

1080 Poisons Control Plan

Sample Answers

Sample Poisons Control Plan answers for **Licences to:**

- Manufacture and Sell or Supply of Perishable 1080 Pest Animal Baits (a Schedule 7 poison) by Wholesale; or
- Manufacture and Sell or Supply of Perishable 1080 Pest Animal Baits (a Schedule 7 poison) by Retail

*This document is intended to provide applicants with guidance regarding the level of detail that should be included in the Poisons Control Plan answers. A range of sample answers have been provided that may or may not be applicable to you. Please select from these samples **only** if they describe your circumstances. Otherwise, please provide the information that best describes your circumstances.*

1. The Licence

Licensed activities

1.1 Indicate the type(s) of activity to which the licence may apply;

- Manufacture of perishable 1080 meat bait.
- Manufacture of perishable 1080 liver bait.
- Manufacture of perishable 1080 carrot bait.
- Supply of perishable 1080 pest animal baits to landholders/ licensed pest control contractors/ Agsafe accredited local retail outlets/ licensed wholesalers.
- Supply of APVMA-registered 1080 pest animal baits to landholders/ licensed pest control contractors/ Agsafe accredited local retail outlets/ licensed wholesalers.

1.2 Indicate the position (or role) of the person(s) to be responsible for the periodic review of the approved 1080 Poisons Control Plan and the frequency with which the review is to occur;

- The Operations Manager will review the PCP at least annually and submit any proposed amendments for approval.

1.3 Indicate the manner in which the review of the 1080 Poisons Control Plan is to be documented and where the corresponding records are to be retained;

- The (DHS approved) copy of the PCP is to be retained, as a controlled document in a clearly marked folder, with the date of review and the signature of the reviewer to be clearly recorded on each occasion.

Location of documents

1.4 Indicate where the licence document is to be located;

- Displayed in.....(please specify).
- Filed in the office of the Operations Manager.

1.5 Indicate where the approved version of the 1080 Poisons Control Plan is to be located;

- In a clearly marked file in the office of the Operations Manager.

1.6 Indicate where copies of qualifications and accreditation of personnel involved in manufacture are to be located;

- In a clearly marked file in the office of the Operations Manager.

Personnel involved in manufacture and sale or supply

1.7 Provide details of qualifications of the person(s) who will manufacture 1080 perishable baits;

- Licensed pest controllers must complete Section A for each staff member who manufactures or assists in the manufacture of perishable 1080 pest animal baits. *Copies of qualifications and certificates of accreditation must be attached if not already provided with the Application for Responsible Person.*
- Manufacturers of a 1080 aqueous solution registered by the APVMA for the manufacture of perishable 1080 pest animal baits should complete Section B.

2. Reference Material

2.1 Indicate where these reference materials are to be accessed or located;

- A copy of the *Drugs, Poisons and Controlled Substances Act 1981* and the *Drugs, Poisons and Controlled Substances Regulations 2006* is held in the Operation Manager's office.
- The *Drugs, Poisons and Controlled Substances Act 1981* and the *Drugs, Poisons and Controlled Substances Regulations 2006* are accessed from the Internet when required.
- A copy of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Products (Using 1080 Aqueous Solution)* is held in the Operations Manager's office and is readily accessible to all manufacturing staff.
- A copy of the *Standard for the Uniform Scheduling of Drugs and Poisons* is held in the Operation Manager's office.
- A copy of the *Standard for the Uniform Scheduling of Drugs and Poisons* is held by...*(please specify)...* and is available for reference.
- A copy of the APVMA permit number 8781 is held in the Operation Manager's office.

3. Security of the Premises

3.1 Indicate the security measures that are to be taken to prevent misappropriation of APVMA registered 1080 aqueous solution or perishable 1080 pest animal baits by external or internal agents (eg. burglars, staff, contractors);

- High perimeter fence with barbed wire on top and lockable gates.
- Fencing (specify type of fencing) and lockable gates.
- Lockable gates.
- Deadlocks on all external doors.
- Monitored alarm system with infrared and movement detectors.
- Audible alarm system.
- After hours patrol by contracted security company.
- Security lighting.

4. 1080 Aqueous Solution

4.1 Indicate who will be responsible for the purchase of APVMA registered 1080 aqueous solution;

- The Operations Manager places all orders for the purchase of APVMA registered 1080 aqueous solution.
- All orders for the purchase of APVMA registered 1080 aqueous solution to be authorised by the Operations Manager.
- APVMA registered 1080 aqueous solution will be obtained from...(please specify).

Storage of 1080 Aqueous Solution

4.2 Describe the facility used to store AVPMA registered 1080 aqueous solution;

- A locked metal cabinet, with appropriate signage to indicate the storage of 1080 aqueous solution.
- A lockable storeroom, separated from other goods.

Access to storage facilities for 1080 Aqueous Solution

4.3 Indicate how unauthorised or unsupervised access is to be prevented;

- The Operations Manager holds the key to the locked cabinet/ locked storeroom used to store APVMA registered 1080 aqueous solution.
- Only those persons listed in section 1.7, of this Poisons Control Plan, hold keys to the locked cabinet/ locked storeroom used to store APVMA registered 1080 aqueous solution.

Records of Transactions for 1080 Aqueous Solution

4.4 Indicate how records of transactions are to be retained;

- Copies of invoices are to be filed chronologically on the premises in a secure cabinet.
- A bound book is to be used to chronologically record the purchase, subsequent use and remaining balance of 1080 aqueous solution held in stock.
- Computerised records are to be used to detail all transactions relating to 1080 aqueous solution with back-up copies stored off-site.
- All records are kept for at least 3 years.

Preventing Supply of 1080 Aqueous Solution

4.5 Indicate systems in place to ensure that the sale or supply of APVMA registered 1080 aqueous solution does not occur;

- New staff are instructed that 1080 aqueous solution cannot be supplied under any circumstances.
- Existing staff are regularly reminded that 1080 aqueous solution cannot be supplied.

Waste Disposal of 1080 Aqueous Solution

4.6 Indicate the manner in which such waste material is to be handled;

- Waste material containing 1080 aqueous solution will be disposed of by.....(please specify).
- 1080 aqueous solution is disposed of in accordance with the product label, MSDS and all relevant Acts, Regulations, Codes and statutory requirements.

5. Manufacturing of Perishable 1080 Pest Animal Baits

5.1 Describe the facility in which perishable 1080 pest animal baits will be manufactured, including plant design and construction, plant condition and repair, spill containment and disposal and placarding;

- The premises are constructed of brick with a concrete bunded floor.
- The premises are purpose built.
- The premises are converted from a (please specify).
- The manufacturing area is situated in a spacious open area with exhaust ventilation.
- A small office area is located at the front of the building.
- The premises are placarded with dangerous goods placarding.
- The premises does not require dangerous goods placarding because....(specify why not).
- Spillage will be contained and disposed of in accordance with Section 11 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Products Using 1080 Aqueous Solution*.

5.2 Outline safety directions to be followed when preparing perishable 1080 pest animal baits;

- Measures listed in Section 6 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution* will be adhered to.

5.3 Describe the equipment and ingredients to be used in the preparation of meat and/or liver baits;

- Equipment and ingredients to be used during the preparation of meat and/or liver baits are the same as the equipment and ingredients listed in Section 8.1 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.

5.4 Outline the procedure to be followed to prepare a meat bait and/or liver bait;

- The procedure followed to prepare meat bait is the same as the procedure listed in Section 8.2 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.
- The procedure followed to prepare liver bait is the same as the procedure listed in Section 8.3 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.

5.5 Describe the equipment and ingredients to be used in the preparation carrot bait;

- Equipment and ingredients to be used during the preparation of carrot bait is the same as the equipment and ingredients listed in Section 9.1 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.

5.6 Outline the procedure to be followed to prepare carrot bait;

- The procedure followed to prepare carrot bait is the same as the procedure listed in Section 9.2 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.

Finished Goods / Batch Documentation

5.7 Indicate the type of batch records to be used;

- Computerised records.
- Documents that are manually completed during manufacture.
- Daily workbook.
- All documentation in accordance with ISO accreditation.

5.8 Indicate how batch numbers are to be generated and attached to finished goods;

- Batch numbers are to be generated using the date of manufacture and bait type and are to be attached to the container using a label gun.
- Batch numbers are sequential and are to be printed/stamped onto the label during manufacture.

Finished Goods / Quality Assurance

5.9 Indicate how quality control is to be monitored;

- Manufacturing records will record the number/type of baits treated and 1080 volumes used.
- Meat baits are visually checked for uniform dye distribution.
- Carrot baits are visually checked for uniform dye distribution.
- Baits that are outside the weight/size range will not be treated or supplied.
- Baits where there is doubt about the amount of 1080 aqueous solution will not be supplied.

Labelling & Packaging

5.10 Indicate how label content is to be verified;

- Label content complies with Section 7.1 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution* and includes the date of bait manufacture.
- An external consultant is to be employed to design and verify that labels are in compliance.

5.11 Indicate how labels are to be prepared;

- Computer generated at the licensed premises.
- Printed by an external contractor.

- Photocopied onto standard format labels prior to batch manufacture.

5.12 Outline the procedures followed to securely attach the correct label to a manufactured product;

- Rolls of printed labels for each bait type are to be stored in clearly segregated areas.
- Labels are to be printed specifically for each batch without producing any excess labels.
- Label reconciliation procedures are to be included in the batch documentation.
- All containers are manually checked to ensure that the label is securely attached.

5.13 Indicate how compliance with container specifications is to be achieved;

- Rigid and resealable containers are to be used and have been tested under typical field conditions and comply with Section 10 of the *Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Baits Products Using 1080 Aqueous Solution*.

Prevention of cross contamination

5.14 Indicate how cross contamination between untreated substrate and perishable 1080 pest animal baits is to be prevented;

- Designated areas are to be used for the preparation of untreated substrate and for manufacturing perishable 1080 pest animal baits.
- The premises, including substrate preparation and bait treatment areas and equipment, are thoroughly cleaned and dried at the end of each batch.
- Storage areas of untreated and treated baits are separate.
- The elbow length PVC gloves used to handle 1080 aqueous solution and perishable 1080 pest animal baits are not used to handle untreated baits.

Handling of 1080 contaminated manufacturing waste

5.15 Indicate the manner in which such waste material is to be handled and disposed of;

- Waste material is disposed of in accordance with instructions on the product label, MSDS and all relevant Acts, Regulations, Codes and statutory requirements.

6. Storage and Stability of Perishable 1080 Pest Animal Baits

6.1 Indicate how perishable 1080 pest animal baits are to be stored;

- Perishable 1080 pest animal baits are stored in a locked temperature controlled facility.
- Perishable 1080 pest animal baits are stored in an area that the public cannot access.
- Perishable 1080 pest animal baits are stored in an area well separated from untreated baits.

Stability of Perishable 1080 Pest Animal Baits and Bait Substrates

6.2 Indicate how temperature is to be controlled and monitored within storage area(s);

- Thermostatically controlled refrigeration unit.
- Temperature-monitoring device, located within the refrigerator, is connected to a monitored alarm system to indicate that refrigeration has failed.
- Minimum/maximum thermometer, located within a refrigerator, is to be checked each day to confirm that the specified temperature range has been maintained.

- Refrigeration temperature is recorded manually in an exercise book.
- Refrigeration temperature is recorded in computerised form.

6.3 Indicate what action is to be taken when refrigeration has failed or has been shown to have failed;

- Baits are checked and if substrate quality has been compromised the baits are discarded and not supplied.

7. Sale / Supply of Perishable 1080 Pest Animal Baits

7.1 Indicate how orders, sales and supply of perishable 1080 pest animal baits are to be handled to ensure that the purchaser has the necessary authorisation;

- Supply is only made to persons who can demonstrate they are authorised persons as described in the *Directions for the Use of 1080 Pest Animal Bait products in Victoria*.
- The Bait User Declaration included in Appendix A of the *Directions for the Use of 1080 Pest Animal Bait products in Victoria* is completed by the bait user and co-signed by the supplier prior to bait supply.
- Manufacturing staff have undergone Agsafe personnel accreditation.
- Staff are to request proof of age to check the person is over 18 years of age.

7.2 Indicate what despatch and delivery procedures are to be used to ensure that consigned orders are delivered to the correct client;

- Dedicated delivery vehicles are used and a signed receipt is to be required for all deliveries.
- All deliveries are to be carried out by staff members.
- Contract carriers are to be used with a signed receipt obtained for all deliveries.

Temperature control during delivery [if required]

7.3 Indicate how temperature control, during transportation, is to be achieved;

- Items are only to be dispatched when delivery can be guaranteed that day.
- Baits are to be transported in insulated containers with ice bricks.
- Baits are to be transported in refrigerated containers.

Exceptional Orders

7.4 Indicate how exceptional requests may be identified and what action is to be taken;

- Staff will be periodically (at least annually) reminded to advise the Operations Manager of any exceptional orders that may be received. Such orders are to be reviewed and bona fides of order verified by the Operations Manager before supply occurs.

Records of Transactions of Perishable 1080 Pest Animal Baits

7.5 Indicate how records of transactions are to be retained;

- A bound book is to be used to chronologically record transactions of perishable 1080 pest animal baits.
- Computerised records are to be used to detail all transactions relating to perishable 1080

- pest animal baits with back-up copies stored off-site.
- Records are kept for greater than 3 years.

Returned 1080 perishable Baits

It is advised that manufacturers do not accept returned perishable 1080 pest animal baits.

7.6 Indicate how returned perishable 1080 pest animal baits are to be handled and stored (if applicable);

- Returned perishable 1080 pest animal baits are not accepted.
- Returned baits are to be placed in a locked store until they can be disposed of.

7.7 Indicate what records are to be made in relation to returned perishable 1080 pest animal baits (if applicable);

- Returned perishable 1080 pest animal baits are not accepted.
- Returned goods are to be credited, to client's accounts, and will appear as negative entries in those records.
- Details of returned goods are to be recorded in a logbook with reasons for return.

Disposal of Returned Goods

7.8 Indicate the manner in which returned perishable 1080 pest animal baits are to be disposed of (if applicable);

- Returned perishable 1080 pest animal baits are not accepted.
- Returned goods will be disposed of in accordance with instructions on the product label, MSDS and all relevant Acts, Regulations, Codes and statutory requirements.

8. Staff Training

8.1 Indicate how staff training and information are to be provided to employees;

- Staff members qualified as per section 1.7 are to be personally instructed by experienced personnel and supervised until a satisfactory level of competence is achieved.
- All staff are involved in an annual review of procedures and documentation.
- All procedures are to be documented, in accordance with ISO 9002 accreditation, with staff instructed in the implementation of those procedures.
- All manufacturing and supply staff will be qualified as per section 1.7 before being able to manufacture and supply the perishable 1080 pest animal baits.
- The Operations Manager will oversee staff qualified as per section 1.7 to ensure that a satisfactory level of competence is demonstrated.

9. Emergencies

Relevant staff should be trained in emergency procedures and have ready access to emergency service contact numbers including the Poisons Information Centre.

9.1 Indicate procedures to be followed in the event of an emergency and how relevant staff members are to be supervised and periodically re-trained to address an emergency situation;

- Emergency service numbers are displayed prominently in an area that is accessed by all staff.
- Formal training is conducted in emergency procedures with all staff, at least annually.
- The local doctor/hospital is informed that 1080 manufacturing occurs onsite.

10. Complaints and Adverse Incident Reporting

10.1 Indicate the manner in which complaints and other adverse incidents are to be documented and addressed;

- Any complaints are to be recorded, for prompt review by the Operations Manager, in order to identify any possible problems with product integrity, content or unauthorised supply.
- Discrepancies noted during physical stock checks of the 1080 aqueous solution or perishable 1080 pest animal baits are to be recorded on incident sheets and, if not resolved, are to be reported to the Operations manager for further investigation and/or mandatory reporting to the Department of Human Services and the Victoria Police.
- Theft of records relating to the APVMA registered aqueous solution or perishable 1080 pest animal baits is to be reported to the Department of Human Services.
- Adverse incidents relating to public safety, will be reported to the Department of Human Services.
- Adverse incidents relating to occupational health and safety or the environment will be reported to the relevant authority.