



## **PERMIT TO ALLOW MINOR USE AND SUPPLY OF AN AGVET CHEMICAL**

### **FOR CONTROL OF THE BLACK RAT (*Rattus rattus*) AND HOUSE MOUSE (*Mus musculus*) ON LORD HOWE ISLAND**

#### **PERMIT NUMBER – PER85459**

1. This permit is issued to the Lord Howe Island Board (**the permit holder**) under section 112(2) of the Agricultural and Veterinary Chemicals Code (**Agvet Code**). It authorises certain things to be done in relation to PestOff Rodent Bait 20R (**the product**), an unregistered product containing 0.02 g/kg brodifacoum as the only active constituent. The product is proposed to be used in the implementation of a program known as the ‘Lord Howe Island Rodent Eradication Project’.
2. For the purposes of this Permit,
  - 2.1. “Lord Howe Island” means:
    - the island known as Lord Howe Island
    - all adjacent islands which are within 2000 metres of Lord Howe Island measured from low-water mark on the coast of Lord Howe Island
    - all other adjacent islands from which Lord Howe Island can be reached by crossing less than 2000 metres of water in any single journey, eg by way of ‘island hopping’.
  - 2.2. the “settlement area” is the area on Lord Howe Island other than the Permanent Park Preserve, uninhabited Crown Reserve and Special Leases.

#### **DURATION OF THE PERMIT**

3. This Permit is in force from 24 August 2018 until the end of 31 August 2020.

#### **MAKING OF CLAIMS IN RESPECT OF THE PRODUCT**

4. Any person may make a claim that the product may be used in accordance with this permit.

#### **POSSESSION WITH INTENT TO SUPPLY AND SUPPLY**

5. Animal Control Products Ltd, of 408 Heads Road, Wanganui, New Zealand (**the supplier**) may:
  - 5.1. Possess and have in their custody the product for the purposes of supply; and

- 5.2. supply the product,  
to persons authorised to use the product by this permit.

## USE OF THE PRODUCT

6. Employees, contractors, or persons under the direction of, the permit holder, may:
- 6.1. Possess and use the product;
  - 6.2. distribute and apply the product by hand in accordance with this permit, but only if they have been appropriately trained in the use of pesticides as required by the *Pesticides Regulations 2017* (NSW);
  - 6.3. apply the product aerially, but only if they hold a current NSW EPA licence to apply pesticides by aircraft.

## CONDITIONS OF USE

7. The product must be used within 12 months of the date of manufacture.

### Directions for Use

8.

| <i>Situation</i>        | <i>Target Species</i>   | <i>Product Application Method, Rate and Frequency</i>   |
|-------------------------|---|---|
| <b>Lord Howe Island</b> | <b>Black Rat</b><br>( <i>Rattus rattus</i> ) and<br><b>House mouse</b><br>( <i>Mus musculus</i> ) | <p><b>Aerial (helicopter) broadcast</b><br/>12 kg product/ha on initial broadcast, to be followed by a second application of 8 kg product/ha, approximately 7-21 days after, weather permitting, for a total 20 kg product/ha.</p> <p>Aerial broadcast is to be undertaken only in the locations specified at [9] below</p> <p><b>Hand broadcast and outside bait stations around settlement area and baiting within dwellings:</b><br/>Product to be dispersed by hand and/or placed into bait stations in accordance with [17]-[21] below. The first hand broadcast is to be undertaken at a rate of 12 kg product/ha, and the second hand broadcast at a rate of 8 kg product/ha. The second hand broadcast must not be undertaken for a minimum period of 7 days following the first distribution.<br/>Bait stations are to be placed on a 10m x 10m grid.</p> <p><b>Within dwellings:</b> product to be dispersed in accordance with [17] and [22]-[24] below.</p> |

## CRITICAL USE CONDITIONS

### Aerial (helicopter) Broadcast

9. Product may only be distributed aerially (via helicopter) in the following areas:
  - 9.1. the Permanent Park Preserve
  - 9.2. uninhabited Crown Reserve bordering the Permanent Park Reserve
  - 9.3. on Special Leases bordering the Permanent Park Reserve where livestock have been removed.
10. No aerial broadcast over tidal beach areas of North Bay, Ned's Beach, Old Settlement Beach, Blinky's Beach and Lagoon Beach as far south as, and including, Kings Beach.
11. Product to be distributed via an underslung hopper bucket, with mechanical spinner attached to distribute the product horizontally from the helicopter. A trickle chute may also be attached to the bucket to allow the product to be dropped in a narrow swath below the helicopter.
12. Product distribution should only occur in fine weather and preferably where wind speed does not exceed 15 knots. Weather must be monitored in the lead-up to and during baiting and a record of conditions maintained.
13. A maximum of two (2) applications to be undertaken, in accordance with the Directions for Use (above).
14. User must comply with the NSW EPA Pesticide Order AIR-1. Even where an occupier grants permission to distribute within 150 m of their dwelling, the product may not be distributed via helicopter within 30 m of a building.
15. The loading area must be established in the Special Event Zone established on 1 February 2019 under the *Aviation Transport Security Act 2004*. Employees working at the airport and persons occupying the dwellings within 200 metres from the helicopter loading site must be notified that dust may be produced at the time of loading the hoppers of the helicopter near the airport, which, if inhaled, may be injurious to health. Owners of nearby residences may consider placing tarpaulins over their roofs during loading operations. The Board must supply a tarpaulin on request to any persons occupying dwellings within 200 metres of the helicopter loading zone.
16. Overflight of dwellings, and departure from preferred flight paths (as shown on the 2 maps entitled *Preferred flight/approach paths around the mainland settlement area* (Annex 1 of this Permit), is prohibited, except insofar as either is necessary to avoid a serious and imminent risk to air safety.

## **Hand Broadcast and Bait Stations in and around settlement area**

### ***Property Management Plans***

17. Where a Property Management Plan is in place, distribution of the product for that property is to be consistent with that plan. Where no Property Management Plan for a dwelling is in place only bait stations on a 10m x 10m grid will be used.

### ***Outdoor areas of the settlement area***

18. Product may only be distributed by hand broadcast in the following areas:
  - 18.1. Uninhabited Crown Reserve (excluding public spaces such as the mown BBQ areas, Playground and Lagoon foreshore from Old Settlement Beach south to the Seawall)
  - 18.2. On Special Leases where livestock have been removed
  - 18.3. On other Leases with leaseholder permission.
19. In areas where bait stations are to be used outside, the product may only be distributed via Globe Pest Solutions Rodent Bait Stations.
20. Bait stations must be adequately covered when used in the open air to prevent access to bait by birds.
21. Bait stations must be locked and secured to the ground when installed, unless prevented by impervious ground conditions.

### **Within dwellings**

22. Product to be placed into either:
  - 22.1. Bell Laboratories Protecta Evo Mouse Bait Stations, or
  - 22.2. with the consent of adult occupants, into trays that are located in areas out of the reach of children and domestic pets (eg roof cavities).
23. Where there is no agreed Property Management Plan, only Bell Laboratories Protect Evo Mouse Bait Stations will be used.
24. Bait stations must be locked and secured in place unless they are located in areas out of the reach of children and domestic pets.
25. Care should be taken to prevent domestic pets eating the product or carcasses of poisoned rats or mice.

### **Grazing Withholding Period**

26. DO NOT graze or cut in treated areas (except where the product has been applied by bait station) for stockfood for 4 months after treatment and until the permit holder confirms, on the basis of residue monitoring, there are no detectable residues of brodifacoum in treated pasture and soil.

## **Jurisdiction and Location**

27. NSW only; specifically Lord Howe Island (as defined at paragraph 2 of this permit).

## **ADDITIONAL CONDITIONS**

28. The permit holder shall take all possible steps to ensure that the following conditions are complied with:

### **Container**

29. The supplier must supply the product in a container that must:
  - 29.1. be impervious to, and incapable of chemical reaction with, its contents when under conditions of temperature and pressure that are likely to be encountered in normal service; and
  - 29.2. have sufficient strength and impermeability to prevent leakage of its contents during handling, transport and storage under normal handling conditions; and
  - 29.3. if it is intended to be opened more than once, be able to be securely and readily closed and reclosed; and
  - 29.4. have sufficient excess capacity to prevent it from breaking if its contents expand during handling, transport or storage; and
  - 29.5. enable all or any part of its contents to be removed or discharged in such a way that, with the exercise of no more than reasonable care, the contents cannot:
    - 29.5.1. harm any person; or
    - 29.5.2. have an unintended effect that is harmful to the environment.
30. Attached to this container must be a label which is identical in content to the label in **Attachment 1**.
31. Persons who wish to prepare for use and/or use the product for the purposes specified in this permit must read, or have read to them, the details and conditions of this permit. Unless otherwise stated in this permit, the use of the product must be in accordance with instructions on its label as contained in **Attachment 1**.
32. The permit holder shall take all possible steps to ensure that the following conditions are complied with:

### ***Livestock and Poultry***

33. DO NOT allow livestock and poultry to come into contact with the product.
34. The permit holder must ensure that:
35. Livestock is penned in containment areas to prevent consumption of the product.
36. A 5 m buffer zone to the areas treated by broadcast is established around containment areas for the herd. Bait stations only may be used in this buffer zone.
37. Bait stations must be used around and within pens for the remaining herd containment area. These bait stations must be covered to prevent interference by livestock. Bait station covers secured at ground-level must be applied to any bait stations used around the herd.
38. Bait stations should be placed in areas that avoid damage by livestock and monitored for leakage of the product.
39. Livestock and poultry must not be reintroduced to treated areas (except where the product has been applied by bait station) for 4 months following treatment and until the permit holder confirms, on the basis of residue monitoring, there are no detectable residues of brodifacoum in treated pasture and soil.
40. Residents and tourists must be advised not eat any meat or offal from any animals on LHI during the baiting operation.
41. Milk from the dairy herd to be disposed of until bait is no longer present and laboratory testing confirms that there are no brodifacoum residues present.

### ***Food Producing Crops***

42. Use around or within food producing crops must only be undertaken using tamper proof bait stations.

### **EXPOSURE AND RISK MANAGEMENT; RESIDENTS AND VISITORS/TOURISTS**

43. An education programme must be implemented before baiting commences to inform residents including children through school(s) of the operation, risks, avoiding contact with the product and the appropriate actions in the event that the product is accidentally consumed.
44. A detailed information sheet outlining the hazards associated with brodifacoum must be prepared and distributed to all residents before baiting commences, and on arrival to all tourists visiting and camping on the islands before and during the baiting period and during 2019. This information sheet must include the following information: “for the protection of your own children, especially toddlers, and for the protection of any children who may visit during 2019, be advised that the ingestion of pellets whether broadcast in loose form or from bait stations may be seriously dangerous to their health. Small children should be supervised at all times to avoid that risk.”

45. LHI residents to be kept informed regularly of the progress of the operation involving the use of the product.
46. The permit holder shall ensure that as far as is reasonably possible, all dwellings have an individual Property Management Plan that include baiting instructions, product placement locations, carcass disposal instructions and safety information for property residents and pets.
47. Residents and tourists must be advised to not consume the liver of any fish caught in the shore area of Lord Howe Island until the permit holder confirms, on the basis of residue monitoring, there are no detectable residues of brodifacoum in the fish population.
48. Prior to baiting commencement residents and tourists must be advised not to drink from streams until the permit holder confirms, on the basis of residue monitoring, there are no detectable residues of brodifacoum present in streams.
49. An adequate supply of the antidote (Vitamin K1) will be held on the island for the duration of the operation in the event of incidental brodifacoum poisoning of people or domestic pets. Diagnostic and treatment procedures must be developed with the resident medical doctor and staff at LHI hospital.
50. Permanent Park Preserve areas, where aerial baiting will be undertaken, to be closed to the public, whether locals or tourists, during the days helicopter baiting is undertaken and until the Board is reasonably satisfied that pellets are no longer present on the walking tracks in the Permanent Park Preserve.
51. Hand-broadcasting of the product along the lagoon shoreline will be undertaken (where possible), with a buffer zone immediately below the high tide line (i.e) the tidal beach area (between the low and high tide line) is not to be baited.
52. Bait stations around creeks within the settlement area must be placed in such a way that bait pellets are not flushed into the water should a high-intensity rainfall occur.

#### **RISK MITIGATION PLAN**

53. All aspects of the Lord Howe Island Rodent Eradication Project Risk Mitigation Plan Version 4.0 must be followed.
54. Within 30 days after the commencement of the action, the APMVA must be informed of the actual date of commencement of the baiting operation.
55. All conditions attached to licence issued by the NSW Office of Environment and Heritage must be satisfied (C0002763).
56. All conditions attached to the approval by the Australian Department of the Environment and Energy must be satisfied (EPBC 2016/7703).

## NOTIFICATION, RECORD KEEPING AND OTHER CONDITIONS

57. The permit holder must ensure that records are made and maintained for all use undertaken with the product. The details of the record must at a minimum meet the same requirements as required by the *NSW Pesticides Act 1999* and the *NSW Pesticides Regulation 2009*.
58. The records must be progressively maintained whilst the permit is in force and for a minimum period of two years from the date of expiry of this permit and must be made available to the APVMA upon request.
59. Upon a request being made, the records are to be provided: (i) immediately if the request is verbally from an APVMA *Inspector* who has attended the premises, and (ii) in the time specified in the written correspondence containing the request.

## ADDITIONAL SAFETY DIRECTIONS AND FIRST AID INSTRUCTIONS

60. These Safety Directions are to be provided to all persons using, handling or storing the product and are in addition to the Precautions specified on the product label (**Attachment 1**) and must be followed during the handling, loading and distribution of the product:
  - 60.1 If poisoning occurs, contact a doctor, the hospital or Poisons Information Centre, phone 131126.
  - 60.2 Vitamin K1 is an antidote to brodifacoum poisoning.
  - 60.3 Poisonous if swallowed.
  - 60.4 Repeated minor exposure may have a cumulative poisoning effect.
  - 60.5 Avoid inhaling dust.
  - 60.6 Avoid skin contact.
  - 60.7 When decanting and loading for aerial application wear cotton overalls buttoned to neck and wrist (or equivalent clothing), goggles, rubber gloves and a disposable dust face mask, covering mouth and nose.
  - 60.8 If applying product by broadcast, wear cotton overalls over normal clothing, buttoned to neck and wrist and rubber gloves.
  - 60.9 When decanting and loading bait trays or bait stations wear rubber gloves.
  - 60.10 After each baiting, wash thoroughly with soap and water.
  - 60.11 Wash hands after use.
  - 60.12 When handling carcasses or product waste, wear latex or rubber gloves.
  - 60.13 DO NOT eat, drink or smoke when using the product, handling open containers, or handling rat and mouse carcasses.
  - 60.14 Wash protective clothing, including goggles and gloves after use.

- 60.15 Remove the outer layer of clothing and wash hands and exposed skin thoroughly before meals and after any contact with the product or carcasses.
- 60.16 Store bait in original container, tightly closed and away from feed or foodstuffs.
- 60.17 KEEP OUT of reach of children, pets and livestock.
- 60.18 Additional safety information for Pestoff Rodent Bait 20R is listed on the safety data sheet, which is available from [www.pestoff.co.nz](http://www.pestoff.co.nz).

#### **Re-entry or Re-handling Statement**

- 61. Do not re-handle the product, product waste or rodent carcasses, unless wearing gloves. Where possible, rodent carcasses should be collected and sealed in plastic bags at the end of each baiting program.

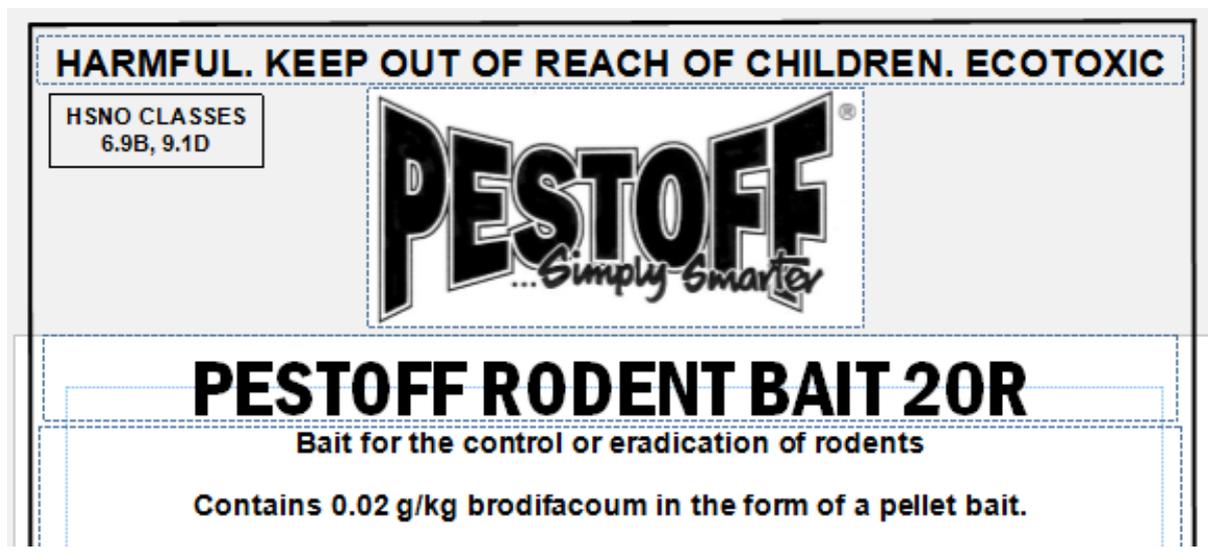
#### **Disposal - Carcasses**

- 62. Collect poisoned animal carcasses where practicable for burning or burying at least 600 mm below ground. Carcass disposal must comply with NSW EPA requirements.

Note: Version 2 issued 9/05/2019..

## ATTACHMENT 1

This product is not registered. Approved for use under APVMA Permit No. 85459



### PRECAUTIONS

**Harmful substance.** Repeated oral exposure may cause toxin to accumulate in internal organs and may affect the clotting ability of the blood. Wear gloves when handling open containers or baits. Do not breathe dust.

**Toxic to terrestrial vertebrates.** Take measures to prevent domestic animals and pets being exposed to the toxin either through eating baits or through eating the carcasses of poisoned animals.

**Storage:** Store in original container, tightly closed and away from feed or foodstuffs. Keep out of reach of children and domestic animals. Do not store in direct or diffused sunlight. Avoid cyclic heating and cooling which may cause condensation to form on the inner bag wall and cause accelerated bait degradation.

**Handling:** Wear overalls and rubber or PVC gloves when laying pellets. When handling this product in open bags particularly around aircraft, avoid inhalation of bait dust by wearing an appropriate dust mask. Avoid contact by mouth and do not smoke, drink or eat while using. Wash hands and exposed skin areas before meals, smoking and after any contact. Prevent access to baits by children, pets and domestic animals. Avoid pollution of any water supply with chemical or used container. Any dead rodents found should be buried.

**Residue Warning:** Brodifacoum, the active ingredient is a potent second generation anticoagulant poison which can accumulate particularly in the liver, kidneys and fat of poisoned animals. Do not feed rodents killed with brodifacoum baits to dogs or cats.

### EMERGENCY MANAGEMENT

**First Aid:** Brodifacoum is an anti-coagulant toxin. In the event of this product being swallowed, seek medical advice. Do not induce vomiting. The symptoms of anti-coagulant poisoning may take several days to appear. Symptoms may include pale gums, passing of blood in urine or faeces, and the appearance of bruising. Always seek medical advice in the event of suspected human poisoning.

**Treatment of domestic animals accidentally poisoned:** Vitamin K<sub>1</sub> is an effective antidote against accidental poisoning of domestic animals by Pestoff Rodent Bait 20R.

Veterinarians are familiar with the information on Vitamin K<sub>1</sub> therapy and should be consulted.

**Spillage:** In the event of a spill, isolate the spill area and take all practicable steps to manage any harmful effects of a spillage including preventing baits from entering streams or waterways. Scoop spilled baits into secure containers. Recover any undamaged bait for later use by placing in appropriately labelled containers and dispose of spoiled bait as directed below. Use a broom to collect fine material and wash down the spill area with copious water only after all spilled bait has been removed.

**Disposal:** Product which is surplus or spoiled should be disposed of by burying with other organic material on the active tip face of an appropriately managed landfill or buried within the biologically active layer of soil elsewhere within a secure area. Ensure that a good covering of earth is applied over the bait immediately to prevent access by scavenging birds. Alternatively, burn unwanted bait material in a suitably constructed and appropriately located incinerator and bury any residues as above. Treating the baits through a sewage oxidation facility or other chemical treatment facility is also an acceptable means of disposing of unwanted bait material. Dispose of empty containers by burning if conditions, especially wind direction permit, otherwise bury in an approved landfill. Do not use empty container for any other purpose.

### **DIRECTIONS FOR USE**

To achieve eradication, it is very important to apply baits across the entire treatment area and to manage successfully all possible sources of re-invasion. Apply baits in bait stations, by hand broadcasting or by aerial sowing. Two bait applications, each of approximately 8 kg - 15 kg per hectare, will usually be sufficient to achieve eradication but higher application rates and/or further applications may be required depending on the species and density of animals targeted, the presence of non-target bait consumers and the nature of the terrain. The second bait application is typically 10 or more days after the first, but may be sooner if a period of prolonged bait availability is sought or where weather or other factors limit the baiting period. Pre-feeding is not required when using Pestoff Rodent Bait 20R.

### **LEGAL OBLIGATIONS**

**Sale:** This product may be supplied only to authorised persons operating in accordance with the relevant permits.

**Limitations on Use:** Aerial and Hand Broadcast Application or use in bait stations of Pestoff Rodent Bait 20R for the Intended Eradication of Rodents from Specified Areas of Australia has been approved for this product. Persons authorised for the use of this product must do so in accordance with the relevant permits. Any person who, when using this product, knowingly fails to follow the above conditions, commits an offence and may be liable to prosecution.

**Signage:** If baits are applied in areas to which the public has right of access, it is a legal requirement that signs must be posted to notify the public that this product has been applied in the area. Signs must state that brodifacoum has been used, that feral animals may contain residues and that they should not be taken for food. Signs must remain for a period of 12 months after the last application of bait. This product must only be used as specified in the label

### **GENERAL INFORMATION**

**Shelf life:** The shelf life of this product may vary according to the suitability of storage conditions. As a guide, it is recommended that the product be used within 3 months of

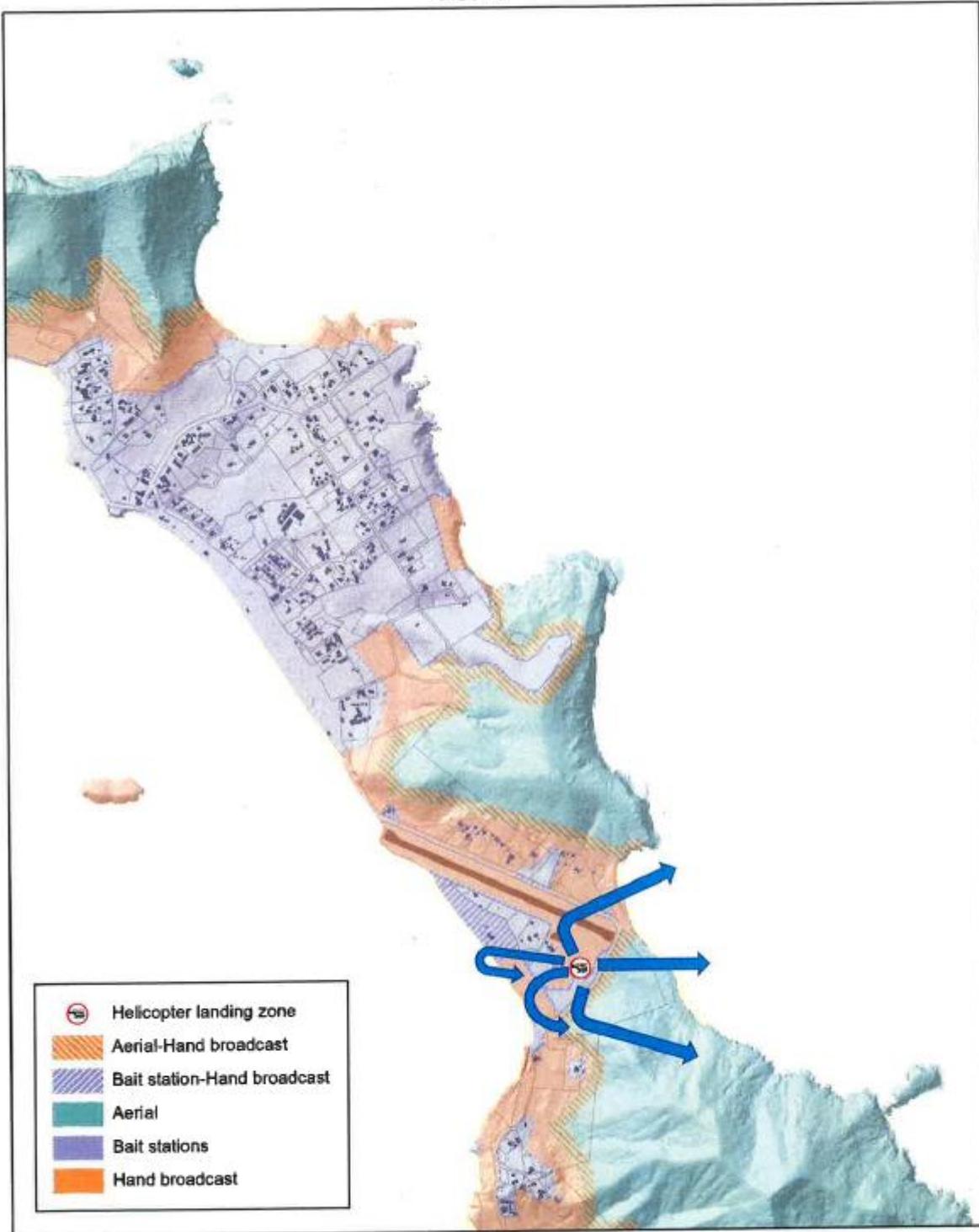
date of manufacture as studies have shown that the palatability of bait may progressively decline after that time. Any product held after the expiry date shown on the bag should be disposed of according to label directions.

**Livestock:** It is important to prevent access to baits by domestic livestock and pets. Stock must be kept off the treatment area until baits have been washed out by rain, removed or destroyed. Dogs and cats are at risk from scavenging poisoned animal carcasses and pet owners in the immediate vicinity should be notified of this risk. Collect poisoned animal carcasses where practicable for burning or burying at least 600 mm below ground, otherwise limit access to the treatment area until poisoned animal carcasses are unlikely to be eaten or to contain residues.

**Conditions of sale:** As no control can be exercised over the methods or conditions under which this product is used, no responsibility or claim, other than those required by statute, will be accepted for any damage or injury whatsoever arising from the storage, handling, application, use or disposal of this product.

**Transport information:** This product does not trigger a Dangerous Goods Classification and may be transported by road, rail, sea or air without the need for placarding or Dangerous Goods documentation.

|  |   |   |                                   |
|--|---|---|-----------------------------------|
| <b>Registered to and Manufactured by:</b><br><b>Animal Control Products Limited - Trading as ORILLION</b><br>408 Heads Road, Whanganui 4501, New Zealand. Ph 64 (0)6 344 5302<br>For safety data sheet go to <a href="http://www.pestoff.co.nz">http://www.pestoff.co.nz</a> |   |   | <small>WU 8 : 8 EPT 20 17</small> |
| Registered pursuant to the ACVMA Act 1997, No. V009014   |   |   |                                   |
| Pack No.:<br>SO No. & Manuf. date:<br>Size:<br>Expiry Date:<br>Batch No.:  | <b>NET CONTENTS</b><br><b>25 kg</b><br><br>EPA APPROVAL CODE<br>HSR00 16 12 |  |                                   |



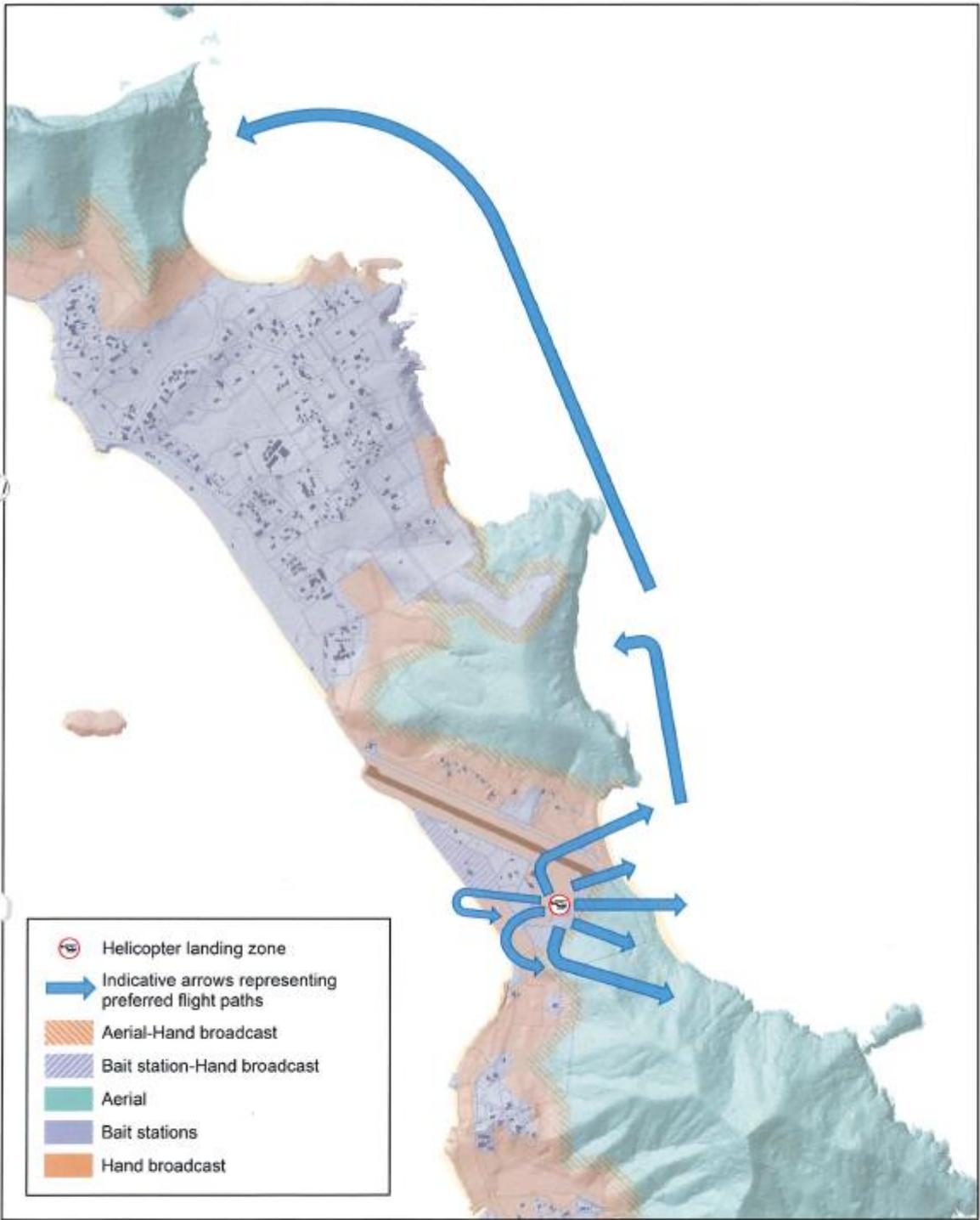
Scale at A4 = 1:20,000  
 MGA 94 - Zone 67  
 Map produced: 6/04/2019  
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**Preferred flight/approach paths  
 around the mainland settlement area**  
 Lord Howe Island Rodent Eradication Program

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Scale at A4 = 1:20,000  
 MGA 94 - Zone 57  
 Map produced: 16/04/2019



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### Preferred flight/approach paths around the mainland settlement area Lord Howe Island Rodent Eradication Program

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