PEST CONTROL RESEARCH

8 Centrum Lane
Izone Rolleston 7614
03 372 1580
info@pcr.co.nz

Date 4th April 2019

Selwyn District Council
PO Box 90
Rolleston
Attn: Jesse Burgess

Dear Jesse

Application to change conditions of Resource Consent 145650

Please find attached an application to change conditions of the above resource consent. Attached are:

- A completed application form (Form 10).
- Appendix 1 – PCR Site Master File
- A letter of support from the Minister of Conservation in relation to the proposal

Information contained in the PCR Site Master File is commercially sensitive, and it is requested that this document be withheld from any request for information made under the Local Government Official Information and Meetings Act 1987. It is considered that this information could be reasonably with held under section 7(2)(b)(i) and (ii) of this Act.

Please contact Heather McKay on 021 388 249 or heatherm@wcrc.govt.nz in regard to this application.

Yours faithfully,

Ian Hunter
Operations Manager
Pest Control Research

Pest Control Research Application to vary Resource Consent ID 145650 under Section 127 of the Resource Management Act 1991.

Planning Unit
Application to Change or Cancel
Resource Consent Condition(s)

Section 127 Resource Management Act 1991 - Form 10
Send or deliver your application to: Selwyn District Council, PO Box 90, Rolleston 7643
For enquiries phone: (03) 347-2868
For enquiries email: planninginfo@selwyn.govt.nz

1. About this form
This form is to be used where an applicant seeks to change or cancel one or more conditions of an existing resource consent under Section 127 of the Resource Management Act 1991. It must be accompanied by the application fee together with supporting information.
Has a copy of the application been submitted electronically, i.e. on a flash drive or disk?
(Note: Providing an electronic copy can reduce the overall administration costs associated with the application.)

Yes provided electronically via email in word and PDF versions.

2. The Agent / Consultant
Name of Agent (include the contact person's name if a company, trust or similar): Heather McKay, West Coast Regional Council
Mobile: 021388249
Email: heatherm@wcrc.govt.nz
Postal Address: 388 Main South Road, Paroa, Greymouth

3. The Applicant (Note: The Applicant is responsible to the Council for all costs associated with this application)
Full Name: Pest Control Research Limited (PCR)
Mobile: 03 372 1580
Email: Postal Address: PO Box 7223, Christchurch 8023
Signature of Applicant (Or person authorised to sign on behalf of Applicant)

Signature: .....

Date: 4th April 2019

Name: IAN N HUNTER.

4. The Existing Resource Consent
My application relates to the following resource consent number: 145650
Address or site: 8 Centrum Lane, Rolleston

5. Change Sought

Background
Since commencing operations at the site PCR has undertaken continuous improvements to its operation that has led to the need to alter conditions within the existing resource consent it operates under. The continuous improvements have focussed on reducing risk to the employees and contractors on and off site, which in turn better protects the public.

The continuous improvement has led to significant investment into plant and infrastructure that provides a safer operation while ensuring less than minor effects on the environment. The improvements include improved filtered ventilation, more efficient and safer plant, infrastructure and overall health and safety.

The current resource consent conditions leads to duplication in regulatory responsibility, parts of the variation application seek to simplify reporting in this area, whilst ensuring that the stringent requirements of the various pieces of legislation are reported on and not diluted. PCR have examined methods to report more efficiently through to the various regulators including MPI, ACVM, Worksafe, Selwyn District Council and ECAN.

Not included in this application (CRC193692) is the air discharge resource consent PCR are seeking from Environment Canterbury. This application has been accepted by Environment Canterbury under Section 88 of the Resource Management Act 1991 (letter attached) and is in process.

Proposed Changes

The details of the proposal and conditions proposed to be changed / cancelled are:

Condition 1

Current wording:

1. That the proposal is carried out substantially in accordance with the information submitted with the application and further information provided.

Proposed amendment:

1. That the proposal is carried out substantially in accordance with the information submitted with the application and updated information provided as part of the resource consent variation application in March 2019.

Condition 3

Current wording:

3. That the Consent Holder provides evidence of approval from the Ministry of Primary Industries for the formulation of ready-products containing Brodifacoum, Cholecalciferol, Pindone and Sodium fluoroacetate, prior to storage and manufacturing operations commencing at the site.

Proposed amendment:

3. That the Consent Holder provides evidence of approval from the Ministry of Primary Industries for the formulation of Vertebrate Toxic Agents (VTA's), prior to storage and manufacturing operations commencing at the site.

Reasons

As stated in the background to this resource consent variation application the company has made significant improvements to the operation on site. These improvements have focussed on safety within and outside the factory. The original resource consent 145650 was applied for prior to the company gaining a number of approvals from various regulatory agencies in relation to the manufacture of Vertebrate Toxic Agents (VTA's). Therefore a significant portion of the background text within the resource consent decision and application has been superseded and is now considered irrelevant.

Attached as an appendix to this application is an updated site master plan along with the various approvals from regulatory agencies. This master plan will be updated as best practice guidelines and other legislative requirements change over time.

Further Information
PCR supplies a number of clients all over New Zealand with VTA's, nontoxic pre feed and hardware used in the pest control industry.

PCR intends to import some materials from overseas and source materials where it can locally throughout New Zealand. Aligned with safety improvements on site some changes to manufacturing will occur through the production of VTA's. This process is designed to make the on-site operation safer and reduce risks. The change to the bait production is captured by the necessary approvals from ACVM, which are in the process of being applied for.

The activities on site will entail storage and manufacture of hazardous substances. The quantity of hazardous substances on site shall be in accordance with a Hazardous Substance Location (HSL) certificate as issued under the Hazardous Substances Regulations 2017, Health & Safety in the Workplace Act. Included within this HSL certificate the company is required to ensure it has adequate procedures etc. in place to avoid impact to human health and the environment, this includes bunding, ventilation and health and safety requirements.

All hazardous substances are required to have approval under the Hazardous Substances and New Organisms (HSNO) Act, which imposes controls that are designed to manage any risk from using, storing, transporting and disposing of the substance. Such legislation applies to the management of both active ingredients and formulated products. The Environmental Protection Authority (EPA) administers the HSNO Act. PCR has obtained the necessary approvals and is periodically audited by the EPA (last audit Dec 2018).

The Ministry for Primary Industries (MPI) is responsible for the administration of the Agricultural Compounds and Veterinary Medicines (ACVM) Act and associated regulations which seek to manage risks to animal welfare, agricultural security, public health and trade from the use of agricultural compounds which includes most ready to use bait formulations containing a hazardous substances as the active ingredient. PCR has registrations from MPI for a number of VTA formulations. PCR is an approved manufacturer and is subject to periodic auditing by MPI to maintain these approvals.

Worksafe New Zealand is the government agency responsible for administration of the Health and Safety in Employment (HSE) Act and associated legislation. HSE legislation seeks to manage hazards to employees, contractors and other persons that may be harmed as a consequence of activities in a workplace. Worksafe New Zealand also undertakes certain regulatory functions pursuant to the HSNO Act including the certification of persons seeking statutory licences and the enforcement of HSNO legislation in a workplace context. PCR employs both approved/certified handlers and staff with CSL as required by WorkSafe and the EPA. At least 1 staff member holding a Controlled Substance Licence (CSL) shall be present on site during the manufacture and handling of toxic VTAs.

As technology advances so will the production of VTA's and other products to meet future demands throughout the country. The company will investigate and potentially implement changes to the way it operates and will communicate these changes through the site master plan. Should any future changes trigger the need for further resource consents these would be applied for at such time.

The business is seasonal with large production periods typically during the winter months. During these busier periods the company will comply with Rule 22.4.1 in the Selwyn District Plan.

The site itself contains a 10m high building of approximately 900m^2 in floor area. An office and amenity complex occupy approximately 100m^2 in a corner at the front of the building. A small laboratory is located within the building for analysis and quality assurance purposes. There is currently a temporary removable portacom located in the carpark area outside the main building. This is providing additional staff lunch space with no permanent utility connections while changes to the main building are designed and consented. Sufficient parking remains for staff and operations on site. The temporary portacom will be removed from site following an additional break out space for staff meal breaks being built inside the current building. It is anticipated building consents for this work will be sought in mid-2019 for target completion by the end of 2019.

Other than when received inwards from time to time, active ingredients will only be handled during transfer from the dangerous goods storage facility to the batching facility and through the processing equipment. To minimise the risk of particulate transfer outside the factory environment the active ingredients will only be handled where possible in liquid form only, decanted and weighed by appropriately certified and skilled personnel wearing suitable Personal Protective Equipment (PPE) for use only within the factory environment. This purpose built batching facility on site will replace the process which currently takes place in the laboratory facility of dissolving powder in water which is a hazardous activity. This change will be key to the improved safety on site.

Decanting and other equipment will be set up in the batching facility to avoid double handling and additional exposure risk in the process. Where this is undertaken approval will be sought from the regulatory authority (ACVM and HSNO) and the activity will be undertaken in accordance with best practice and where possible avoid handling materials in powder form.

While being handled during preparation for the manufacturing process, the active ingredients will be processed within a fully enclosed batching area fitted with fume and dust extraction and handling. The fully enclosed batching area with fume and dust extraction avoids handling and is considered a safer way of handling the materials. This methodology

avoids risk to personal on site and anyone off site as the area is fully enclosed with its own fume and dust extraction equipment.

The containment system will exhaust clean air to the factory exterior via a 3m stack and dust collected will be returned to the manufacturing process at intervals.

In regard to transportation inwards hazardous chemicals are moved by specialist chemical transport companies to comply with insurance and Hazardous Transportation requirements.

Changes also allow for the assessment of effects to be focussed on the Vertebrate Toxic Agent and its Hazardous substance classification rather than the specific product. If another VTA is produced by the company in the future, the requested change allows the company to go through the regulatory process with MPI without requiring further variations to the resource consent. This does not dilute the stringent requirements the company is required to meet through these regulatory processes.

These changes allow Selwyn District Council to regulate this activity by ensuring that the stringent requirements set through the MPI process are adhered to.

Assessment of activity against Objectives, Policies and Rules in the Canterbury Regional Council Regional Policy Statement and the Selwyn District Plan

The company believes the original assessment remains accurate and notes the air discharge resource consent application with ECAN.

The activity remains in accordance with the objectives and policies in the Canterbury Regional Council Regional Policy Statement and the Selwyn District Plan. Rule breaches are insubstantial and the effects of these are less than minor in nature.

Was there any pre-application advice/discussion prior to this application being made?

Yes

If Yes, what was the Planner's Name?

Meeting with Jesse Burgess and other Selwyn District Council staff.

6. Assessment of Effects

Assessment of any effects on the environment in accordance with Schedule 4 of the Resource Management Act 1991.

This section MUST be completed to a level of detail that corresponds with the scale and significance of the effects that a change to, or cancellation of, the conditions may have on the environment. (Use additional pages if necessary).

The changes sought are less than minor in nature and essentially include a change to the manufacturing process and referring to VTAs rather than a number of individual products.

The changes to the manufacturing processes are part of ongoing improvements at the site. As discussed earlier, these changes are not expected to have any adverse effects on the

environment and will improve health and safety and both environmental and personal risk at the site.

The change to refer to VTAs rather than a number of individual substances will allow flexibility in the future without burdening both the company and Selwyn District Council with applications for variations for any new or different products in the future. As noted earlier, the hazardous products used are comprehensively regulated by other agencies, and any changes would need to receive the relative approvals from these agencies. It is therefore not considered that there are any additional environmental effects from this proposed change.

7. Privacy Information

All the relevant information on this form is required to be provided under the Resource Management Act 1991 for Selwyn District Council to process your application. Under this Act this information has to be made available to members of the public, including business organisations. The information contained in this application may be made available to other departments of the Council. You have the right to access the personal information held about you by the Council which can be readily retrieved. You can also request that the Council correct any personal information it holds about you.

8. Information

1. All applicants are asked to check the accuracy of the information supplied. Inaccuracies in information supplied can cause difficulties at a later date, such as additional costs, delays and legal proceedings initiated by the Council and/or by other persons.

2. The required **Deposit** must be paid before processing of any application will start.

3. The application for resource consent under the Resource Management Act 1991 is in addition to any building consent application required under the Building Act 2004.

4. When this application is lodged with the Selwyn District Council, it becomes public information and is available for public inspection. If there is commercially sensitive information in the proposal, please let us know.

5. **If your application is inadequate, it may be returned unprocessed**. If additional information is required, you will be advised and processing of the application will be suspended until the information is received. To avoid delays and cost it is in your best interests to submit a complete application.

Office Check

··Information received and complete **yes / no** Resource consent #: _____ Date: _____

··Receipt #: _____

Hon Eugenie Sage

Minister of Conservation
Minister for Land Information
Associate Minister for the Environment

Minita mō Te Papa Atawhai
Minita mō Toitū Te Whenua
Minita Tuarua mō Te Taiao

14 OCT 2013

Michael Meehan
Chief Executive
West Coast Regional Council
By email: mm@wcrc.govt.nz

Dear Michael

Department of Conservation requirement for *Sodium Fluoroacetate (1080)*

Thank you for updating me on the work Pest Control Research Limited are doing to produce 1080 baits to support the Department of Conservation's predator control programme across New Zealand.

I am informed by the Department that a six-year contract is now in place with Pest Control Research Limited (PCR), and that the contract has the provision to be extended by another four years from its initial expiry date. I understand that commencing from September 2018, PCR will supply Pestex 1080 bait products to the Department of Conservation (DOC). I understand that the Pestex product contains 0.15% Sodium Fluoroacetate (1080), and that the bait will be used in DOC's predator control programme.

PCR's Pestex bait will be an important tool to help achieve DOC's predator control goals. I have committed DOC to delivering an expanded predator control programme over the next 4 years. As you are aware, New Zealand is facing a biodiversity crisis, with urgent action required to halt the decline of our native species. Results from ongoing research into pest control techniques show that the carefully controlled application of 1080 baits are hugely beneficial for our native wildlife. 1080 is ideally suited for use in New Zealand because, while introduced mammals are extremely vulnerable to the poison, monitoring shows that most native species are not at significant risk from 1080 operations. The government continues to invest in research to alternatives to 1080 as part of the vision for a predator-free New Zealand. However, it is likely that 1080 will continue to play an important role and it is currently our most effective tool for controlling pests.

Pest Control Research Ltd is endorsed by the Government of New Zealand to source, purchase, import and store Sodium Fluoroacetate (1080), subject to the usual approval requirements under New Zealand law, as regulated by the Ministry for Primary Industries (MPI).

+64 4 817 8727 Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand e.sage@ministers.govt.nz beehive.govt.nz

PEST CONTROL RESEARCH

Pest Control Research LP: Site Master File 2019

General information of Pest Control Research LP:

Contact information on the manufacturer

Company Name:	Pest Control research LP
Postal Address:	Pest Control research LP, PO Box 7223, Christchurch
Physical Address:	8 Centrum Lane, Izone, Rolleston 7675
Phone (office):	+64 3 372 1580
Email:	info@pcr.co.nz

Fig 1. The factory located at 8 Centrum Lane, Rolleston.

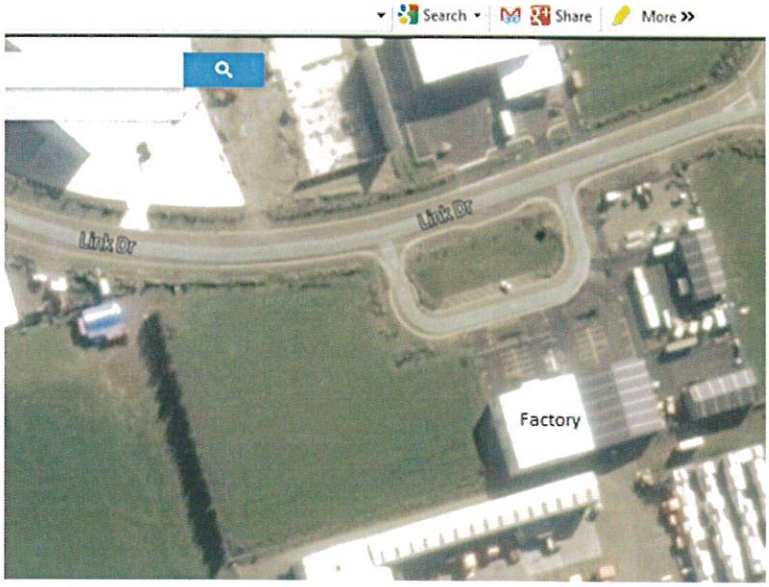


Fig 2. Site location of the factory.

PEST CONTROL RESEARCH

Pest Control Research LP (PCR) is a Christchurch-based research, development and product supply company, established in 2000, with the goal of promoting and improving all aspects of animal pest control and pest monitoring in New Zealand.

Company Focus:

Our company focuses on providing customers with options to control or eradicate introduced animal pests such as possums, rats, stoats, weasels, ferrets, feral cats, hedgehogs and rabbits. These animals have had a major impact on the viability of our native bird and plant populations and in many cases have caused local or total extinction of species.

Why we need to control animal pests:

Animal pests need to be controlled or eradicated if we want to pass on our natural heritage to future generations. Failure to do so will mean the extinction of even more species adding to the already long list of extinctions that have occurred since the arrival of man to our shores. We also need to control animal pests to protect our farm industries from the transfer of diseases from wild animals to our domestic herds which threatens our country's economy.

PCR products:

We have a fantastic line of animal pest control products that are primarily focused on the control and monitoring of animal pests in our native and farm environments. We are focused on protecting our native forest and our native birds that are increasingly coming under pressure from the threat of extinction through predation by introduced animal pests. We are also focused on helping to eliminate Tb (bovine tuberculosis) from our domestic herds by producing new and existing products that control wild animal vectors that carry Tb and infect our farm animals.

Company collaboration, consultation & commitment:

PCR has excellent collaborative links with other research organisations including Canterbury (www.canterbury.ac.nz) and Lincoln Universities (www.lincoln.ac.nz), the Department of Conservation (www.doc.govt.nz) , TbFree (www.tbfree.org.nz), and Landcare Research (www.landcareresearch.co.nz) . We also provide consultation and technical support services to City and Regional Councils, private forestry, farming, research and environmental consultancy companies, iwi and community groups who require pest management strategies, solutions and product supply. Everyone at PCR is committed to providing you with highly efficient products and top quality service because we know you are committed to helping preserve our native flora and fauna.

Personnel

Refer to *PCR Org Chart.*

Authorised and proposed manufacturing activities at the site:

Four vertebrate toxic agents (VTAs) are authorised to be manufactured at the PCR factory:

1. Pindone Rabbit Pellets, ACVM registration number V004110
2. Pindone Possum and Rat Pellets, ACVM registration number V004396
3. Pindone RS5 Rabbit Pellets, ACVM registration number V004478
4. PESTEX®®, ACVM registration number V009602

The manufacturing of these products is authorised by the Ministry of Primary Industries (MPI; see Good Manufacturing Practice certificates in Appendix 1). The manufacturing procedures for the products are detailed in the accompanying documents, "SOP for the Manufacture of Vertebrate Toxic Agents containing Pindone" and "Standard Operating Procedures for the manufacture of PESTEX®.

The manufacturing process:

Manufacturing is done in a purpose-designed plant that includes two high-quality pellet presses, extrusion equipment and associated mixing, loading, cooling, screening and packaging machinery. This type of machinery is commonly used for the manufacture of stock-feed. The plant is designed to efficiently, effectively and safely manufacture cereal pellets to a standard that complies with MPI Good Manufacturing Practices. The business operates multiple plants so that different products can be manufactured on separate machinery to prevent cross-contamination.

The active ingredient (HSNO 6.1A) of the PESTEX is synthesized from a less toxic (HSNO 6.1B) precursor via a simple 1 step saponification reaction. This saponification reaction is supported by a number of international academic publications and proper risk assessment of this process is performed. This manufacturing process is occurring on PCR site with dedicated purpose built plant. Additional isolation controls, engineering controls, administration controls and PPE controls are placed to ensure the final risk level of this process is minimised.

Once the active ingredient (AI) is produced, it will be used for the PESTEX manufacturing in stage 4. The PESTEX manufacturing details are summarised in its production SOP and the entire process is handled by certified handlers (all have Controlled Substances License).

PCR's manufacturing operations have been externally audited by MPI three times, as follows:

Date of Audit	Factory Location	Auditing Authority
7 Nov 2008	70 Shortland Street, Wainoni, Christchurch	New Zealand Food Safety Authority
24 Jun 2011	70 Shortland Street, Wainoni, Christchurch	New Zealand Food Safety Authority
25 Jun 2015	8 Centrum Lane, Izone, Rolleston	Ministry of Primary Industries
20 Aug 2016	8 Centrum Lane, Izone, Rolleston	Worksafe New Zealand
16 Oct 2017	8 Centrum Lane, Izone, Rolleston	Ministry of Primary Industries
28 Nov 2018	8 Centrum Lane, Izone, Rolleston	Canterbury Employers Chamber of Commerce
05 Dec 2018	8 Centrum Lane, Izone, Rolleston	Environmental Protection Authority

The following diagram (**Diagram 1**) describes the full manufacturing flow-chart of the PCR product PESTEX V009602; the other substances V004110; V004396 & V004478 have many commonalities with the PESTEX manufacturing process.

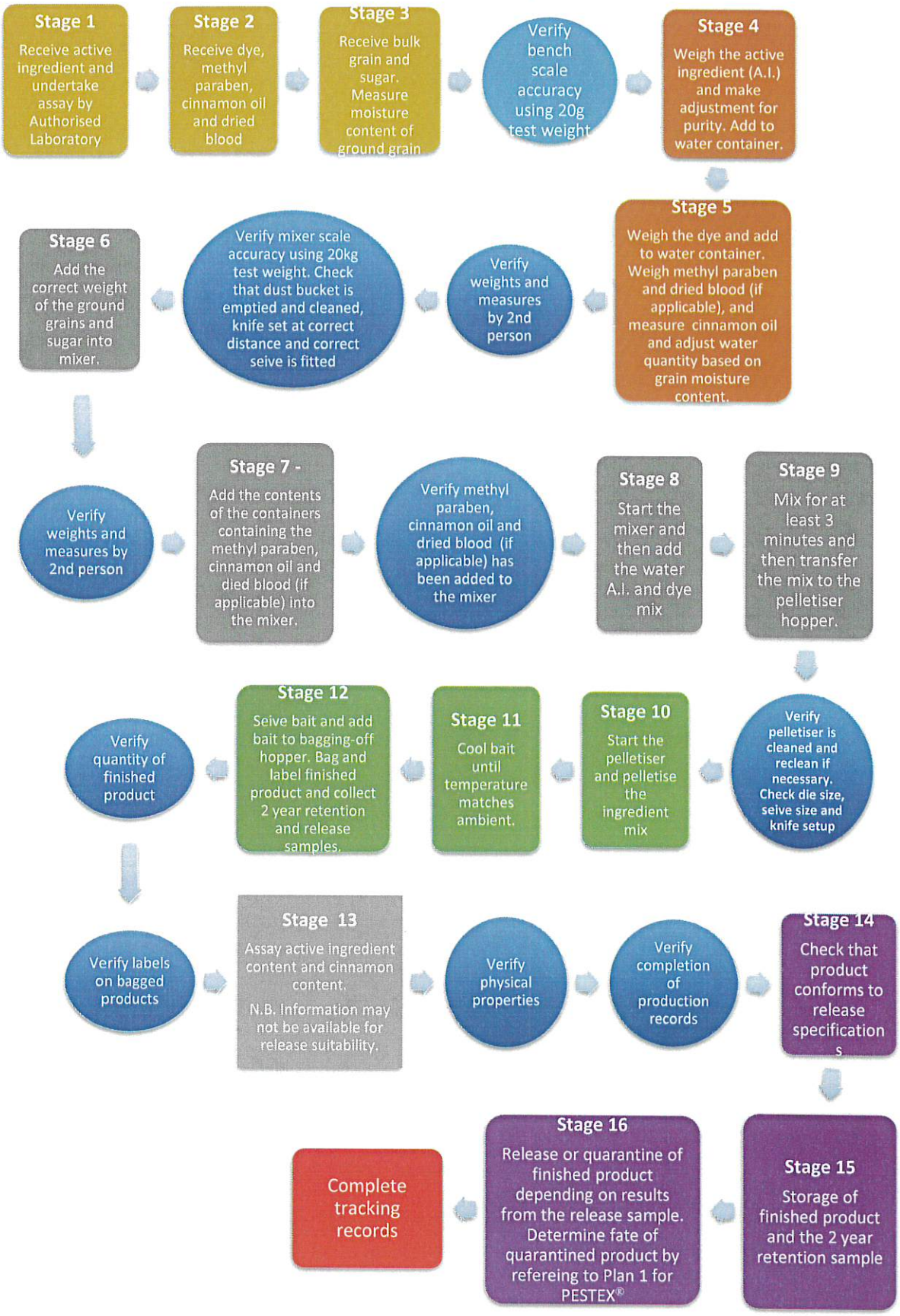


Diagram 1: PESTEX manufacturing process

Quality control procedures

The following critical quality control procedures are followed during and after the manufacturing of the PESTEX® and Pindone products. These processes are each described in above section.

- Date recording and moisture checks of bulk grain
- Weighing of AI, methyl paraben and dye
- Weighing bulk ingredients
- Inspection and analysis of bait physical properties and AI content
- Assays of Active Ingredients (AIs)
- Retention samples for future reference

A full list of accreditations and certifications for PCR manufacturing are listed in the table below. Copies of these certificates can be found in the Appendices, as listed.

Accrediting Body	Accreditation	Reference
Ministry of Primary Industries	Certification of GMP compliance to manufacture baits containing pindone and 1080	Appendices 1 & 2
Ministry of Primary Industries	Certificate of Registration for PESTEX®	Appendix 2
Selwyn District Council	Resource Consent to store and manufacture bait products	Appendix 3
VTA Licensing	Test Certificate for storage disposal use and manufacture of VTAs	Appendix 4

Release procedure of finished products

Staff responsible

Within the company we have a large group of certified handlers (with Controlled Substances Licences) who are responsible for the batch certification and release procedures. The certified handlers all have extensive experience handling and manufacturing VTAs. The QC team is responsible for quarantine and release of finished product.

Release process

The final product specifications and the process for product release are outlined in the SOPs for each product.

Management of suppliers and contractors

Contact details are located in the PCR ERP SYSTEM database (Appendix 5).

Suppliers of active ingredients

Pindone powder

Please refer to PCR ERP SYSTEM.

Sodium fluoroacetate (1080)

As mentioned from the above section.

Suppliers of non-active ingredients

Methylparaben (preservative)

Please refer to PCR ERP SYSTEM.

Cinnamon oil (flavour)

Please refer to PCR ERP SYSTEM.

Flavadon (flavour)

Please refer to PCR ERP SYSTEM.

Green dye (colourant)

Please refer to PCR ERP SYSTEM.

Suppliers of bulk ingredients

All bulk ingredients are recorded on the Inward Goods Record when they arrive at the factory (see details in the SOPs for Pindone and PESTEX®).

Ground barley and maize

Please refer to PCR ERP SYSTEM.

Sugar

Please refer to PCR ERP SYSTEM.

Granular Molasses

Please refer to PCR ERP SYSTEM.

Suppliers of bags and labels

Please refer to PCR ERP SYSTEM.

Risk Management

Seismic events

The ECan GIS database indicates that Lot 636 is underlain by "Eyre shallow sandy loam." A geotechnical investigation by Aurecon in July 2009, corroborated by bore logs in the ECan GIS database for wells within a 500m radius, indicated specifically that the site is comprised of a thin layer of topsoil overlying gravels to depth. The site and surrounding area are not known to have suffered any liquefaction or other damage during the Canterbury earthquakes of 2010 and 2011. Given ground level storage and a

low beam height for elevated storage it is unlikely that a seismic event exceeding the design limits of the racking would cause any manufactured product to be spilt from packaging.

Sabotage and theft

The front of the building and yard are enclosed by security electric fence and mesh to obscure view. Two gates provide drive-through access for heavy vehicle and trailer combinations carrying goods to and from the facility.

The facility is equipped with a monitored security system, which includes recorded surveillance of the building. Security cameras are installed and the production site can be remotely viewed by the operations manager. The alarm system is also remotely monitored by a security company, and the facility manager or police can be alerted to any unauthorised access or suspicious activity.

All active ingredients are stored in the locked Class 6 Dangerous Goods Shed, which is always closed and locked except when receiving or removing chemicals. No manufactured products are stored outside of the building.

The front of the building has a motion-activated alarm which, once triggered, must be deactivated on the key panel inside the office within a specified period. This alarm is monitored by a security company who rings both the factory manager and operations manager if an intrusion is detected. The security company is informed if these contacts do not respond and they will then make a site inspection to prevent criminal activity. The concrete panel construction used for the sides and rear of the building have no penetrations that could be forced for access. The yard gates are locked at all times and the alarm activated outside of working hours to comply with insurance requirements.

Hazardous substance spills

The building floor is a concrete slab coated with a high-performance epoxy paint system to create an impermeable surface. All construction joints have been sealed to prevent build-up of dust or spilt materials, as well as to eliminate pathways for contamination of underlying ground strata.

Spill management kits are located inside the factory to contain any spillage that could potentially occur while active ingredients are being decanted or measured within the laboratory or when transferring them across the plant or adding them to the mixing hopper. To further reduce risk of spillage, the transfer and mixing of the active ingredients from the Dangerous Goods Shed to the laboratory only takes place while the vehicle access roller door is closed, so if an incident does occur no particles will be released beyond the factory environment.

Any spillage of manufactured product will be in the form of cylindrical cereal pellets, or partly formed pellets (depending upon manufacturing phase), which contain active ingredient at relatively low concentrations (0.15% for Pestex® and 0.025 and 0.05% for Pindone). Because products containing VTAs are required to incorporate a green or blue dye to indicate toxicity, any spilt pellets will be readily identifiable against the grey floor so they can be easily contained and recovered. While spill response actions are specific to each substance, they may include misting to limit any dust transfer and manual recovery to replace product in packaging and establish normal controls.

Personal protective equipment

The following personal protective equipment is used by staff who weighs chemical ingredients inside the laboratory.

- WorkSafe NZ compliant full respirator and self-contained respirator
- Protective rubber gloves
- Good standard full overalls
- Rubber gum boots.
- Steel-capped gum-boots

- Chemical resistant gloves

Boots are removed when entering the staff room. Any visitors entering the factory are required to sign in and out of a visitor's book.

Fire safety

The main fire risk in the building is grain and sugar used in the bait manufacture, as well as stockpiled manufactured bait products awaiting dispatch. Grains and sugars have a moderate flammability risk, with high concentrations of dust having a particularly high ignition potential in electrical environments.

The sides and rear of the building are constructed of tilt-slab concrete to achieve a 180/180/180 fire resistance rating (FRR) in accordance with New Zealand Building Code requirements. The building is protected by a monitored fire alarm and features a sprinkler system and warning system compliant with the fire safety requirements of the New Zealand Building Code. Storage racks are designed to ensure that bulk ingredients and manufactured products are stored in the lower part of the building to reduce fire risk to adjoining structures.

Groundwater contamination

Manufactured products are stored in HSNO compliant packaging to prevent spoilage from atmospheric moisture and the evaporation of attractants in the product. All manufactured product is stored on wooden pallets that are at least 100mm above floor level. Packaging will repel water and even if immersed would not pose any risk of contaminating groundwater.

Product quality reviews

Product quality control processes are outlined in detail in the SOPs for each product. Below is a summary of the quality review measures taken.

Inspection and analysis of bait physical properties and AI content

This is detailed in the product SOPs.

Assays of Active Ingredients (AI)

This is detailed in the product SOPs.

Retention samples for future reference

This is detailed in the product SOPs.

Quality Documents

All quality control and manufacturing procedures are recorded on purpose-designed record sheets and stored in hard copy in labelled folders for future internal and external audits. Internal audits are recorded on the Internal Audit Form (Appendix 6). Must be at least one year after completion of the expiry of the product manufactured, or five years from the date of manufacture when no expiry period has been established.

Documentation covering the following aspects is stored at the factory in locked filing cabinets:

- Staff organisation diagram
- Staff position descriptions
- Staff training records

- Material specifications
- Material certificates of analysis
- Material test/inspection and release records
- Product Master Formula
- Manufacturing procedures and batch records
- Final product specifications
- Quality control procedures and test records
- Packaging specifications
- Packing procedures
- Label reconciliation procedure and records
- Line clearance procedure and records
- Cleaning procedures and records
- Product distribution records
- Complaints procedure and records
- Product recall procedure and records
- Internal audit procedure and records
- Plant maintenance procedures and records
- Plant and system validation records
- Equipment calibration records

PREMISES AND EQUIPMENT

Premises

The PCR factory (Fig 1) is located at 8 Centrum Lane, Izone, and Rolleston. Access to the factory is via Link Road (Fig 2).

The factory is a 900 m^2 steel-supported and steel-beamed building. The exterior and interior walls at the back and sides of the building are tilt-slab concrete, while the front wall is colour steel. Access to the building is through a large roller door at the front of the building and through two standard doors each side of the roller door (see Fig 1). Signage detailing the pesticides contained in the building is located on or near the two standard doors.

The factory has been issued with a Building Compliance Schedule Statement by the Selwyn District Council (Appendix 7) and a Building Warrant of Fitness by SGS (Appendix 8).

8 Centrum Lane (Lot 636) is located on flat land, which the Environment Canterbury GIS database indicates is underlain by Eyre shallow sandy loam. A geotechnical investigation undertaken by Aurecon in July 2009, corroborated by bore logs for wells within a 500m radius, indicated that the site is comprised of a thin layer of topsoil overlying gravels to depth.

The site and surrounding area are not known to have suffered any liquefaction or other damage during the Canterbury earthquakes of 2010 and 2011. Other than storm water reticulation the nearest surface waterway is located approximately 400m away near Hoskyns Road.

Factory floor plan

The factory floor plan with the location of the separate plant areas for toxic and non-toxic bait products, the office and amenities area, ordinary goods storage areas and dangerous goods storage is in Appendix 9.

The factory has a self-enclosed office/staffroom/laboratory/shower wash-down area with 2 separate toilets each with a washbasin. Staff eating areas and toilets are separate from production areas. The Pindone Area is dedicated to weighing and processing materials for the manufacture of Pindone

Baits while the Pestex Area is dedicated to the weighing and processing materials for the manufacture of Pestex Baits.

All materials and finished products are stored and contained in well-demarcated areas well away from the storage of raw materials to prevent any cross-contamination. There is a clear pathway that raw materials pass through in the factory from being received and stored through to distribution of the completed and appropriately packaged product.

Equipment

Pelletising Plants

The pelletising plants (Fig 3) that manufacture the cereal pellets take up approximately one quarter of the available space in the factory.

Fig 3. The two pelletising plants located within the factory.

HEPA Filter Cabinet

Chemical ingredients including pindone powder, 1080 powder, methylparaben and green dye are weighed inside a HEPA Filter Cabinet, which is located in the laboratory/office complex (Fig 4). The chemical ingredients for each mix are weighed and then placed in a numbered container. The contents of each container are then added individually as needed to the mix in the mixing hoppers.

Fig 4. HEPA filter cabinet used to weigh chemical ingredients.

Cleaning Procedures

The Cleaning Guide and Cleaning Recording Sheet (Appendix 10 and 11) specifies cleaning that must be undertaken and recorded.

Plant Maintenance Procedures

Regular equipment maintenance

The following regular equipment maintenance should be conducted and recorded on the Plant Maintenance Record Sheet (Appendix 12):

1. Grease pelletiser rollers after each daily run.
2. Grease all bearings every 6 months.
3. Repair any breakdowns and record the outcome.

All critical weighing scales are calibrated annually by Toltec Scales, Christchurch. The calibration is recorded on the Weighing Equipment Calibration Record Sheet (Appendix 13). The annual calibration checks are conducted on these scales:

1. 500kg mixer on load cells
2. bagging-off scales
3. excipient weighing scales

Bird control

The factory is inspected every 6 months for bird entry points. If found, they are sealed using appropriate cladding materials. If there is any evidence of bird activity in the building, such as nesting material or droppings, potential entry points will be investigated and sealed as required. Remedial action is recorded in the Maintenance Schedule and Record Sheet (Appendix 12).

Rodent control

Four rodent bait stations are filled with Ditrac Rodent Bait Blocks are placed at four different locations around the factory (Fig 2). In addition, two mouse traps are set at the entrance to the bait stations. Bait stations and traps are checked every month and any rodent activity is recorded along with the appropriate action and outcome on the Maintenance Schedule and Record Sheet (Appendix 11).

Material management and warehousing

Storage of bulk goods

See details in the SOPs for Pindone and PESTEX®.

Date recording and moisture checks of bulk grain

See details in the SOPs for Pindone and PESTEX®.

Storage of chemical ingredients and printed bags.

All dangerous chemicals are stored in a purpose-built, lockable Dangerous Goods Shed (DGS in Fig 5). The DGS floor and a portion of the walls are permanently sealed to contain any spillage and assist clean-up of dry or liquid dangerous goods. The DGS is always locked when not in use and has labels affixed to the outside wall and door describing the nature and chemical classification of the dangerous goods it contains. Also attached is a dangerous goods description for Pindone and sodium fluoroacetate and the contact details for the production manager in case of an emergency. Safety data sheets (SDSs) for all chemicals and completed products are also attached to front of the door.

Fig 5. Purpose-built Dangerous Goods Shed where all toxic materials are stored.

Storage of manufactured product

Manufactured product is stored on 100mm high wooden pallets inside the building, either on the floor or on single-tier seismic racking with a beam height of 1.85m and a rated capacity of 2,400kg per beam. No manufactured products are stored outside the building.

Hazard warning signage

Hazardous substance warning signage (e.g., Fig 6) is installed at each vehicle gateway and at all exterior and interior accesses to the factory building. The purpose of this signage is to inform people (including emergency services) entering the location that hazardous substances are present, and to provide information about precautions that staff and visitors must take, such as wearing Personal Protective

Equipment if necessary. Warning signs are readable from 10m, and identify the hazard class of all substance groups present in the factory.

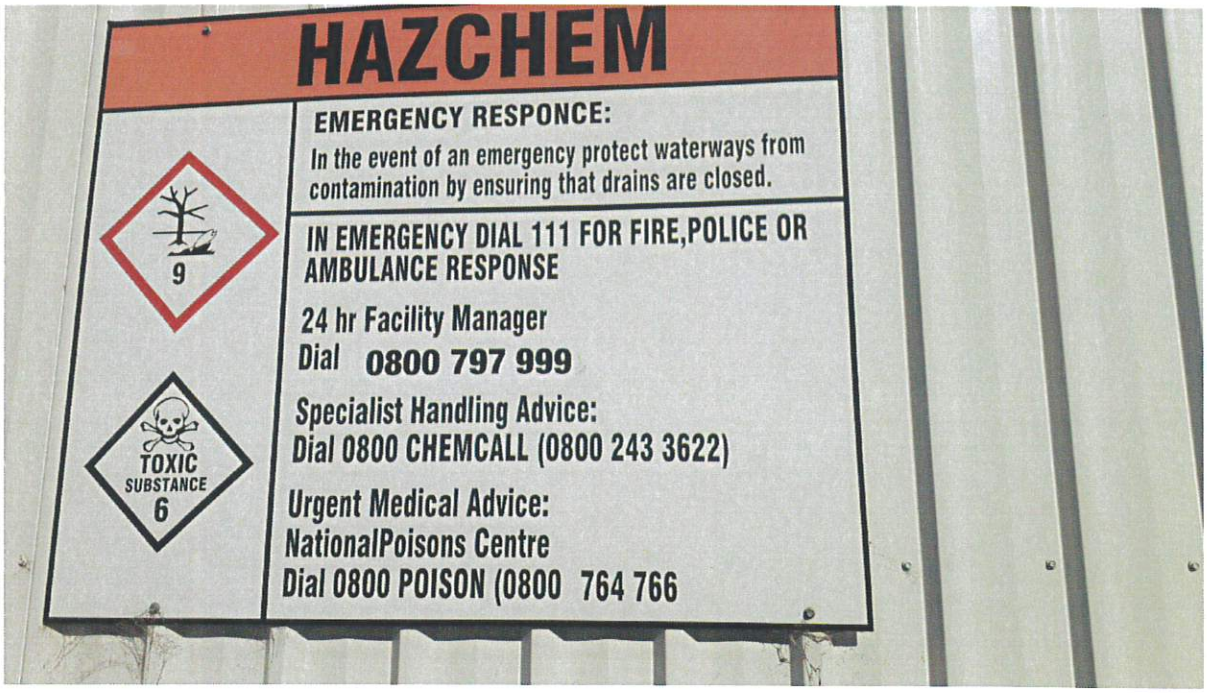


Fig 6. An example of the HAZCHEM signage used inside and outside the factory.

Waste Streams

A small volume of solid waste material is generated from maintenance and cleaning activities when production is switched between product lines. Such waste is typically comprised of cleaning materials such as cloths contaminated with dust or cereal residue containing toxins. All waste residues containing 1080 is collected and held inside 200L metal drums designated for toxic waste and periodically collected by ChemWaste Ltd, Ph 0800 246 978.

PACKAGING AND OUTWARD GOODS PROCEDURES

Packaging specification

1. Finished products are packaged in appropriately labelled, 25kg woven polypropylene bags that are internally sealed with a plastic film. These bags are pre-printed with the MPI approved labels.
2. All 25kg bags are closed with cotton thread using a commercial bag sewer.
3. Bait is also packed in 300-600kg woven polypropylene bulk bags for down- Each bulk bag has an accompanying MPI approved label detailing the product type, the batch number and the expiry date.

Packing procedures

The packing procedures for the Pindone and PESTEX® products are outlined in the SOPs for each product.

Label and bag reconciliation

All bags and labels that are received are counted prior to storage. The total numbers of bags and labels should be recorded on the Inward Goods Record Sheet and stored in the Inward Goods Folder.

The total number of bags and labels used is recorded on the Pindone and PESTEX® Bagging Sheets (see product SOPs). Every month the total number of bags and labels used during the month is checked against the Inward Goods Record Sheet and the Product Release Sheet to ensure no bags or labels have been lost.

Outward Goods Records

All finished product that is dispatched from the factory is recorded on the Product Release Sheet and stored in the Outward Goods Folder. Records include:

- product type
- batch number
- order number
- date of dispatch

QUALITY CONTROL

Quality control is undertaken at each of the following manufacturing stages:

1. Inward reception and storage of bait ingredients and packaging
2. Measurement and recording of the bait ingredients
3. Bagging and storage of the finished product
4. Measuring and recording the quality of the finished product

Receiving and storing inward goods

Quarantine and quality checks of inwards goods

All inwards goods used for the manufacture of Pindone and PESTEX® pellets are stored in the quarantine section of the factory until they are checked, approved and released for manufacturing. Quality checks for each of the inward goods are specifically outlined in the SOPs for Pindone and PESTEX® products. Details from the quality checks are recorded on the Inward Goods Record Sheets and stored in the Inward Goods Folder for at least two years.

Measuring and recording bait ingredients

The certified handlers (also Controlled Substances Licensees) are responsible for weighing and measuring all AI, dye, methylparaben, cinnamon oil and bulk ingredients to ensure consistency. Other controlled substance Licensees witness the weighing operations and sign the batch records jointly as a double check to ensure that the correct ingredient amounts have been added to the mixers. This stringent procedure ensures accurate and consistent bait formulation.

DISTRIBUTION, COMPLAINTS, PRODUCT DEFECTS & RECALLS

Distribution

Please refer to the product SOPs.

Transportation of dangerous goods

Comply with the Land Transport Rules for Dangerous Goods (appendix 14). Please refer to the product SOPs.

Complaints, product defects and recalls

Complaints

All complaints about PCR products are recorded on the Complaints and Rejected Product Record Sheet in the Pindone SOP or in the PESTEX® SOP.

Product defects

Please refer to the product SOPs. Customers and the ACVM will be notified of any deviations that exceed the thresholds specified in the table above as soon as the deviation is detected. A full report will follow as soon as possible.

Quality Assurance Requirements

Please refer to the product SOPs.

Product quarantining procedure

Please refer to the product SOPs.

Product recall procedure

Please refer to the product SOPs.

Appendix 2 Certificate of Registration for PESTEX®

Ministry for Primary Industries
Manatū Ahu Matua

Certificate of Registration

This Certificate of Registration is issued to:

Pest Control Research LP

of **8 Centrum Lane, RollestonCHRISTCHURCH**

The vetebrate toxic agent known by the trade name of:

PESTEX No. **V009602**

Is hereby registered under the Agricultural Compounds and Veterinary Medicines Act 1997

This registration expires on the 23rd day of May 2020

The conditions placed on this approval are attached.

Dated on this 24th day of May 2017 (Date of first registration was 23 May 2017)

Signed: Maree Zinzley
Manager Approvals Operations
Regulation and Assurance
Acting under delegated authority

MINISTRY FOR PRIMARY INDUSTRIES NEW ZEALAND

This certificate is a record of the product approval that was current on the date the certificate was issued. It reflects the public register entry for the product at that time. From time to time the wording of registration conditions may change, resulting in a change on the public register for that product. As a certificate is not necessarily re-issued for such changes, consult the public register for the current approval of the product

New Zealand Government *Growing and Protecting New Zealand*

Appendix 3. Selwyn District Council Resource Consent for PCR factory

RESOURCE CONSENT DECISION: 145650

Selwyn DISTRICT COUNCIL

Applicant:	Pest Control Research LP
Proposal:	To store and manufacture bait products.
Location:	8 Centrum Lane, Izone Business Park, Rolleston.
Legal Description:	Lot 636 Deposited Plan 464084 being 1598 square metres in area more or less, as contained in Certificate of Title 615761.
Zoning:	The property is zoned Business 2A under the provisions of the Partially Operative District Plan (Township) Volume.
Status:	This application has been assessed as a landuse consent for a discretionary activity under the Partially Operative District Plan. As such the relevant provisions of the Partially Operative District Plan (Township) Volume and the Resource Management Act 1991, have been taken into account.
This application was formally received by the Selwyn District Council on 5 December 2015. Assessment and approval took place on 20 April 2015 under a delegation given by the Council.	

DECISION

Resource consent 145650 is **granted** pursuant to section 104B of the Resource Management Act 1991 subject to the following conditions imposed under section 108 of the Act:

1. That the proposal is carried out substantially in accordance with the information submitted with the application and further information provided.
2. That the security measures detailed in Section 6.7 of the application be adhered to at all times.
3. That the Consent Holder provides evidence of approval from the Ministry of Primary Industries for the formulation of ready-products containing Brodifacoum, Cholecalciferol, Pindone and Sodium fluoroacetate, prior to storage and manufacturing operations commencing at the site.
4. Prior to storage and manufacturing operations commencing at the site, the Consent Holder shall provide a copy of its approved Site Master File to the Selwyn District Council. The file shall be prepared in accordance with the Agricultural Compounds and Veterinary Medicines Act, and shall include controls and standards for each phase of manufacturing, general requirements for worker health and safety (including the management of active and non-active ingredients), and procedures that must be complied with in the event of a spill, including immediate response action and reporting requirements.

5. Prior to storage and manufacturing operations commencing at the site, the Consent Holder shall provide the names and contact details for key staff responsible for the implementation of the Site Management File, including emergency contact details.

6. Prior to storage and manufacturing operations commencing at the site, the consent holder shall prepare and provide to Council a Site Environmental and Operational Management Plan.

7. The plan shall include as a minimum the processes and procedures documented in the Site Master File, and include other procedures to prevent the migration of dust or other contaminants outside of the manufacturing building.

8. That records of site inspections and surveys be kept and made available to Council staff upon request.

9. That any parking and loading areas which are required at night shall be illuminated to a minimum maintained level of 2 lux, with high uniformity, during the hours of operation.

10. That pursuant to section 128 of the Resource Management Act 1991, the Council may review all conditions by serving notice on the consent holder within 1 month of any 12 month period following the date of this decision, in order to deal with any adverse effects on the environment that may arise from the exercise of this consent.

NOTES TO THE CONSENT HOLDER

a. Pursuant to section 125 of the Resource Management Act 1991, if not given effect to, this resource consent shall lapse five years after the date of this decision unless a longer period is specified by the Council upon application under section 125 of the Act.

b. In accordance with section 36 of the Resource Management Act 1991, the Council's standard monitoring fee has been charged.

Yours faithfully
Selwyn District Council

Emma Larsen
Senior Resource Management Planner

Appendix 4. One of the test certificates from the PCR staffs

Certificate Number: 18/124VM

ADROIT SOLUTIONS

CERTIFICATE OF TRAINING

This is to certify that

DANIEL SCOTT

has completed training and assessment in

VERTEBRATE TOXIC AGENTS

LIFE CYCLES OF MANUFACTURE, STORAGE, TRANSPORT, USE AND DISPOSAL

- Personal Protective Equipment
- Record Keeping
- Maintenance & Hygiene
- Legislation
- Emergency Response
- Products and Labels
- Transport and Storage
- Use and Disposal
- Environmental Protection
- Cleaning and Decontamination

Date of Training: 26 October 2018

Peter G Chalmers
Compliance Certifier No TST 000046

ADROIT SOLUTIONS LTD - PO BOX 285 - GORE 9740 www.adroitsolutions.co.nz 027 2243520

Appendix 5. Contact details for ingredient suppliers

PCR ERP SYSTEM database.

Appendix 6. Internal Audit Record

ANNUAL INTERNAL AUDIT RECORD			
Date	**Audit Task**	**Audit Outcome**	**Staff sign off**
	Reconcile yield records inward with outwards goods documentation		
	Check all documentation has been undertaken		
	Check equipment calibration has been undertaken.		
	Review cleaning sheet to determine if cleaning has been undertaken		
	Review training documentation to ensure training has been undertaken		
	Check testing information to ensure Pindone assay tests have been undertaken and recorded		
	Check machinery maintenance documentation to determine if machinery is being maintained correctly		

Appendix 7: Selwyn District Council Building Compliance Schedule Statement.

Selwyn DISTRICT COUNCIL

Compliance Schedule Statement **R770582**

Section 105, Building Act 2004

The Owner

Name of Owner:	WEST COAST REGIONAL COUNCIL
Mailing address:	PO BOX 66, GREYMOUTH 7840
Street address/registered office:	
Phone number:	
Landline:	Daytime:
Mobile: 021 816 045	After hours:
Facsimile number:	
Email address:	seans@wcrc.govt.nz
Website:	

The Building

Street Address of Building:	8 CENTRUM LANE. ROLLESTON
Legal Description of land where building is located:	LOT 636 DP 464084
Valuation Number:	2354166419
Building Name:	WEST COAST REGIONAL COUNCIL
Location of building within site/block number:	STREET FRONT
Level/Unit number:	1
Current lawfully established use:	INDUSTRIAL
Year first Constructed:	2014

Specified Systems

The following specified systems are covered by the compliance schedule for this building:

SS1 Automatic systems for fire suppression
SS2 Automatic or manual emergency warning systems
SS4 Emergency lighting systems
SS7 Automatic back-flow preventers
SS14/2 Signs
SS15/2 Final exits
SS15/4 Signs for communicating information intended to facilitate evacuation

The compliance schedule is kept at:

This statement is valid for 12 months after the date stated below.

Brian Wilson on behalf of Selwyn District Council
Position: Building Official : Technical and Compliance

Date: 09/10/14

Appendix 8. SGS Building Warrant of Fitness

SGS

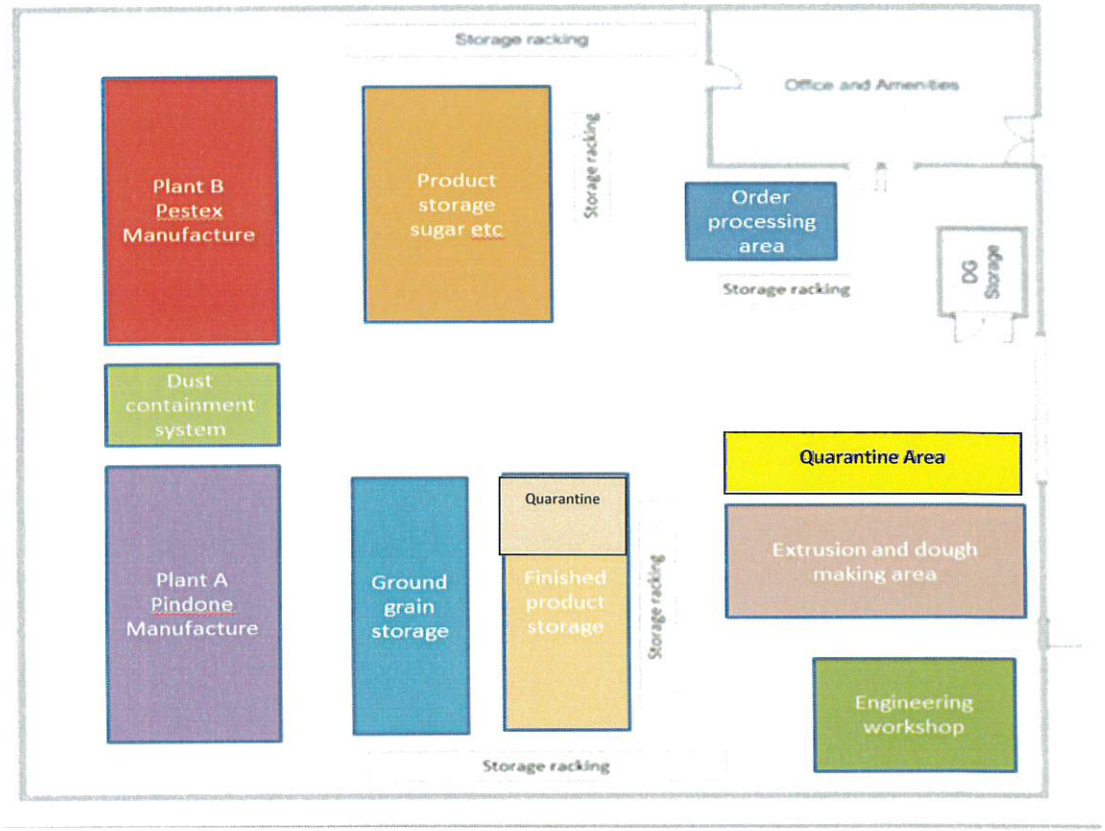
1510 WATERLOO RD 8042
P O BOX 8032
CHRISTCHURCH 8440
NEW ZEALAND
TELEPHONE +64 3 344 4510
FAX +64 3 344 4515

BUILDING WARRANT OF FITNESS

Form 12, Section 108, Building Act 2004 — **BWOF Expiry Date: 9th October 2017**

THE BUILDING					
Street address of Building: **8 Centrum Lane, Rolleston**			Legal Description of land where building is located: **Lot 636 : DP 464084**		
Building Name: **Pest Control Research**			Location of Building within site/block number: **Central**		
Level/Unit Number: **One level / One Building**			Current, Lawfully established use: **WL : Industrial & Office**		
Year first constructed: **2014**			Intended life of the building (if 50 years of less): **Indefinite**		
Highest fire hazard category for building use: **2**			Compliance Schedule No.: **R770582**		
THE OWNER					
Name of Owner: **West Coast Regional Council** Mailing Address: **Po Box 66, Greymouth 7840** Street Address: **388 Main South Road, Greymouth**			Contact Person: **Robert Mallinson – WCRC** Ph: **03 7680466** Cell: **021816045** E-Mail: **rb@wcrc.govt.nz**		
AGENT:					
Name of Agent: **SGS NZ Ltd** Contact: **Mr Allan Daines** Relationship to owner: **Duly Authorised Agent**			Phone: **03 344 4510** Cell: **0275 465 447** Mail Address: **P O Box 8032, Christchurch 8440** Email: **allan.daines@sgs.com**		
SPECIFIED SYSTEMS AS PER BUILDING ACT 2004					
√	1	Automatic sprinkler systems for fire suppression.	√	14/2	Emergency power systems for, or signs relating to, a system or feature specified in any systems 1 to 13
√	2	Automatic or manual emergency warning systems for fire or other dangers.	√	15/2	Final Exits and Other Exit Doors.
√	4	Emergency Lighting Systems	√	15/4	Signs for Communicating information intended to Facilitate Evacuation.
√	7	Automatic Water backflow preventer connected to a potable water supply.			
WARRANT					
The maximum number of occupants that can safely use this building is: **20 Persons**					
The inspection, maintenance, and reporting procedures of the compliance schedule for the above building have been fully complied with during the **12** month prior to the date stated below.					
The Compliance Schedule is kept at: **8 Centrum Lane, Christchurch**					
ATTACHMENTS:		a) Certificates relating to inspections, maintenance, and reporting (Form 12A) **3** b) Recommendations for amendments to the compliance schedule, if any. **0**			
Signature of Owner /or Authorised Agent:		**Name:** **Sean Kearns**		**Date:** 31-8-16	

Appendix 9. Factory Floor Plan



Appendix 10. Factory Cleaning Guide

CLEANING SCHEDULE				
Equipment name	**Frequency**	**Staff involved**	**How to clean**	**Notes**
Mixer	Before making non-toxic	Production manager & Ronald De Zwart	Fill with coarse crushed barley and run for 5 minutes. Empty and clean paddles with scrapper as necessary. Repeat full process if required.	
Elevators	Before making non-toxic	Production manager & Ronald De Zwart	Run coarse crushed barley and run for 5 minutes. Repeat full process if required.	
Pellet press	Before making non-toxic	Production manager & Ronald De Zwart	Pelletise with 20kg of coarse crushed barley. Repeat full process if required.	
Conveyer	Weekly	Production manager & Ronald De Zwart	Scrape clean with plastic hand shovel.	
Dust collector	Weekly	Production manager & Ronald De Zwart	Empty internal paper bags.	
Floor	Weekly	Production manager & Ronald De Zwart	Vacuum floor	
Walls	Annually	Production manager & Ronald De Zwart	Vacuum	
Rafters	Annually	Production manager & Ronald De Zwart	Vacuum	

Appendix 11. Factory Cleaning Record Sheet

CLEANING RECORD				
Date Cleaned	**Equipment cleaned**	**Reason for clean**	**Notes**	**Staff sign off**

Appendix 12. Maintenance Record Sheet

MAINTENANCE SCHEDULE AND RECORD SHEET					
Type of maintenance	Date of maintenance	Undertaken by?	Maintenance task	Effect on product manufacture	Notes

Appendix 13. Weighing Equipment Calibration Record Sheet

Scales Calibrated	Date Toltec Contacted to undertake calibration	Date Testing undertaken	Test Results	Certificate number	Staff sign off
Mixer Scales					
Bagging-off Scales					
Chemical Ingredient Scales					

PEST CONTROL RESEARCH

Appendix 14. Dangerous Goods Declaration Form

If this consignment is DGLQ or CONSUMER COMMODITIES this must be indicated in the space above.

Dangerous Goods Declaration

When completed this form meets the requirements of section 5.2 (2) of the land transport Rule: Dangerous Goods 1999

Sender/Consignor: (Name & Address)	**References:**
Telephone No:	Job No/Order No:
Recipient/Consignee:	**Carrier/Courier:**
Telephone No:	

UN Number	Class(es) or Divisions	Proper Shipping Name	Packing Group	Number/Type of Packages	Gross mass Volume (kg / L)

Additional Information:

Emergency Telephone No: or Dial 111 Emergency Services

Notes:

1. Where the Proper Shipping Name include the words "Not Otherwise Specified" or the letters "NOS" the technical Name of the goods must be included in the description.
2. Container and Vehicle Packing Certificates are provided on the reverse of this declaration
3. Non-dangerous goods may be included on this declaration but must be listed after the Dangerous Goods
4. Where Container Vehicle Certificates or Load Plans are not required under the Rule. Those sections on the reverse of this declaration can be disregarded.

Declaration:	**Name:**
I hereby declare that the information contained in this document is correct and that the contents of this consignment are correctly described and meet all the requirements of the Land Transport Rule: Dangerous Goods 1999 in respect to packaging, labelling and marking. I also accept the responsibility for the container/Vehicle Packing Certificate on the reverse of this form as specified in 5.2(7) and 5.2(9) of the Dangerous Goods Rule Yes / No / N/A	**Address:** **Date:** **Signature** _____

IN AN EMERGENCY DIAL 111 - FIRE OR POLICE

- Make the vehicle safe and isolate the site. Retrieve DG documents from the vehicle and follow any written instructions
- Keep the public clear and prevent smoking. Warn Traffic.
- Advise the emergency services (through a bystander if necessary) Include DG Information
- Contain spillages only if you can do so safely and have the appropriate safety equipment
- Follow all Instructions given by the police or fire service
- Advise Company Management