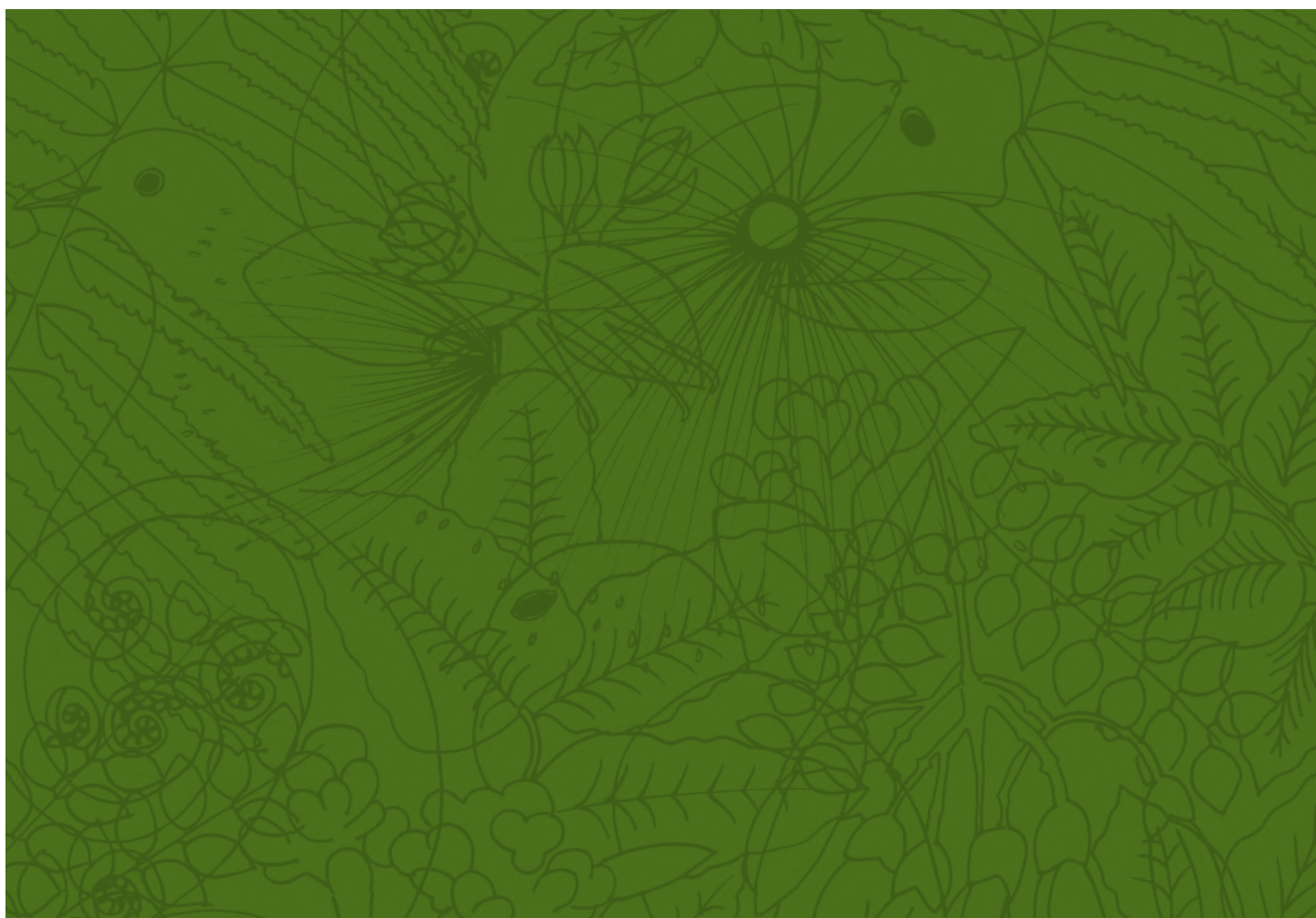




B8

TRACKING MINIMUM REQUIREMENTS FOR TRACKING VERTEBRATE TOXIC AGENTS



PRODUCED BY



National Pest
Control Agencies

ABOUT NPCA

This document was published by NPCA (National Pest Control Agencies) which, until part way through 2018, provided a co-ordinating forum for agencies and stakeholders to address vertebrate animal pest control in New Zealand. In 2018 its role was largely taken over by the Ministry for Primary Industries.

PUBLICATIONS

Most of NPCA's publications on animal pest control were partially updated in April 2018 and transferred to the library section of the Ministry for Primary Industries' 'BioNet' online portal. The updates reflect the transfer and also acknowledge the change in the regulatory regime during 2017 and 2018, while not fully incorporating these changes in the interim, pending further reviews of the publications. Written by experienced practitioners, the main titles cover:

- best practice guidelines on controlling and monitoring vertebrate pests; and
- information about relevant regulations.

The transferred publications can be found at www.bionet.nz/library

REMEMBER

Follow **Label** Directions
Have **Safety Data Sheet** On Hand

National Poisons Centre
24 hour emergency service
0800 764 766

General Emergency
Dial 111

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National Pest
Control Agencies

TRACKING

MINIMUM REQUIREMENTS FOR TRACKING VERTEBRATE TOXIC AGENTS

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Please regularly check the BioNet publications library at www.bionet.nz/library
for the revised version which will be published in due course.

AMENDMENTS IN THIS EDITION

This April 2018 edition has been updated as part of an interim generic review of most NPCA publications. The purpose is twofold.

- » Firstly, to reflect the substantial change in the regulatory regime relating to Health and Safety and use of VTAs (Vertebrate Toxic Agents) in the workplace, which now both sit under the Health and Safety at Work Act 2015, and associated regulations.
- » Secondly, to change links to other NPCA publications and contact details now that NPCA's publications have been transferred to the BioNet portal, run by the Ministry for Primary Industries.

The full nature of the regulatory changes have NOT been fully captured here, and users are directed to the source legislation and website information provided by the various administering agencies.

This interim review is intended to be followed up more fully in due course.

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PART.1 PURPOSE

These guidelines were commissioned by the Biosecurity Managers Group through the National Pest Control Agencies (NPCA).

Regulatory aspects for tracking of vertebrate toxic agents (VTA's) are summarised and made available in this document, which was initiated to expand on the chapter on tracking in the sister publication, "*Minimum Requirements for the Use and Handling of Vertebrate Toxic Agents*", available in the BioNet publication library: www.bionet.nz/library/. As this 'B8' tracking guidelines document has a very narrow focus on tracking only, it should be consulted in conjunction with the use and handling document, which has a broader focus.

The main audiences are field staff and contractors responsible for vertebrate pest control programs.

1.1 Cautions

When subject to legislative requirements readers are directed to the legislation itself and asked to consult their legal advisors.

The legislation referred to in these guidelines is liable to change.

Additional Best Practice Guidelines for various target species are available. These complementary guidelines are also available from the BioNet publication library: www.bionet.nz/library/.

1.2 Acknowledgements

Thanks to the expert working group involved in the preparation of these guidelines.

PART.2 PURPOSE OF TRACKING AND REGULATORY REQUIREMENTS

2.1 Overview

Some VTA's require tracking throughout their life cycle, from manufacture, through transport, use and disposal. The regulations are designed so that, at any time of the life cycle of such substances, an enforcement officer can physically locate the substance and determine who is responsible for it.

Some very hazardous substances must be tracked, by recording what happens to them from when they are imported into New Zealand or manufactured, through their distribution and transport, to their final use or disposal.

Tracked substances can only be transferred to competent persons. The Hazardous Substances Calculator will let you know if your substances have tracking requirements. See:

<https://www.hazardoussubstances.govt.nz/>

Tracking highly hazardous substances makes sure that:

- these substances are under the control of an appropriately trained person (tracked substances must be under the control of a competent person; if not, they must be appropriately secured);
- if the substances are held in transit, the place meets the requirements for a transit depot; and
- tracked substances are stored at a site that has a location compliance certificate (if one is necessary).

If the substance is manufactured in New Zealand, tracking starts at the premises where it was manufactured.

If the substance is imported into the country, tracking starts at the port where the substance enters New Zealand.

See WorkSafe's website for more detailed guidance on tracking.

2.2 Competent Persons

Any hazardous substance requiring tracking must be under the responsibility of a competent person or appropriately secured throughout its lifecycle. A competent person is either a certified handler or a person who has received the information, instruction and training required to work with the substance. If a tracked substance is transferred:

- the conditions and circumstances of its transfer must be recorded, and
- a competent person must be identified at the destination.

A tracked substance must be either:

- under the personal control of a competent person, or
- appropriately secured at all times.

2.3 Keeping tracking records

If you are the Person Conducting a Business or Undertaking (PCBU) of a site where tracked substances are used and stored, you are responsible for keeping tracking records. Tracking records must be readily accessible to workers or competent persons who handle the substance and readily understandable to any competent person required to have access to the substance – that is, these people know where to find the record and the language and terminology used is commonly understood or, otherwise, clarified to make the meaning clear.

An inspector must be able to find where the substance is located from the tracking record in two minutes, and find the substance or its container at the place stated on the record in one hour of the time specified on the emergency response plan, whichever is shorter.

The records must be kept for 12 months after the substance has been transferred to someone else.

If the substance is discharged into the environment or otherwise used or disposed of, the record must be kept for three years.

2.4 Substances to be Tracked

Tracking is mandatory for VTAs which require an approved handler (any 6.1A or B product). Tracking for 6.1C products is no longer required.

The product label will specify if tracking is required.

2.5 Hazardous Substance Tracking Forms

If you are the PCBU of a site where tracked substances are used and stored, you are responsible for keeping tracking records.

Tracking records must be readily accessible to workers or competent persons who handle the substance and readily understandable to any competent person required to have access to the substance – that is, these people know where to find the record and the language and terminology used is commonly understood or, otherwise, clarified to make the meaning clear.

An inspector must be able to find the substance location on the tracking record in two minutes, and find the substance or its container at the place stated on the record in one hour or the time specified on the emergency response plan, whichever is shorter.

The records must be kept for 12 months after the substance has been transferred to someone else.

If the substance is discharged into the environment or otherwise used or disposed of, the record must be kept for three years.

2.6 Information needed in tracking records

The tracking record must contain:

- the name, position and contact details of the competent person in control of the substance, including the physical address of the place of work;
- if applicable, the hazard classifications of each phase of the lifecycle of the substance for

which the person has a certified handler certificate and the expiry date of the certified handler certificate;

- the product or chemical name and amount of the tracked substance under the control of the competent person at any one time;
- the exact location of the substance, to allow an inspector to locate the substance within the times mentioned above;
- details of any transfers of the substance to another location such as the product or chemical name of the transferred substance, the identity and address of the PCBU or competent person receiving it and the date of transfer;
- information about the disposal (including use) of the tracked substance, including how, when and where it was disposed of and the quantity disposed of;
- the unique identifiers of containers of vertebrate toxic agents (VTAs) containing certain active ingredients.

2.7 Record of Use

Records of use are generally required whenever VTAs are applied in a place where members of the public may lawfully be present, or where the substance might leave the place via air or water¹. The record must be kept for at least 3 years and include:

- the name of the substance;
- the date and time of each application or discharge of the substance.
- the classification or classifications of the substance;
- the amount of the substance applied or discharged;
- the location where the substance was applied or discharged;
- the name of the user of the substance and the user's address.

These requirements can be met by ensuring the post-operational report specifies the required matters. Alternatively, they can be incorporated into the tracking form. While not all VTA's are required to be tracked, and most VTA's used in a public place do require a record of use, there is nothing to prevent a field worker meeting both tracking and record of use requirements in one set of documents.

Under the new Hazardous Property Controls (HPC) notice issued by the EPA, the Record of Use requirements are much the same as under Health and Safety at Work (HSW) regulations. However, there is one additional requirement – your record of use under HSW must also have the additional information required under Hazardous Substances (Hazardous Property Controls) Notice 2017 48(3)(g) “*other measures taken to ensure there are no significant adverse effects beyond the boundary of the application area.*”

¹ Applies to class 6.1A, 6.1B, 6.6A, 6.7A, 6.8A, 6.9A, 8.2A, or 8.2B substances. Brodifacoum for instance, is not included in this list.

PART.3 FORMS AND GUIDELINES FOR USE

3.1 Record Structure

Most Certified Handlers will need to maintain at least two separate personal folders. One folder will be kept at the Hazardous Substance Store (the “store”), and the other will be carried with them in their vehicle as they go about their work.

The folders must be readily available to anyone who might handle the substance and, in accordance with Part 2 of the Hazardous Substances (Identification) Regulations 2001, must also have a section containing a copy of the Safety Data Sheet (SDS) for each substance held.

While having two or more folders per person may seem inefficient, remember that tracked substances attach to an **Approved Handler** and at a **place**.

Example.

John takes delivery of 5 tubes of cyanide and records the receipt in his personal record as they go into the store. This record is kept near the store. When John takes two tubes out of storage to use in the field, he is now a “PCBU” of substances at two different places. Namely, the cyanide at the store and the cyanide in the field. The record of the 3 tubes of cyanide remaining at the store must remain at the store and the record of the 2 tubes in the field must be kept in John’s vehicle.

John would only need one folder to maintain records if he (a) never takes delivery of product, being responsible for field work only, or (b) has an administrative role, taking delivery of product and being the person in charge of the store but never doing field work.

John would need more than two record folders if he were to work from several stores.

In each folder, the “store” folder, and the “field” folder, John will keep a separate record sheet for every substance he uses. This is strongly recommended because an approved handler must be able to show how much of a substance is in his or her control at any time – necessitating a running total to be kept. This can become very confusing, if not impossible, if one form is used for different substances.

The system described here assumes that John both receives product, and uses product from one location. And he is not alone, as Henry can also receive and use product from the same store, as explained further below. This scenario allows us to describe a system that should be able to be used or easily modified for any situation.

3.2 The Store Form

While every Certified Handler has a folder for the store form, this can, of course, be one master folder, tabbed for every Approved Handler to maintain their separate personal records. So we still have one master store folder.

Under each Certified Handler’s tabs, there will be separate forms for each of the tracked substances the Certified Handler is licensed for.

It might look like the example over leaf.

Tracking Record of Hazardous Substance - STORE

Scanned copy of Controlled Substances License

Scanned Copy of Business Card, showing at a minimum full name, address (must be the same as the Hazardous Substance Store address), and position in the organisation.

Substance

Date	ID Number	In	Out	Total Held	Transfer Detail		Disposal Detail		
					Approved Handler	Organisation	Approved Handler	Place	Method

3.3 The Field Form

The field form is designed only to track and record *use* of substances. It might look like this.

Tracking Record of Hazardous Substance - FIELD

Scanned copy of Controlled Substances License

Scanned Copy of Business Card, showing at a minimum full name, address (must be the same as the Hazardous Substance Store address), and position in the organisation.

Substance

Date	ID Number	In	Out	Total Held	Transfer Detail		Use Detail	
					Approved Handler	Organisation	Place	Method

3.4 Explanation of the Forms

The fields of the forms should be completed to the following standards.

- **Substance:** a clear description of the substance or tradename (e.g. 0.15% 1080 pellets, Feratox capsules).
- **Date:** the date the product is received, transferred, used, recovered or disposed of.
- **ID number:** this must be a unique number which can identify a specific product lot. It may be presented as a sequence. That may mean you have to join several codes or numbers together, for instance the Purchasing Request Form (PRF), batch and pack numbers.
- **In/Out** the amount. This can be either by weight or volume or units.
- **Certified Handler:** state the name (at least first initial and surname) and organisation of the person. This may, in case of transport, be a DG license holder rather than a Certified Handler, or it might be a “competent person”.
- **Organisation:** company or organisation employing a Certified Handler. If self employed, say so.
- **Place:** a physical address or place description that will allow someone else to quickly locate the tracked substance.
- **Method:** of use or disposal.

3.5 Examples of using the Forms

How will this work? We will show how the 1080 pellet example will work for John and Henry. In this example, John is transferring to Henry for his use. But remember, that it would work exactly the same if John was using the product. He would then be transferring to himself, and the entries would be the same (other than name).

We explain the example below, and then show the two forms as they would have been filled out during this process. John and Henry both work for Fred’n’Bob Ltd.

- 1 John receives 100 kg of 0.15% 1080 pellets from Animal Control Products Ltd. (ACP) on 10 June 2007.
- 2 John transfers 40 kg of 0.15% 1080 pellets to Henry to go and kill some possums in a bait station operation at World’s End on 15 June 2007.
- 3 Henry uses 20 kg of 0.15% 1080 pellets on the 15th, and returns the other 20 kg back to the store, but maintains control himself (he could just as easily have transferred it back to John’s control, but for this example that did not happen).
- 4 On 30 June Henry recovers 10 kg of uneaten bait from the bait station and signs it back into the STORE (again he keeps control of it).
- 5 Henry then disposes of the uneaten bait on 10 July by burial in the local landfill, “Dump”.
- 6 On 26 July John transfers the 60 kg remaining in his control to Sly, a mate of his wife’s brother’s second cousin, who happens to be a Certified Handler in need of some product at his workplace.

The running totals at the end show that John has control of 0 kg of pellets in the store, Henry has control of 20 kg of pellets in the store. Of the original 100 kg, 10 kg are recorded as having been dumped, 10 kg are recorded as used, 20 kg remaining in Henry’s control in the store, and 60 kg

transferred to Sly. This may seem like excess paperwork, but it does work. At any time in the process, there is an exact record of the total amount of product in the control of each Approved Handler, and its location.

See the examples of the forms on the next three pages.

Tracking Record of Hazardous Substance - STORE

Scanned copy of Controlled Substances License
JOHN

Scanned Copy of Business Card, showing at a minimum full name, address (must be the same as the Hazardous Substance Store address), and position in the organisation.

Substance **0.15% 1080 PELLETS**

Date	ID Number	In	Out	Total Held	Transfer Detail		Disposal Detail			
					Approved Handler	Organisation	Approved Handler	Place	Method	
10/6/07	123XYZ	100kg		100kg						
15/6/07	123XYZ		40kg	60kg	Henry	Fred & Bob				
26/7/07	123XYZ		60kg	0kg	Sly	1 LUCKY PA PIMA				

Tracking Record of Hazardous Substance - FIELD

Scanned copy of Controlled Substances License

HENRY

Scanned Copy of Business Card, showing at a minimum full name, address (must be the same as the Hazardous Substance Store address), and position in the organisation.

Substance

Date	ID Number	In	Out	Total Held	Transfer Detail		Use Detail	
					Approved Handler	Organisation	Place	Method
15/6/07	123XYZ	40kg		40kg	John	Erwin Bil		
15/6/07	123XYZ		20kg	20kg			World's End	Brick Station
15/6/07	123XYZ		20kg	0	Henry	Erwin Bil		
30/6/07	123XYZ	10kg		10kg			World's End	Recovery
30/6/07	123XYZ		10kg	0kg	Henry	Erwin Bil		

Tracking Record of Hazardous Substance - STORE

Scanned copy of Controlled Substances License <div style="font-size: 2em; font-family: cursive;">HENRY</div>	Scanned Copy of Business Card, showing at a minimum full name, address (must be the same as the Hazardous Substance Store address), and position in the organisation.
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Substance 0.15 1080 PELLETS

Date	ID Number	In	Out	Total Held	Transfer Detail		Disposal Detail		
					Approved Handler	Organisation	Approved Handler	Place	Method
15/6/07	123xYz	20kg		20kg	Henry	Enoch Bil			
30/6/07	123xYz	10kg		30kg	h	h			
10/7/07	123xYz		10kg	20kg			Henry	DUMP	BURIAL

APPENDIX I: ABBREVIATIONS

1080	Sodium fluoroacetate
HPC	Hazardous Property Controls
HSW or HSWA	Health and Safety at Work Act
PCBU	Person Conducting a Business or Undertaking
PRF	Purchasing Request Form
SDS	Safety Data Sheet
VTA	Vertebrate Toxic Agent

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