

1080 Victorian Code of Practice

for the Preparation of Perishable
1080 Pest Animal Bait Products
(Using 1080 Aqueous Solution)



© The State of Victoria Department of Jobs, Precincts, and Regions 2019

Acknowledgement

Victorian Department of Health

Photo credits

Image courtesy of Animal Control Technologies (Australia) Pty Ltd

Accessibility

If you would like to receive this publication in an alternative format, please telephone the Customer Service Centre on 136 186, email customer.service@agriculture.vic.gov.au. This document is also available on the internet at www.agriculture.vic.gov.au/1080.

Disclaimer

This publication may be of assistance to you but the State of Victoria and its employees do not guarantee that the publication is without flaw of any kind or is wholly appropriate for your particular purposes and therefore disclaims all liability for any error, loss or other consequence which may arise from you relying on any information in this publication.

Contents

Glossary	ii
1. Introduction	1
1.1 Context of this Code of Practice	1
2. Authorisation to Manufacture and Supply Perishable 1080 Pest Animal Bait Products (prepared using 1080 Aqueous Solution)	2
2.1 Requirements of manufacturers of perishable 1080 pest animal bait products	2
2.2 Additional requirements of manufacturers of perishable 1080 pest animal bait products who manufacture from a mobile facility	4
2.3 Additional requirements of manufacturers of perishable 1080 pest animal bait products who lay bait on behalf of a land manager or owner	5
3. Legislation Affecting the Manufacture, Supply, Transport, Storage and Use of Perishable 1080 Pest Animal Bait Products	6
3.1 Commonwealth Legislation	6
3.2 State Legislation	6
4. Manufacturing Facilities	8
4.1 Requirements of manufacturers of perishable 1080 pest animal bait products who manufacture from a mobile facility	8
5. Storage and Transport	10
5.1 Storage	10
5.2 Transport	10
6. Safety Directions	11
7. Manufacture of Perishable 1080 Pest Animal Bait Products Using APVMA Registered 1080 Aqueous Solution	12
7.1 Product label	12
8. Preparation of Meat and Liver Bait	13
8.1 Equipment/ingredients	13
8.2 Procedure for the preparation of meat bait	13
8.3 Procedure for the preparation of liver bait	14
9. Preparation of Carrot Bait	15
9.1 Equipment/ingredients	15
9.2 Procedure for the preparation of carrot bait	15
10. Containers and Labelling of Perishable 1080 Bait	16
11. Cleaning, Spills and Disposal	17
12. Accident and Incident Reporting	17
13. Record Keeping	17
14. Work Health and Safety	17
15. Review	17
16. Further Information	18

Glossary

1080 ('ten eighty')	Compound sodium fluoroacetate – an active constituent used to make poison bait products for the control of vertebrate pest animal species.
----------------------------	--

1080 Aqueous Solution	Also referred to as 1080 Liquid Concentrate. A concentrate used to prepare 1080 pest animal bait products. This concentrate is registered with the Australian Pesticides and Veterinary Medicines Authority and is only available to manufacturers of 1080 pest animal bait products.
------------------------------	---

1080 endorsement	An endorsement to the Agricultural Chemical User Permit which authorises the 1080 endorsed Agricultural Chemical User Permit holder to purchase and use Australian Pesticides and Veterinary Medicines Authority registered and permitted 1080 pest animal bait products. The endorsement is obtained by successfully completing the <i>Course in Minimising Risks in the Use of 1080 & PAPP Bait Products for Vertebrate Pests</i> .
-------------------------	---

1080 pest animal bait products	Products containing sodium fluoroacetate (1080) that are registered with the Australian Pesticides and Veterinary Medicines Authority or perishable bait products made using 1080 Aqueous Solution and supplied under permit from the Australian Pesticides and Veterinary Medicines Authority.
---------------------------------------	---

ACUP	Agricultural Chemical User Permit – a permit issued under the <i>Agricultural and Veterinary Chemicals (Control of Use) Act 1992</i> authorising the purchase of 'restricted supply' chemicals and the use of 'restricted use' chemicals. The successful completion of an approved course in agvet chemical use is a prerequisite to be issued with this permit. Permits are granted at the discretion of the Department of Jobs, Precincts and Regions.
-------------	--

Agsafe Limited	An organisation that implements industry stewardship programs, including the agricultural and veterinary chemical industry's self-regulatory program of accreditation. The accreditation program applies to the safe storage, handling, transport and sale of agricultural and veterinary chemicals from the place of manufacture through to the point of sale.
-----------------------	---

APVMA	Australian Pesticides and Veterinary Medicines Authority – the Australian government authority responsible for the assessment and registration of pesticides and veterinary medicines and for their regulation up to and including the point of sale.
--------------	---

authorised person (also bait user)	A person permitted to be supplied with and/or use 1080 pest animal bait products (as described in Section 3.1 Authorised persons in the <i>Directions for the Use of 1080 and PAPP Pest Animal Bait Products in Victoria</i>). Also known as 'authorised users' or 'bait users' for the purposes of this document. Also includes a person who can act as an 'agent' (see Section 3.1 Authorised persons in the <i>Directions for the Use of 1080 and PAPP Pest Animal Bait Products in Victoria</i>).
---	---

bait preparation	Preparation of the bait substrate to the approved standards prior to the application of 1080 Aqueous Solution. Approved standards are prescribed in Section 8 and 9 of this document.
-------------------------	---

COL	Commercial Operator Licence – a licence issued by the Victorian Department of Jobs, Precincts and Regions under the <i>Agricultural and Veterinary Chemical (Control of Use) Act 1992</i> , allowing a person to carry on a business or offer a service for fee or reward, which involves the use of agricultural chemical products.
------------	--

container	Any primary container in which a chemical product is, or is to be, covered, enclosed, contained or packaged, but does not include a container (such as a shipping container) in which other primary containers of chemical products are placed for the purpose of being transported.
DH	The Victorian Department of Health.
Directions for the Use of 1080 Pest Animal Bait Products in Victoria	The document that describes the directions for the use of 1080 pest animal bait products in Victoria in accordance with relevant legislation. It is a legal requirement that all persons using 1080 pest animal bait products in Victoria comply with this document, as well as the 1080 pest animal bait product label and the relevant Safety Data Sheet.
DJPR	The Victorian Department of Jobs, Precincts and Regions.
handling	Includes transportation, storage, processing, use and disposal.
lay (bait)	Placement of bait in the landscape. This includes burial and surface placement of bait by aerial, broadcast or trail application.
manufacture / manufacturer	Includes the process of refining, adding or mixing 1080 poison to create a 1080 pest animal bait product either registered with, or under permit from, the Australian Pesticides and Veterinary Medicines Authority; 'manufacturer' has a corresponding interpretation.
manufacturing facilities	The Victorian Department of Health licensed premises where perishable 1080 pest animal bait is manufactured.
mobile facility	A trailer or vehicle suitably fitted out or containing equipment and apparatus for the purpose of manufacture, sale and supply of perishable 1080 pest animal bait products.
mobile facility licence	A licence issued under section 19 (6) of the <i>Drugs Poisons and Controlled Substances Act 1981</i> to person/s intending to manufacture 1080 pest animal bait products from a mobile facility.
mobile facility location	The location where the manufacture, sale or supply of perishable 1080 pest animal bait products is undertaken, as authorised under the mobile facility licence. For the purposes of this code, the mobile facility location is a site other than the primary licensed manufacturing facility.
PCL	Pest Control Licence – issued by the Victorian Department of Health under section 101 of the <i>Public Health and Wellbeing Act 2008</i> to permit a person to apply pesticides in the course of the business of a pest control operator.
perishable baits	1080 pest animal bait products made by injecting or applying 1080 Aqueous Solution to carrot or liver or boneless red meat and supplied under permit from the Australian Pesticides and Veterinary Medicines Authority. These baits have a short shelf-life and must be laid within 3 days of the date of manufacture.
pest animal	An animal species declared as a 'pest animal' under the <i>Victorian Catchment and Land Protection Act 1994</i> . Pest animal species that may be baited with 1080 poison in Victoria include wild dogs, foxes, rabbits and feral pigs.

product label	The written, printed and related graphic matter on, or attached to, the primary container in which the product is directly packed and the outside container or wrapper of the retail or wholesale package. A label includes a tag leaflet, sticker, brand, stamp, mark, stencil or written statement. 1080 product labels must be approved by the Australian Pesticides and Veterinary Medicines Authority.
restricted chemical product	A chemical product declared under the <i>Agricultural and Veterinary Chemicals Code Act 1994</i> as a restricted chemical product. Restricted chemical products are only to be supplied to persons who are authorised to have them.
SDS	Safety Data Sheet – a document that describes the identity, properties, health hazards, precautions for use and handling of a hazardous substance.
shelf-stable baits	Shelf-stable baits are 1080 pest animal bait products that generally have a shelf-life in excess of one year and are registered with the Australian Pesticides and Veterinary Medicines Authority. They include dried manufactured meat-based baits and dry oat baits. They do not include air dried boneless red meat or liver baits.
supply	Provide, give or deliver, whether or not for fee, reward or consideration or in expectation of fee, reward or consideration.
the code	Refers to the <i>1080 Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Products (Using 1080 Aqueous Solution)</i> – this document.

1. Introduction

Registered products containing sodium fluoroacetate (1080) are approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA) for the control of a variety of vertebrate pests in Victoria including wild dogs, foxes, rabbits and feral pigs. The use of 1080 pest animal bait products is one element of pest management and should be used as part of an integrated pest animal control program. Effective pest animal management requires planning, the use of a range of control tools and is best achieved with close cooperation from adjoining land managers.

There are two types of 1080 pest animal bait products available for authorised users to purchase and use in Victoria: shelf-stable baits and perishable (short-life or 'fresh') baits. Shelf-stable baits include dried manufactured meat-based baits and dry oat baits. They do not include air dried boneless red meat or liver baits. Perishable baits are fresh bait products that must be laid within 3 days of the date of manufacture. Carrot, liver and boneless red meat are examples of perishable baits.

1080 poison is included in Schedule 7 (Dangerous Poison) of the *Standard for the Uniform Scheduling of Medicines and Poisons*. Perishable pest animal bait products prepared using 1080 Aqueous Solution are also Schedule 7 poisons. Schedule 7 poisons have a high potential for causing harm at low exposure and require special precautions for handling and use. Schedule 7 poisons are available only to specialised or authorised users who have the knowledge and skills to handle them safely.

The only 1080 pest animal bait products legally available for supply and use in Victoria are:

- APVMA registered products; and
- Perishable baits made using registered 1080 Aqueous Solution and supplied in accordance with an APVMA permit.

It is illegal for anyone, including 1080 pest animal bait users, to manufacture a shelf-stable or perishable 1080 pest animal bait product without having a manufacturing licence from the Victorian Department of Health (DH).

1.1 Context of this Code of Practice

The *Drugs, Poisons and Controlled Substances Act 1981* (DPCS Act), the *Drugs, Poisons and Controlled Substances Regulations 2006* (DPCS Regulations) and the *Agricultural and Veterinary Chemicals (Control of Use) Act 1992* and its associated Regulations are the major pieces of legislation governing the manufacture, sale, supply and use of 1080 in Victoria.

Products containing 1080 are available in three formulations – shelf-stable baits, perishable baits and 1080 Aqueous Solution. Shelf-stable baits generally have a shelf-life in excess of one year and are registered with the APVMA. Perishable baits may be registered with the APVMA or manufactured using 1080 Aqueous Solution and supplied under a permit from the APVMA. The bait user must lay perishable baits within 3 days of the date of manufacture. 1080 aqueous formulations (Aqueous Solutions) are not used directly to poison pest animals, but are used to prepare 1080 pest animal bait products.

This Code of Practice is specific to perishable baits that are made using 1080 Aqueous Solution and supplied under an APVMA permit. This Code provides an overview of the relevant legislation and describes the standards and procedures for the manufacture, supply and sale of perishable 1080 pest animal baits prepared using APVMA registered 1080 Aqueous Solution.

It is a DH licence requirement that persons who prepare perishable 1080 pest animal bait products using 1080 Aqueous Solution comply with this document.

In Victoria, a legislative Order under the *Agricultural and Veterinary Chemicals (Control of Use) Act 1992* regulates the use of perishable pest animal baits prepared using 1080 Aqueous Solution. This Order states that perishable 1080 pest animal baits can be prepared using the following three bait substrates:

- Liver for the control of foxes and wild dogs;
- Carrot for the control of rabbits; and
- Boneless red meat for the control of wild dogs.

It is the responsibility of the manufacturer of perishable 1080 pest animal bait products (prepared using 1080 Aqueous Solution) to comply with the directions on the product label, legislative requirements and DH and the Department of Jobs, Precincts and Regions (DJPR) licensing requirements.

2. Authorisation to Manufacture and Supply Perishable 1080 Pest Animal Bait Products (prepared using 1080 Aqueous Solution)

1080 is a restricted chemical product under the *Agricultural and Veterinary Chemicals Code Act 1994* that can only be supplied to persons who are authorised to have it. Manufacturers of perishable 1080 pest animal bait products must be appropriately licensed and trained to prepare and supply perishable 1080 pest animal bait products. The following sections outline the licensing, training and accreditation requirements for manufacturers who prepare perishable 1080 pest animal bait products using 1080 Aqueous Solution.

2.1 Requirements of manufacturers of perishable 1080 pest animal bait products

Manufacturers of perishable 1080 pest animal bait products prepared using 1080 Aqueous Solution must:

(a) Have a licence from DH to manufacture or supply 1080 pest animal bait products using APVMA registered 1080 Aqueous Solution.

Section 20 of the DPCS Act authorises a person to manufacture and sell or supply Schedule 7 poison under a licence.

To qualify for a DH licence to manufacture **from a fixed premises** a person must:

- Be a manufacturer of APVMA-registered 1080 Aqueous Solution; or
- Hold a Commercial Operator Licence with vermin destroyer endorsement and have completed the Agriculture Victoria course *Preparation of Perishable 1080 Pest Animal Bait Products (using 1080 Aqueous Solution)*; or
- Hold a Pest Control Licence issued under the *Public Health and Wellbeing Act 2008*, with an authorisation to use pesticides formulated for the control of pest animals to protect a building used for commercial purposes, a domestic premises, or privately owned land adjacent to domestic premises and have completed the Agriculture Victoria course *Preparation of Perishable 1080 Pest Animal Bait Products (using 1080 Aqueous Solution)*.

Manufacturers of perishable 1080 pest animal bait products with a licence to **wholesale** can sell or supply perishable 1080 pest animal bait products to:

- An Agsafe-accredited 1080 retailer;
- Another licensed wholesaler of Schedule 7 poisons; or
- An authorised person (bait user or agent).

Manufacturers of perishable 1080 pest animal bait products with a licence to **retail** can only sell or supply perishable 1080 pest animal bait products to:

- An authorised person (bait user or agent).

(b) Comply with the current version of this Code – Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Products (Using 1080 Aqueous Solution).

It is a condition of the DH licence to supply 1080 pest animal bait products that the licence holder complies with current version of this Code – *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Products (Using 1080 Aqueous Solution)*.

It is important that manufacturers notify DH or Victoria Police immediately if they become aware of the loss or theft of a poison or controlled substance (regulation 70 of the DPCS Regulations), including 1080 aqueous concentrate or 1080 perishable pest animal bait products.

(c) Supply in accordance with a valid 'Permit for Supplying a Perishable Bait Treated with a Registered Chemical Product' from the APVMA and the DPCS Act and Regulations.

1080 Aqueous Solution used to prepare perishable baits must be registered for that purpose with the APVMA.

Perishable 1080 pest animal bait prepared using 1080 Aqueous Solution does not need to be registered with the APVMA. Instead, possession, supply and use are enabled by the APVMA *Permit for Supplying a Perishable Bait Treated with a Registered Chemical Product*, to the extent that these would otherwise be an offence against the *Agricultural and Veterinary Chemicals Code Act 1994*.

This permit stipulates that bait may only be supplied to end users (i.e. persons who lay the baits) with instructions on how to lay baits and other requirements to be followed. The supplier of the bait must inform the end user that the bait may only be used in accordance with the instructions supplied with the bait and terms of the permit.

A person who sells or supplies any Schedule 7 poison by retail must store all Schedule 7 poison in a storage facility that is not accessible to the public, unless access to that area or facility is under the personal supervision of that person or a person acting under his/her direction (regulation 66 of the DPCS Regulations).

Section 40 of the DPCS Act requires that a person shall not sell or supply any Schedule 7 poison to a person who is under the age of 18 years. Retail supply to anyone may only be from the supplier's original and unopened packs (regulation 68 of the DPCS Regulations).

Anyone supplying perishable 1080 pest animal bait must not supply it to another person who does not separately comply with Victorian requirements to possess and use 1080 pest animal bait. An authorised person may use an agent to purchase 1080 pest animal bait products on their behalf. The agent must be an authorised person and must present their valid authorisation at the point of supply.

(d) Keep records of retail activity and sell, supply and store in accordance with existing requirements for Schedule 7 poisons under the DPCS Act.

Section 38 of the DPCS Act requires that a person who sells or supplies by retail a Schedule 7 poison must keep an accurate record of the sale or supply, including the following details:

- The name and address of the person who purchases or obtains the poison or controlled substance;
- The date of supply; and
- The name and quantity of the poison or controlled substance purchased or obtained.

Records are to be kept for three years.

2.2 Additional requirements of manufacturers of perishable 1080 pest animal bait products who manufacture from a mobile facility

A person intending to manufacture 1080 pest animal bait products from a mobile facility must also:

(a) Have a mobile facility licence from DH.

A mobile facility is a trailer or vehicle suitably fitted out to contain equipment and apparatus for the purpose of manufacture and supply of perishable 1080 pest animal bait products.

A mobile facility licence authorises the licence holder to manufacture and sell or supply by wholesale or retail (dependent on specific licence conditions) any perishable 1080 pest animal bait product at a mobile facility location to which the mobile facility licence relates (meaning a site that has been notified to DJPR).

To qualify for a DH licence to manufacture **from a mobile facility** a person must:

- Hold a DH licence to manufacture and supply perishable 1080 pest animal bait products from a fixed premises.

A mobile facility licence:

- Relates to the period the mobile facility is located at a mobile facility location;
- Is personal to the licence holder and is not transferable to another person or business; and
- May be issued in respect to one or more mobile facilities.

The licence holder must ensure each mobile facility is secured at the fixed premises specified in the licence during any period the mobile facility is not travelling to or from, or located at, a mobile facility location. The mobile facility must be registered under the *Road Safety Act 1986* and identified by a number plate bearing a registration number.

Authorised persons can use perishable 1080 pest animal bait products, but only the person named on the DH licence can manufacture 1080 pest animal bait products using APVMA registered 1080 Aqueous Solution in accordance with an APVMA permit.

(b) Notify DEDJTR of the intent to manufacture.

A mobile facility licence authorises a person to manufacture only at a mobile facility location. The mobile facility location must be reported to DJPR prior to manufacture.

The mobile facility licence holder must also obtain permission from the owner/occupier/manager of the mobile manufacture location in order to enter the site on that day(s) and must determine that the site is suitable for the safe manufacture and supply of 1080 perishable pest animal bait products.

Notification of intent to manufacture from a mobile facility location must be provided to DJPR at least 7 days prior to manufacture in the first instance for a specific location. Notification must include details of the proposed site for the mobile facility location. For subsequent manufacturing at that site, notification must be provided 1 day prior to manufacture. Notification must be provided each time a facility location is used.

Notifications must be made to the Customer Service Centre on 136 186.

2.3 Additional requirements of manufacturers of perishable 1080 pest animal bait products who lay bait on behalf of a land manager or owner

If the manufacturer prepares the perishable 1080 pest animal bait and lays it on behalf of a landholder, the manufacturer must meet the requirements of Sections 2.1 and 2.2 of this document and must also:

(a) Be licensed to commercially apply 1080 baits.

Commercial applicators include:

- A person, entity or staff member operating under a valid Commercial Operator Licence with a vermin destroyer endorsement issued under the *Agricultural and Veterinary Chemicals (Control of Use) Act 1992* who has successfully completed the *Course in Minimising Risks in the Use of 1080 & PAPP Bait Products for Vertebrate Pest Control*; or
- A person who holds a valid Pest Control Licence issued under the *Public Health and Wellbeing Act 2008*, with an authorisation to use pesticides formulated for the control of pest animals to protect a building used for commercial purposes, a domestic premises, or privately owned land adjacent to domestic premises; and has completed the *Course in Minimising Risks in the Use of 1080 & PAPP Bait Products for Vertebrate Pest Control*.

(b) Comply with the *Directions for the Use of 1080 and PAPP Pest Animal Bait Products in Victoria*.

(c) Keep records of use as prescribed under the *Agricultural and Veterinary Chemicals (Control of Use) Regulations 2007*, for a minimum period of two years.

3. Legislation Affecting the Manufacture, Supply, Transport, Storage and Use of Perishable 1080 Pest Animal Bait Products

All persons involved in the manufacture, supply, storage, handling, transport and use of perishable 1080 pest animal bait products must adhere to all relevant Acts, Regulations, Codes and statutory requirements pertaining to the manufacture, supply, storage, handling, transport and use of 1080.

Acts, Regulations, Codes and statutory requirements are amended periodically. It is the responsibility of the manufacturer of perishable 1080 pest animal bait products to understand and adhere to all current Acts, Regulations, Codes and statutory requirements.

3.1 Commonwealth Legislation

Agricultural and Veterinary Chemicals Code Act 1994

This Act makes provisions for the evaluation, registration and control of agricultural and veterinary chemical products. It also specifies the responsibility of the APVMA, which includes the regulation of chemical manufacture and supply. This Act classifies 1080 as a restricted chemical, meaning that it is only available to persons who have the skills necessary to handle it safely and are authorised to have it. This Act also contains Regulations, which restrict the availability, storage and use of the product.

National Transport Commission Act 2003

This Act governs the transport of dangerous goods in Australia. It also provides a legal foundation to the *Australian Code for the Transport of Dangerous Goods by Road and Rail*. This Code sets out the technical requirements and guidelines for the transport of dangerous goods by road and rail and lists 1080 Aqueous Solution as a dangerous good (Class 6.1 toxic substance).

3.2 State Legislation

Agricultural and Veterinary Chemicals (Control of Use) Act 1992

This Act governs the use of agricultural and veterinary chemicals in Victoria, such as 1080 Aqueous Solution and 1080 pest animal bait products. Under this Act, users of 1080 products are legally required to comply with the instructions on the product label, record keeping and authorisation requirements.

Dangerous Goods Act 1985

This Act sets out the general duties for the manufacture, storage, transport, transfer, sale and use of dangerous goods. 1080 Aqueous Solution is classified as a dangerous good (Class 6.1 toxic substance). Relevant regulations to this Act include the *Dangerous Goods (Storage and Handling) Regulations 2012* and the *Dangerous Goods (Transport by Road or Rail) Regulations 2008*. Appropriate placarding of manufacturing facilities includes fixed premises and mobile facilities.

This legislation regulates the transport of dangerous goods by road in Victoria in order to promote public safety and protect property and environment. This legislation governs the transport of 1080 Aqueous Solution as it is a specified dangerous good.

Drugs, Poisons and Controlled Substances Act 1981

The DPCS Act is the primary legislation pertaining to the manufacture, sale and supply of 1080 in Victoria. All manufacturers of Schedule 7 poisons, including shelf-stable and perishable 1080 pest animal bait products, who lay baits themselves or supply the baits to other end users, are required to hold a licence to manufacture and sell or supply from DH. Licences can be issued only to fixed premises or mobile facilities found on inspection to be suitable, sanitary and adequately equipped for the manufacture, sale or supply of 1080 baits. Premises and mobile facilities are subject to audit and licences are renewed annually.

Mobile facilities must be registered under the *Road Safety Act 1986*.

Licence applications for each 1080 licence type comprise an application form, a form to nominate a responsible person, the fee and a Poisons Control Plan in which the applicant identifies how they will comply with the DPCS Act and the DPCS Regulations. Licence conditions require licence holders to comply with the registered Poisons Control Plan.

The DPCS Act places controls on the retail supply of Schedule 7 poisons. It also requires that Schedule 7 poisons cannot be sold or supplied unless the label, container, storage and packaging are in accordance with the *Standard for the Uniform Scheduling of Medicines and Poisons*.

Occupational Health and Safety Act 2004

This Act sets out the general duties of care applying to employers, employees, designers, manufacturers and suppliers. This Act includes provisions to ensure employers provide and maintain a working environment that is safe and without risk to health. Relevant regulations to this Act include *the Occupational Health and Safety (Hazardous Substances) Regulations 1999*.

4. Manufacturing Facilities

1080 Aqueous Solution is classified as a dangerous good (class 6.1).

The *Dangerous Goods Act 1985* and *Dangerous Goods (Storage & Handling) Regulations 2012* provide the statutory requirements for the safe storage and handling of dangerous goods, including plant design and security, plant condition and repair, spill containment, preparedness for incidents and emergencies and placarding requirements. Manufacturing facilities must also comply with the *Occupational Health and Safety (Hazardous Substances) Regulations 1999*.

Manufacturing facilities at a fixed address or a mobile facility must comply with all relevant Acts, Regulations, Codes and statutory requirements and any requirements on the 1080 Aqueous Solution product label. Manufacturing premises and mobile facilities must be licensed by DH and are inspected before any manufacturing licence is issued.

Manufacturers must assess and manage the risks appropriate to the site, facility and associated activities involved in the process of manufacture and supply of perishable 1080 pest animal bait products in Victoria.

4.1 Requirements of manufacturers of perishable 1080 pest animal bait products who manufacture from a mobile facility

(a) Mobile facility location selection and site security

Bait manufacturers who manufacture from a mobile facility must ensure:

- Only the person named on the DH licence manufactures 1080 pest animal baits products;
- Persons who are not otherwise authorised can assist with the preparation of the bait matrix prior to the application of 1080 Aqueous Solution. Bait preparation must be undertaken in a work area clearly separated from the area used for bait manufacture (applying the 1080 aqueous solution). Only DH licence holders can have access to the manufacturing facility while bait products are in the process of being manufactured, packaged and supplied;
- The licence holder must mark out a separate area immediately around the mobile facility to clearly define the area that must not be entered into by non-licence holders;
- The site selected is secure and not able to be accessed by the general public; and
- The site has immediate access to adequate water for wash down and emergency management.

(b) Distance restrictions for mobile manufacture

Bait manufacturers must adhere to minimum distance requirements from certain features when manufacturing perishable 1080 pest animal bait products. The minimum distance requirements are:

Feature	Minimum Distance
Dwelling	150 metres
Permanent or flowing water bodies	20 metres
Domestic drinking water supply	20 metres
Boundary fences	5 metres
Edge of formed public roadways	5 metres

(c) Mobile manufacturing facility

A mobile facility is a trailer or vehicle suitably fitted out or containing equipment and apparatus for the purpose of manufacture of perishable 1080 pest animal bait products at a mobile manufacturing location. It should be designed and equipped to enable the manufacture of 1080 perishable pest animal bait products to the same standard as applies to manufacture from the licensed fixed premises.

A mobile manufacturing facility must comply with all relevant Acts, Regulations, Codes and statutory requirements and any requirements on the 1080 Aqueous Solution product label. A mobile manufacturing facility must be inspected and licensed by DH before any manufacturing can be undertaken.

A mobile manufacturing facility must be constructed with the capacity to:

- Be a clearly identified and self-contained unit able to transport all necessary equipment and apparatus and to operate safely at a field site;
- Not be part of the vehicle cabin, passenger compartment or boot;
- Store and transport 1080 aqueous solution in a separate locked container securely attached inside the mobile manufacturing facility;
- Maintain bait substrate and prepared bait in good condition during transport and at the mobile facility location;
- Establish work zones that clearly separate the activities of bait preparation prior to applying 1080 and bait manufacture (applying 1080) to avoid cross contamination;
- Contain any spills and leaks of 1080 poison within the mobile facility:
 - retain and secure waste material (including substrate, 1080 contaminated waste materials and rinsate) until disposed of lawfully;
 - enable wash-down of the facility, equipment and any apparatus used to manufacture and contain that rinsate;
 - include bunded areas compliant with the requirements of the *Dangerous Goods Act 1985* and *Dangerous Goods (Storage & Handling) Regulations 2012*; and
- Display emergency contact numbers, including those that relate to the mobile facility location.

A mobile facility location must be able to comply with the following conditions:

- Applying 1080 aqueous solution to the bait matrix is conducted outside the mobile facility (for example, when treating and mixing carrot bait from a mixer located on the ground) manufacture must occur within a bunded area;
- Field mixing operations must only be conducted in a specially prepared single use site; and
- Bunded areas must be compliant with the requirements of the *Dangerous Goods Act 1985* and *Dangerous Goods (Storage & Handling) Regulations 2012*.

5. Storage and Transport

Persons who are supplied with 1080 products are responsible for ensuring the safe storage and transport of those products. The storage and transport of 1080 Aqueous Solution and perishable 1080 pest animal bait products must be undertaken in accordance with the product label, Safety Data Sheet (SDS) and all other relevant Acts, Regulations, Codes and statutory requirements.

1080 Aqueous Solution is classified as a hazardous substance due to its potential for immediate long-term health effects on the persons handling the chemical. It is also classified as a dangerous good, as it constitutes a hazard from poisoning.

1080 Aqueous Solution and perishable 1080 pest animal bait products are classified as Schedule 7 Dangerous Poisons and restricted chemical products. It has been deemed in the public interest to restrict the use of these products so that only persons who are authorised to do so can supply or use the products. They are not available to the general public.

5.1 Storage

As a dangerous good, 1080 Aqueous Solution must be stored in accordance with the *Dangerous Goods Act 1985* and associated Regulations. More stringent requirements apply to quantities of 1080 that exceed the *Dangerous Goods (Storage and Handling) Regulations 2012* placarding and manifest quantities.

As a Restricted Chemical (Schedule 7) product, perishable 1080 pest animal bait products must be stored in a locked room away from children, animals, food, feedstuffs, seed and fertilisers. 1080 Aqueous Solution must be kept or stored in a container bearing the APVMA approved product label, except when required for use. It must be stored in a locked facility accessible only to DH licence holders.

Schedule 7 poisons, in this case the 1080 Aqueous Solution and perishable 1080 pest animal bait products that are being sold or supplied, must be kept in a part of the premises which the public cannot access.

5.2 Transport

As 1080 Aqueous Solution is a dangerous good, it must be transported in accordance with the requirements of the *National Transport Commission Act 2003* and the *National Road Transport Commission (Model Legislation – Transport of Dangerous Goods by Road or Rail) Regulations 2007*, which incorporates *The Australian Code for the Transport of Dangerous Goods by Road or Rail* and the Victorian *Dangerous Goods Act 1985* and *Dangerous Goods (Transport by Road or Rail) Regulations 2008*. 1080 Aqueous Solution must only be transported in the original container, and a shipping document listing the type and quantity of dangerous goods being transported must accompany the transport of the product. Additional requirements apply to quantities of 1080 that exceed the dangerous goods placarding or bulk amounts.

Perishable 1080 pest animal bait products must be transported in a secure and safe manner in such a way that the product is not lost in transit and that the packaging remains intact to prevent access and exposure to the general public, pets or livestock. The containers used to transport 1080 perishable pest animal bait products must meet the requirements of Section 10 of this document.

6. Safety Directions

Perishable 1080 pest animal bait product manufacturers must comply with the APVMA-approved product label safety directions and first aid instructions and refer to the SDS for additional information.

When opening the product container and using the product, manufacturers must wear appropriate personal protective equipment, including:

- Cotton overalls buttoned to the neck and wrists;
- Washable hat; and
- Elbow-length PVC gloves.

If clothing becomes contaminated with product, remove clothing immediately. If product is on skin, immediately wash area with soap and water. If product gets in eyes, wash out immediately with water. Wash hands, arms and face thoroughly with soap and water after use and before eating, drinking or smoking.

1080 is highly toxic and must be handled with care. There is no effective antidote to 1080. If poisoning occurs, contact a doctor or the Poisons Information Centre immediately on 13 11 26.

7. Manufacture of Perishable 1080 Pest Animal Bait Products Using APVMA Registered 1080 Aqueous Solution

It is a requirement of the DH manufacturing licence that preparation of perishable 1080 pest animal bait products (using 1080 Aqueous Solution) be conducted in accordance with this Code of Practice.

The quality of the bait substrate is critical for safe handling, storage, transport and use as well as bait efficacy. All perishable baits must be made from fresh substrates – untainted and of good quality, not putrid and without sign of decay. The amount of 1080 Aqueous Solution applied to the bait must be in strict accordance with the product label directions.

Only prepare enough perishable 1080 pest animal bait product to fill immediate requirements as these baits have a short life span. All perishable baits must be laid within 3 days of the date of manufacture.

Follow the 1080 Aqueous Solution safety directions and wear the appropriate personal protective equipment when using 1080 Aqueous Solution and handling the prepared baits in readiness for use.

Take extreme care when preparing perishable 1080 pest animal baits and observe all safety precautions and procedures.

7.1 Product label

It is a legal requirement that 1080 Aqueous Solution is used strictly in accordance with the APVMA-approved product label. According to the APVMA, the label includes:

- The carton/package label;
- The label on the immediate container, including flag labels; and
- Product inserts, including booklets on product labels.

Manufacturers are required to follow all directions on the 1080 Aqueous Solution product label and SDS. Labels must comply with APVMA labelling requirements, incorporating the requirements for Schedule 7 poisons under the *Standard for the Uniform Scheduling of Medicines and Poisons*.

8. Preparation of Meat and Liver Bait

The concentration of 1080 Aqueous Solution applied to each meat or liver bait must exactly match the dose specified on the 1080 Aqueous Solution product label. All perishable 1080 pest animal bait products must be dyed so that they have a visible blue coating (note: some 1080 Aqueous Solution products contain blue dye for this purpose).

8.1 Equipment/ingredients

The following materials and equipment are required for the preparation of meat and liver bait:

- Personal protective equipment (see Section 6);
- Liver or meat (boneless red meat);
- APVMA registered 1080 Aqueous Solution;
- Blue dye;
- Repeating injector device graduated appropriate to the label prescribed dose rate;
- APVMA approved containers for bait storage (see Section 10);
- Non-absorbent tongs (i.e. metal or plastic); and
- Non-absorbent tray (i.e. metal or plastic).

8.2 Procedure for the preparation of meat bait

Meat bait must have the 1080 Aqueous Solution injected into the centre of the bait and baits must be dyed blue. Meat bait must be prepared in the following way:

1. Cut the fresh meat into cubes weighing between 150g and 200g wet weight.
2. Seal the outside of the bait. The baits can be sealed by pan frying, deep frying, air drying or any other method to seal the outside of the bait allowing the injected 1080 Aqueous Solution to be contained within the bait.
3. Put on the required personal protective equipment and fill the injecting mechanism with the appropriate amount of 1080 Aqueous Solution.
4. Place the baits on the tray or individually hold each bait with the tongs.
5. Insert the syringe into the bait. Take care to ensure that the syringe does not penetrate right through the bait. Inject the correct amount of 1080 Aqueous Solution to achieve the bait dose specified on the 1080 Aqueous Solution product label.
6. Apply blue dye to the extent that each bait has a visible blue coating.
7. Place each prepared bait into an approved, labelled container (see Section 10).

8.3 Procedure for the preparation of liver bait

Liver bait must have the 1080 Aqueous Solution injected into the centre of the bait and baits must be dyed blue. Liver bait must be prepared in the following way:

1. Cut liver into cubes:
 - Individual baits for wild dogs must weigh between 150g and 200g wet weight; and
 - Individual baits for foxes must weigh between 30g and 100g wet weight.
2. Seal the outside of the bait. The baits can be sealed by pan frying, deep frying, air drying or any other method to seal the outside of the bait allowing the injected 1080 Aqueous Solution to be contained within the bait.
3. Put on the required personal protective equipment and fill the injecting mechanism with the appropriate amount of 1080 Aqueous Solution for the number of baits to be made.
4. Place the baits on the tray or individually hold each bait with the tongs.
5. Insert the syringe into the bait. Take care to ensure that the syringe does not penetrate right through the bait. Inject the correct amount of 1080 Aqueous Solution to achieve the bait dose specified on the 1080 Aqueous Solution product label.
6. Apply blue dye to the extent that each bait has a visible blue coating.
7. Place each prepared bait into an approved, labelled container (see Section 10).

9. Preparation of Carrot Bait

The concentration of the 1080 Aqueous Solution applied to each kilogram of carrot must exactly match the dose rate in the finished bait specified on the 1080 Aqueous Solution product label.

Carrot bait must be dyed blue (note: some 1080 Aqueous Solution products contain blue dye for this purpose).

9.1 Equipment/ingredients

The following materials and equipment are required for the preparation of carrot bait:

- Personal protective equipment (as described in Section 6);
- Revolving mixing drum with a lid that encloses the opening of the mixer;
- A spray mechanism capable of delivering a specific amount of 1080 Aqueous Solution evenly onto the carrot bait;
- Carrot;
- Blue dye (if not contained within the 1080 Aqueous Solution); and
- APVMA registered 1080 Aqueous Solution (amount as per label directions).

9.2 Procedure for the preparation of carrot bait

1. Prepare or purchase carrot. Carrot must be diced to a uniform size of between 1cm³ and 1.5cm³.
2. Pour the 1080 Aqueous Solution into the delivery mechanism at the label prescribed dose rate.
3. Apply the mixture (and the dye) to the carrots in the revolving mixing drum. Allow the mixer to operate for two minutes so that the 1080 Aqueous Solution and dye are uniformly spread over the carrots, and the carrots have a visible blue coating.
4. Transfer the poison carrot bait directly into an approved, labelled bait container (see Section 10).

10. Containers and Labelling of Perishable 1080 Bait

The manufacturer of 1080 perishable pest animal bait products is responsible for ensuring that labels and containers comply with legal requirements. This responsibility extends to situations where the end user may wish to provide their own containers.

Requirements for containers and labels of Schedule 7 poisons are provided in *PART 2 LABELS AND CONTAINERS* of the *Standard for the Uniform Scheduling of Medicines and Poisons. Australian Standard AS 2216-1997* outlines that poisonous substances must be packaged in containers that are appropriately marked and robust enough to withstand damage which would result in leakage during the ordinary risks of storage, handling and transport.

The *Australian Standard AS 2216-1997 Packaging for poisoning substances* also requires compliance with container and packaging requirements in the *Australian Code for the Transport of Dangerous Goods by Road and Rail*.

In addition, the *Permit for Supplying a Perishable Bait Treated with a Registered Chemical Product* from the APVMA states that the container used to hold perishable 1080 pest animal bait products must meet the following specifications:

- Be impervious to, and incapable of, chemical reaction with its contents when under conditions of temperature and pressure that are likely to be encountered in normal service;
- Have sufficient strength and impermeability to prevent leakage of its contents during handling, transport and storage under normal handling conditions;
- If it is intended to be opened more than once, be able to be securely and readily closed and re-closed;
- Have sufficient excess capacity to prevent it from breaking if its contents expand during handling, transport or storage; and
- Enable all or any part of its contents to be removed or discharged in such a way that, with the exercise of no more than reasonable care, the contents cannot harm any person or have an unintended effect that is harmful to the environment.

The conditions on the APVMA Permit for Supplying a Perishable Bait Treated with a Registered Chemical Product state that the text of the label must include all instructions, warnings and other information given on the approved label of the chemical product used in the manufacture of the bait (with the exception of those parts of the label relating to preparation of the baits).

This includes, but is not limited to, the Dangerous Poison signal heading, product name, active constituent name, restricted chemical product statement, directions for use of the bait (including bait placement instructions and distance and notification requirements), precaution statements, protection statements, storage and disposal instructions, safety directions and first aid instructions.

Specifications for label statements must be in accordance with the labelling requirements of the *Standard for the Uniform Scheduling of Medicines and Poisons*.

In accordance with an Order made under section 25A of the *Agricultural and Veterinary Chemicals (Control of Use) Act 1992*, all perishable 1080 pest animal baits must be laid within 3 days of the date of manufacture. Consistent with this Order the date of manufacture needs to be included on the perishable 1080 pest animal bait product label.

Users of plastic bags as containers to hold perishable baits must be able to demonstrate that the containers are sufficiently robust to meet the APVMA permit conditions and other container specifications. *Australian Standard AS 2216-1997* Section 1.4 and Section 4 detail expectations of flexible containers including the requirements:

- To withstand rupture and maintain leakproofness during ordinary use;
- That any bag handles are suitably strong and firmly attached; and
- To be capable of being securely closed.

11. Cleaning, Spills and Disposal

Manufacturers of perishable 1080 pest animal bait products must address cleaning, spillage and container disposal in accordance with the product label, SDS and all relevant Acts, Regulations, Codes and statutory requirements.

Triple rinse and bury rinsate and empty containers in a local authority landfill. If no landfill is available, bury the containers below 0.5 metres in a disposal pit specifically marked and set up for this purpose, clear of waterways, desirable vegetation and tree roots. Empty containers should not be burnt. Do not re-use containers for any other purpose.

Sodium fluoroacetate is readily degraded by common soil bacteria and moulds. Wash any contaminated areas with soapy water and bury rinsate from washed areas.

12. Accident and Incident Reporting

The *DPCS Regulations* require that a person who holds a licence under the DPCS Act who loses a poison or controlled substance (including 1080) or from whom a poison or controlled substance is stolen must immediately, upon becoming aware of that loss or theft, notify DH or a member of the Victoria Police force.

If bait users are concerned for any companion animals, livestock or wildlife suspected of being poisoned with 1080 they should refer them for immediate veterinary assistance. All incidents of suspected 1080 poisoning of non-target animals, including domestic dogs, must be reported to the Customer Service Centre on 136 186. These actions may allow for the capture of information important in an investigation, such as a veterinarian taking a sample of the stomach contents of an animal suspected of being poisoned.

Manufacturers must also comply with incident notification requirements under *the Occupational Health and Safety (Incident Notification) Regulations 1997*.

13. Record Keeping

Records of notification, manufacture, storage and supply must be kept in accordance with existing requirements for Schedule 7 Poisons under the *DPCS Act* for three years and in accordance with any licence conditions.

14. Work Health and Safety

Persons using 1080 pest animal bait products in their workplace are required to assess work health and safety risk and implement control options in accordance with the *Occupational Health and Safety Act 2004*, *Occupational Health and Safety (Hazardous Substances) Regulations 1999*, *Dangerous Goods (Storage and Handling) Regulations 2012* and the relevant SDS.

1080 Aqueous Solution is classified as a Hazardous Substance. The management, handling and use of 1080 Aqueous Solution and perishable 1080 pest animal bait products must be conducted in accordance with the *Occupational Health and Safety Act 2004*, *Occupational Health and Safety (Hazardous Substances) Regulations 1999*, as well as any associated Standards, Codes and statutory requirements.

15. Review

DJPR reserves the right to review any part of this document at any time.

16. Further Information

Acts

Victorian Legislation and Parliamentary Documents website www.legislation.vic.gov.au

National legislation can be accessed at www.comlaw.gov.au

Labels, Containers, Permits, Product Registration and Manufacturer Licences

For information about registered products phone the APVMA on (02) 6770 2300 or visit www.apvma.gov.au

Label and container requirements for Schedule 7 poisons are found in the *Standard for the Uniform Scheduling of Medicines and Poisons* (the Poisons Standard) www.tga.gov.au/industry/scheduling-poisons-standard.htm

Information on 1080 Use and Pest Animal Control

Further information on 1080 use and pest animal control and can be accessed at www.agriculture.vic.gov.au/1080 or by calling the Customer Service Centre on 136 186.

Manufacturing Licences

Details of manufacturing licences and application forms can be accessed from the DH website at <https://www.health.vic.gov.au/drugs-and-poisons/1080-pest-baits-information-and-application-forms>, by calling 1300 364 545 or emailing dpcs@health.vic.gov.au

Work Health and Safety

The Worksafe Advisory Service can respond to general occupational health and safety queries. If in Victoria phone 1800 136 089 or if outside Victoria phone (03) 9641 1444.

A summary of the *Occupational Health and Safety Act 2004* can be found at www.worksafe.vic.gov.au

More information about Occupational Health and Safety can be found at the Australian Safety and Compensation Council website www.ascc.gov.au

Poisoning

If poisoning occurs contact a doctor or the Poisons Information Centre immediately on 13 11 26.

Storage and Handling

A Code of Practice for the Storage and Handling of Dangerous Goods has been developed to provide practical guidance to manufacturers and suppliers of dangerous goods on how to comply with the regulations. The Code of Practice can be found at www.workcover.vic.gov.au

The National Code of Practice for the Storage and Handling of Workplace Dangerous Goods 2001 aims to provide practical guidance and advice on compliance. It is available from www.ascc.gov.au

Storage requirements for Schedule 7 poisons are found in the *Standard for the Uniform Scheduling of Medicines and Poisons* (the Poisons Standard) www.tga.gov.au/industry/scheduling-poisons-standard.htm