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SIGNAGE

MINIMUM REQUIREMENTS FOR SIGNAGE WHERE VERTEBRATE TOXIC AGENTS ARE LAID OUTDOORS FOR PEST CONTROL

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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Published April 2018

National Pest Control Agencies
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This guide may be updated from time to time, so please check that your version is current by checking the publications section on **www.bionet.nz/library** or contacting info@bionet.nz.

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.

CONTENTS

PART 1. INTRODUCTION

1.1 Background and purpose

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

These guidelines apply where VTA's are laid outdoors in bait form. The legal requirements for signage in these circumstances are summarised with respect to content, design, installation, maintenance and recovery of signs.

The primary audience is field staff and contractors responsible for vertebrate pest control programs, and pest managers responsible for ensuring signs in use meet minimum standards.

1.2 Cautions

This document attempts to collate minimum legal requirements for signage in the field. It is not intended to be a detailed analysis of legislation.

This document **is not a Code of Practice**. Complying with this document provides no protection if legal requirements are not met.

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 the safe use of vertebrate toxic agents are also available. Those complementary guidelines should be read in conjunction with this specific commentary on signage.

1.3 Structure and Use of this document

Following this introductory Part One, there are two further parts. Part Two is about the practical application of the signage rules and regulations. Part Three is a more detailed consideration of the rules and regulations, and matters to consider, particularly for those who are not operating within an Approved Code of Practice.

1.4 Acknowledgements

Thanks to the expert working group involved in the preparation of these guidelines. We acknowledge the contribution of the Department of Conservation and the detailed review and commentary provided by other members of the expert working group.

PART 2. PRACTICAL SIGNAGE REQUIREMENTS

2.1 Signs on Department of Conservation (DOC) Lands

All Warning signs for pesticides operations carried out by DOC or on lands managed or administered by DOC must meet the DOC standards. Warning sign of any other design must not be used. http://www.doc.govt.nz/getting-involved/run-a-project/our-procedures-and-sops/managing-animal-pests/warning-sign-templates/

The relevant DOC SOP is “consultation and notification for pest operations” at http://www.doc.govt.nz/getting-involved/run-a-project/our-procedures-and-sops/managing-animal-pests/standard-operating-procedures/ The SOP includes an excellent summary of options and suppliers of various types of signage material and printing.

2.2 Read the Label

Requirements specific to the bait you propose to lay outdoors will be stated on the label. You must comply with label requirements.

2.3 Three Acts and Permissions

The signage requirements for hazardous substances remain largely the same following the shift to Health and Safety at Work Act 2015 (HSW) of the hazardous substances regulatory regime.

Requirements that stay the same include:

- — threshold quantities that necessitate displaying signs
- — the information that the signs need to include
- — the locations where you need to display the signs.

The signage requirements for class 9 (ecotoxic) substances also remain the same but are now set under the Environmental Protection Authority's (EPA's) Hazardous Substances (Hazardous Property Controls) Notice 2017 (the HPC Notice). To read this notice, see the EPA website at www.epa.govt.nz .

Some locations and substances have new signage requirements and the new regulations also explain your duty to maintain signs relating to hazardous substances.

You need to maintain your signs. This means updating the information on the signs as soon as practicable, if there is a change in the type, class or quantity of hazardous substances at your workplace that affects the type of signs you need to display. Keep your signs clean, in good repair and not covered or obscured.

If you store a class 6.1A, 6.1B, or 6.1C vertebrate toxic agent (VTA) or agrichemical at a temporary storage site outdoors (and not in a building or a room or a compartment in a building) you do not need to display signs. Such a site could be a temporary handling site for field bait or an aircraft loading site.

For more information on signage requirements, including some helpful example sign templates, see WorkSafe's guide – Hazardous substance signage - quick guide(PDF 54 KB)

If you are not sure whether you need signs for the substances and quantities at your workplace, use the WorkSafe Calculator to find out.

Remember that there may be additional signage requirements from:

- the EPA, via HPC notices;
- the Agricultural Compounds and Veterinary Medicines (ACVM) group at the Ministry for Primary Industries (MPI) under the ACVM Act. (These additional requirements, if any, will be found on the product label and must also be complied with);
- conditions imposed by permitting authorities. For example, on DOC lands, the DOC signage templates must be used.

2.4 Placement of Signs

You must put up warning signs at all normal points of entry to the treatment area when you use:

- Cyanide
- 1080 (sodium fluoroacetate)
- Phosphorus
- PAPP (para-aminopropiophenone)
- MZP (zinc phosphide)
- DRC1339 (starlicide)
- Sodium nitrite.

When using any other VTA, except for rotenone, in a place where there is public access you must post warning signs at every normal access point. This includes parks, reserves, roadsides and public rights of way.

2.5 What must be included on Signs to comply with ACVM Conditions

If signs must comply with conditions under the ACVM Act[1], then they must state;

a) that it is an offence for any person to remove the sign(s) prior to clearance of the area;

b) that it is an offence for any person (other than the applicator) to remove/move baits from the area;

c) warn of potential harm to dogs; and

d) only in the case of Brodifacoum bait for possum control, or bait containing cholecalciferol, a warning that feral animals may contain residues of the toxin and should not be taken for food.

For example:

- Unauthorised removal of signs or baits is an offence, and
- Restrain your dog
  or;
- Poison baits or carcasses are deadly to dogs, and
- Do not eat feral animals from the area.

There are no specific requirements for any particular size of signs or font size for writing. Signs should obviously be fit for purpose.

Section 23 of the ACVM Act allows the Director-General to place conditions on trade name products, including:

1 The applicable substances being brodifacoum, cholecalciferol, phosphorus, pindone, cyanide, 1080, MZP, PAPP.

23 Conditions on trade name products

(1) The Director-General may register a trade name product in accordance with section 21, subject to all or any of the following conditions: . . .

(m) Such other conditions as the Director-General considers necessary to achieve the purposes of this Act.

(2) A condition imposed in accordance with this section may apply to any specified class of person or to every person who imports, manufactures, sells, or uses a trade name product; and every person to whom a condition applies must comply with that condition.

MPI has placed conditions relating to signage on a range of VTA's. These conditions are on the label. ► E**nsure you check label conditions for up to date requirements**. Conditions for all VTA's can be found at http://www.foodsafety.govt.nz/registers-lists/ . However, the various resources on that website are not always up to date, so ensure you also check label requirements.

MPI requirements are in addition to any signage requirements imposed under the HSNO legislation. The following table summarises the relevant MPI conditions for signage in the field.

Substance	**Conditions relating to signage**
BRODIFACOUM POSSUM BAIT (No signage conditions for brodifacoum rodent bait)	**57.** If the product is applied where the public may have access to the treatment area, signs must be posted in prominent places around the perimeter of the treated area. The signs must remain in place until monitoring confirms that the product is no longer present. Signs must: a) state that it is an offence for any person to remove the sign(s) prior to clearance of the area; b) state that it is an offence for any person (other than the person(s) applying the product) to remove/move baits from the area; c) warn of potential harm to dogs; d) warn that feral animals may contain residues of the toxin and should not be taken for food. **54.** Signage must: • remain in place for a minimum of 9 months after baiting has ceased, and • in public areas, signs must remain for a period of 12 months after baits have been removed or destroyed.
CHOLECALCIFEROL	**57.** If the product is applied where the public may have access to the treatment area, signs must be posted in prominent places around

	the perimeter of the treated area. The signs must remain in place until monitoring confirms that the product is no longer present. Signs must : a) state that it is an offence for any person to remove the sign(s) prior to clearance of the area; b) state that it is an offence for any person (other than the person(s) applying the product)) to remove/move baits from the area; c) warn of potential harm to dogs; d) warn that feral animals may contain residues of the toxin and should not be taken for food. Where applied in biodegradable bait bags: – signs must be remain in place until baits are no longer toxic but must remain for no less than 4 months after the last application of bait. Where applied in contained bait stations: – signs must remain in place for no less than 3 months after: • baits have been retrieved or • are no longer present.
Any product containing: PHOSPHORUS, PINDONE, POTASSIUM CYANIDE, SODIUM CYANIDE, SODIUM FLUOROACETATE, PAPP, ZINC PHOSPIDE	**49.** If the label indicates the product can only be sold to and/or used by a person holding a ***controlled substances licence*** then the following apply. Signs must be posted in prominent places around the perimeter of the treated area. The signs must remain in place until monitoring confirms that the product is no longer present. Signs must: a) state that it is an offence for any person to remove the sign(s) prior to clearance of the area; b) state that it is an offence for any person (other than the person(s) applying the product) to remove/move baits from the area; c) warn of potential harm to dogs. ***Cyanide***: – signs must remain in place for not less than 2 months after the last date on which the paste was laid and until baits are retrieved, destroyed, have disintegrated or are no longer toxic. ***1080:*** – signs must remain in place until baits are retrieved or are no longer toxic, or until any other legal requirement affecting signage has been complied with. ***Pindone in contained bait station*** application: – signs must remain for 2 months after baits have been retrieved or if baits are

	not retrieved, signs must remain for 8 months after the last baits were applied ***Pindone*** where the product may ***only be bought or applied by a person holding a Controlled Substances License: –*** signs must remain until monitoring confirms that the product is no longer present. ***Phosphorus***: – signs must remain in place until baits are retrieved or when baits disintegrate or are destroyed but for no less than 1 month after the last baits were laid.
Any VTA not listed above.	No signage conditions from ACVM. Only HSNO Regulations apply.

2.6 Maintenance of Signs

All signs must be maintained in good condition until they are no longer required to remain in place. This will require regular checking, and the interval of checks will depend on the likelihood of damage, deterioration or vandalism. Where the Medical Officer of Health imposes conditions, he or she may include specific requirements for the maintenance of signs.

2.7 Recovery of Signs

The information tabulated below remains mostly relevant and correct. However, check the new HSW requirement, product label conditions, and any conditions imposed by permitting authorities for your operations to ensure ongoing compliance.

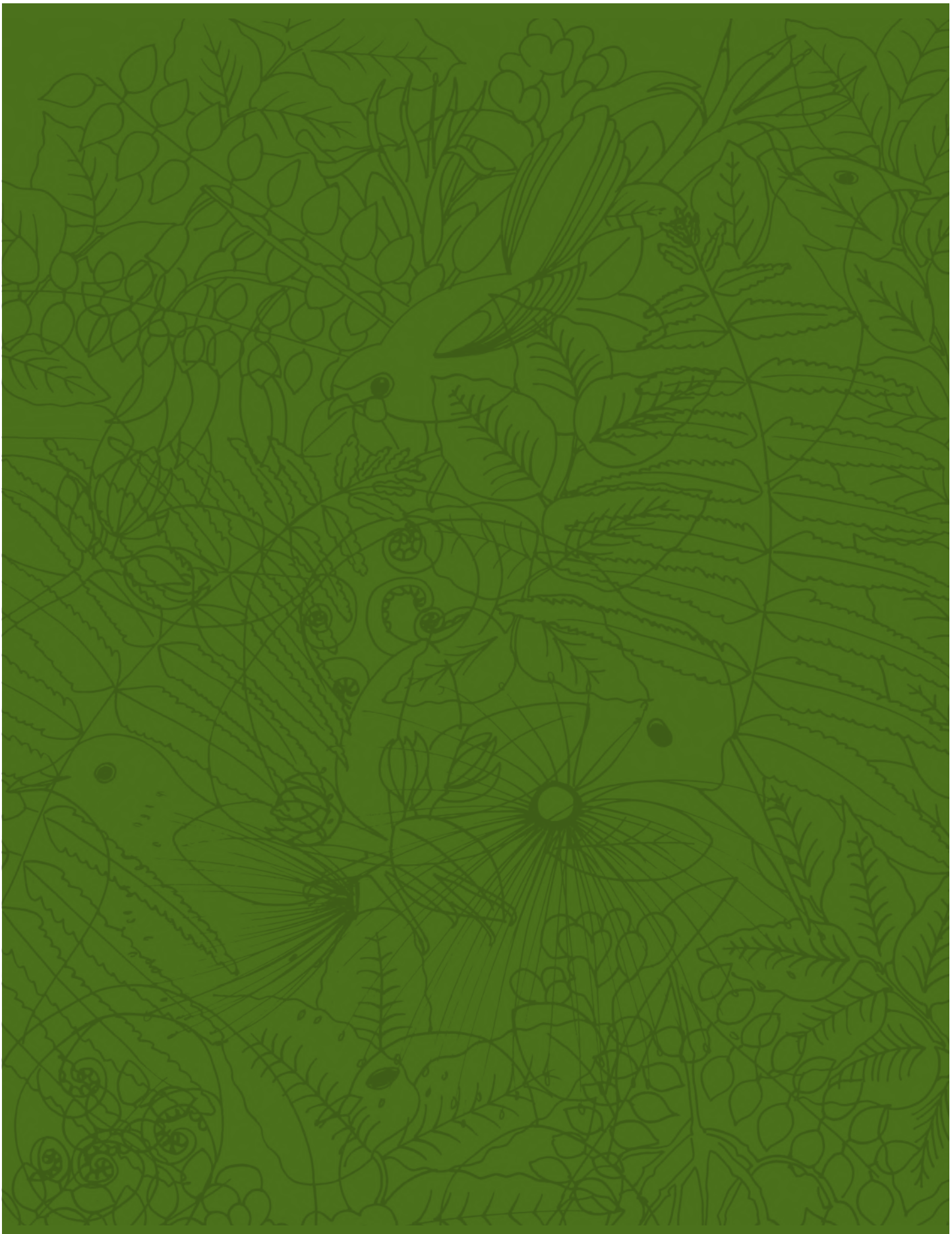
Substance and Use	**Recovery of Signs**
Sodium fluoroacetate (1080 poison)	Signs must remain in place until the latest of: • A minimum of 6 months, • or longer if bait or carcass monitoring demonstrates ongoing risk.
Alphachloralose	Signs must remain until baits are retrieved, have disintegrated or are otherwise no longer present at the place (e.g. eaten by birds).
Brodifacoum bait for possum control using bait stations.	Signs must remain in place for a minimum of 9 months after baiting has ceased but on lands to which the public ordinarily has access, signs must remain in place for 12 months after: • baits have been retrieved or

	• are no longer present.
Brodifacoum bait for rodent control in bait stations	Signs must remain in place for 12 months after: • baits have been retrieved or • are no longer present.
Brodifacoum bait for rodent control applied by aircraft.	Signage period for private land is not specified by the Code of Practice for Pestoff Rodent Bait 20R, but the public relations requirements of the Code imply signage as per public areas. If the area is one to which the public ordinarily has access, signs must remain in place for 12 months after the last application of the substance.
Bromadiolone	Signs must remain for 12 months after: • baits have been retrieved or • are no longer present.
Flocoumafen	Signs must remain for 12 months after: • baits have been retrieved or • are no longer present.
Coumatetralyl	Signs must remain for 2 months after baits have been retrieved or if baits are not retrieved, 8 months after the last baits were applied.
Diphacinone	Signs must remain for 2 months after baits have been retrieved or if baits are not retrieved, 8 months after the last baits were applied.
Cholecalciferol when laid in a biodegradable bait bag.	Signs must be remain in place until baits are no longer toxic, but must remain for no less than 4 months after the last application of bait.
Cholecalciferol when applied/ contained in bait stations.	Signs must remain in place for no less than 3 months after: • baits have been retrieved or • are no longer present.
Pindone contained ground based applications.	Signs must remain for 2 months after baits have been retrieved or if baits are not retrieved, signs must remain for

	8 months after the last baits were applied (no signage required on private land).
Pindone where the product may only be bought or applied by a person holding a Controlled Substances License.	Signs must remain until monitoring confirms that the product is no longer present.
Sodium Cyanide Paste Baits	Signs must be erected at every normal point of entry to the treatment area. Signs must remain until baits have been removed or have disintegrated or have been destroyed or are no longer toxic but signs must remain for no less than 2 months after the last baits were applied.
Potassium Cyanide Paste Baits	Signs must be erected at every normal point of entry to the treatment area. Signs must remain until baits have been removed or have disintegrated or have been destroyed or are no longer toxic but signs must remain for no less than 4 months after the last baits were applied.
Potassium Cyanide encapsulated Pellet Baits	Signs must be erected at every normal point of entry to the treatment area. If applied in biodegradable bait bags, signs must remain until the substance is no longer toxic but for no less than 4 months after baits were last applied. If applied in bait stations or other ground based means, signs must remain for no less than 2 months after baits have been retrieved.
Phosphorus	Signs must remain in place until baits are retrieved or when baits disintegrate or are destroyed but for no less than 1 month after the last baits were laid.
DRC1339	Signs must remain in place until baits are retrieved or when baits disintegrate or are destroyed but for no less than 1 month after the last baits were laid.
PAPP	Signs must remain in place until baits are retrieved or when baits are no longer toxic.
MZP	Signs must remain in place minimum 6 months, or until the date the substance or carcasses are no longer toxic or presents an exposure.

APPENDIX I: ABBREVIATIONS

1080	Sodium fluoroacetate
ACVM	Agricultural Compounds and Veterinary Medicines Act 1997
DOC	Department of Conservation
DRC1339	starlicide
EPA	Environmental Protection Authority
HSNO	Hazardous Substances and New Organisms Act
HSW	Health and Safety at Work Act
MPI	Ministry for Primary Industries
MZP	Microencapsulated zinc phosphide
NPCA	National Pest Control Agencies (winding up in 2018)
PAPP	Para-aminopropriophenone
VTA	Vertebrate Toxic Agent



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