

If something doesn’t feel right, take notes on:

- What the recipient looked like
- What the recipient was receiving
- How much the recipient was receiving
- What made the delivery suspicious
- What vehicle the recipient was driving
- Any comments they made about the intended use
- If any identification was used by the recipient
- Detail of conversation with anyone displaying unusual interest

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