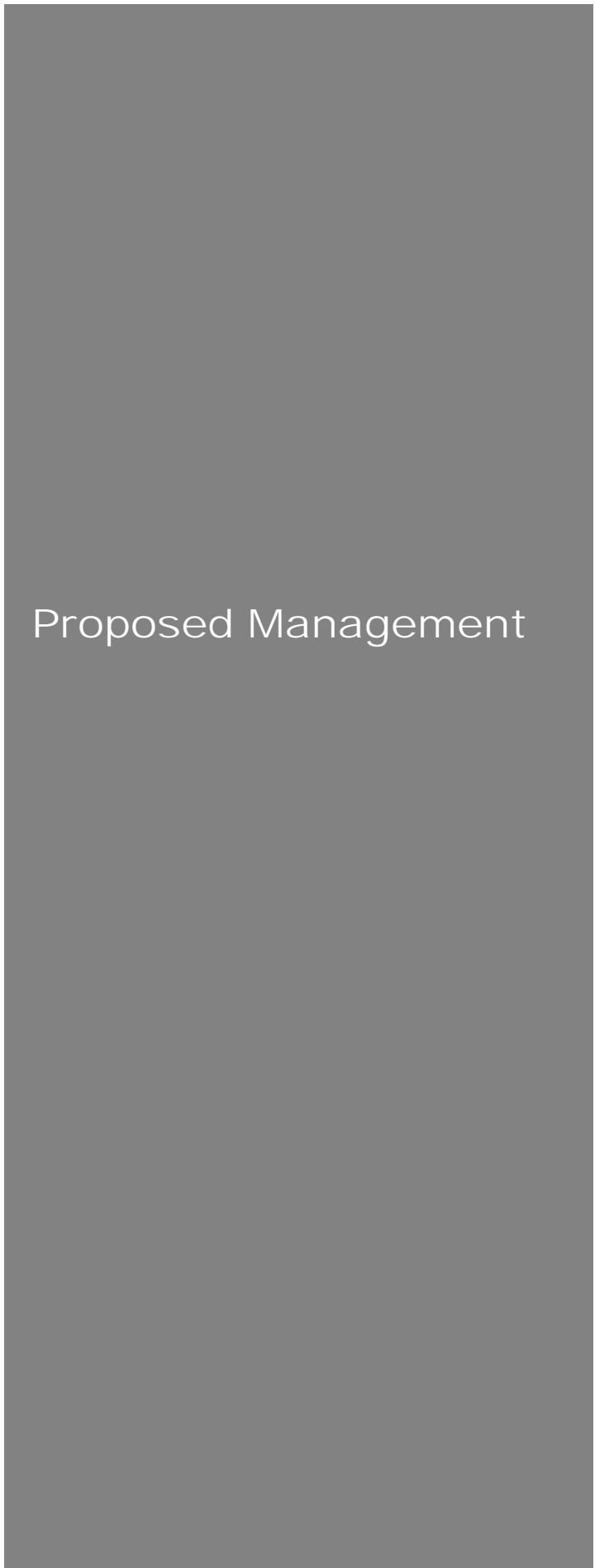


Section 4.5

Proposed Management



1080 and products containing 1080 have been used in New Zealand for about 40 years. Over this time, a comprehensive and rigorous set of controls and codes of practice has been developed by the users of 1080 and regulatory authorities. The hierarchy of controls is described below:

Regulated controls under the HSNO Act

The controls that are currently in place under the HSNO Act are described in Section 3.4 of the Application (Default Controls). These controls are derived from the hazard classification of the substances, and cover packaging, transport, use (including application rates and approved handler requirements), disposal, emergency management, tracking (of records) and identification (labeling). Additional controls that are substance-specific for 1080 and 1080 formulations were imposed in Schedule 3 of the Hazardous Substances (Sodium Fluoroacetate) Transfer Notice 2005 (see Section 3.4 of the Application). These additional controls relate particularly to licensing of users, permissions required to apply 1080, and restrictions and controls on aerial application. This regulatory framework reflects established experience in risk management and best practice built up over four decades of using 1080 in New Zealand.

Regulated controls under the ACVM Act

Under the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997, the ACVM Group of the New Zealand Food Safety Authority imposes controls on the use of 1080 products. These controls primarily relate to trade name registration, labelling and signage requirements of all vertebrate toxic agents, including 1080. These are described briefly in Section 3.4 of the Application.

Local authority controls

Local authorities (primarily regional or unitary councils) may impose controls on 1080 application under the Resource Management Act 1991, although these vary throughout the country.

Organisation-specific controls/codes of practice

All handlers and users of 1080 (transport operators, manufacturers and users, such as DOC, regional council staff and pest control contractors) have their own internal, organisation-specific operating procedures. These give effect to the HSNO and ACVM regulations and additional regulatory requirements such as those of the Health and Safety in Employment Act 1992 and Resource Management Act 1991, as well as local or organisation-specific operating requirements, including best practice procedures.

Recommendation

The risk assessment presented in Section 4.1 of the Application is based on the controlled risks, that is, the assessment assumes that 1080 continues to be used in accordance with current practice, controls and regulations as summarized above. The risk assessment has identified no significant risks arising from the use of 1080. As current procedures are managing the risks adequately, no further controls are recommended by the applicants.