

RAMPSUK

The Register of Accredited Metallic
Phosphide Standards in the United Kingdom

THE RAMPS UK CODE OF GOOD PRACTICE



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VERSION 2

CONTENTS

THE RAMPS CODE FOR STOCKISTS	3
THE RAMPS CODE FOR USERS	4
THE RAMPS CODE FOR TRAINERS	5
APPENDIX 1 – CORRECT STORAGE OF ALUMINIUM PHOSPHIDE.....	6
APPENDIX 2 – DISPOSAL OF USED PACKAGING.....	7
APPENDIX 3 – GAS LEVEL MONITORING.....	8
APPENDIX 4 – POST TREATMENT CLEANING OF APPLICATORS.....	10
APPENDIX 5 – DRAFT APPLICATION LETTER TO PURCHASE ALUMINIUM PHOSPHIDE....	11

BASIS RAMPS LIMITED is a company limited by guarantee which has been formed to administer RAMPS UK, the independent scheme set up by the British fumigation industry to establish standards of good practice for sellers, suppliers and users of metal phosphide products and those who provide training in their sale and use.

RAMPS is run from the offices of BASIS (Registration) Limited in Ashbourne, Derbyshire. BASIS provide the secretarial services needed by the company.

The RAMPS members include representatives from metal phosphide product approval holders, relevant trade associations and industry bodies, sellers and users.

Its remit is to liaise with Government departments and agencies, as well as to draw up codes of good practice and to provide advice and assistance to sellers and users of the products as appropriate.

THE RAMPS CODE FOR STOCKISTS

All responsible stockists should hold a current store keepers certificate and undergo an annual assessment by BASIS (Registration) Ltd to confirm that the storage and Poisons Rules requirements are being met.

Contact BASIS www.basis-reg.com for information and advice on the pesticide store assessment scheme.

ALWAYS

- Check that the customer is known to you. If not, confirm the identity and qualifications of the person making the purchase
- Complete the poisons register during each purchase recording the name, occupation, address and qualification of the purchaser, the date of the purchase, the quantity and type of product purchased, what pest they are going to control and the flask identification number. This should always include the signature of the purchaser.
- Internet or telephone sales. Insist on a signed order from the customer which must state the purpose for which the product is to be used and the words "This is a Poisons Signed Order". This order must be received before or at the time that the goods are released by the delivery driver
- Only sell to companies or individuals who can demonstrate that the user of the product holds one of the certificates specified by the competent authority
- Store the product in a locked cabinet, fixed and above the bunding in a dry and secure area away from offices and buildings occupied by man or animals
- Have an annual BASIS store inspection
- Mark the storage area with the correct signage – skull and cross bones in yellow triangle and the words "Gassing compound" and a prohibition sign showing bucket and flame symbol and the words "Do not use water"
- Ensure the customer is familiar with the product and holds a current recognised certificate of training
- Question further if the order is for products in unusual quantities or concentrations or if there is another reason for concern
- Question further if the customer wants to pay in cash
- Do not supply if you have concerns about the customer's suitability to buy or their intended use for the product

NEVER

- Have the product on open display
- Make a sale to companies or individuals who are not known to the stockist and can't prove identity and show an approved certificate of training or assessment
- Sell on to any other stockist who doesn't hold a current BASIS audit certificate or can provide evidence that they conform to the requirements of a BASIS annual audit
- Sell to anyone who cannot prove they are a professional user who needs the product for use in their business, trade or profession.



Please note:

Products used for plant protection purposes, which includes the control of rabbits and moles as well as food storage practices, are authorised under Regulation (EC) 1107/2009. Under current UK regulations any person who makes a plant protection product available on the market, whether as a wholesaler, retailer, vendor or supplier, must hold a certificate recognised by the Competent Authority, or must work under the direct supervision of someone who does.

For fumigants for invertebrate control, the relevant certificate is the BASIS certificate in Stored Combinable Crops.

For rats, rabbits and moles the relevant certificate is the BASIS Certificate in Crop Protection (Aluminium Phosphide for Vertebrate Control).

THE RAMPS CODE FOR USERS

All users must hold a recognised and current certificate in the safe use of metallic phosphides.

ALWAYS

- Always read the label before use and follow the instructions fully
- Assess the risk to yourself, others, non-target animals and the environment prior to commencing work and adopt the necessary operational & engineering controls appropriate for the work or substitute the control measure for a physical or less toxic method (COSHH/risk assessment)
- Identify the Fumigation area and the Risk area (Please refer to Appendix 4). Monitor phosphine gas levels on the perimeter of the Risk area and extend it if readings are greater than 0.01 ppm.
- Keep records of phosphine gas readings
- Buy the product from an authorised stockist, show your proof of identity and qualification
- Complete the poisons register
- Store the product in a locked container, fixed and above the bunding and in a dry and secure area away from offices and buildings occupied by man or animals
- Mark the storage area with the correct signage – skull and cross bones in yellow triangle and the words “Gassing compound” and prohibition sign showing bucket and flame symbol and the words “Do not use water”
- Transport the product in an appropriate, secure gas tight container in the load area separate to the driver and passengers
- Use an appropriate applicator when placing tablets in runs and burrows
- Use appropriate Respiratory Protective Equipment and other appropriate PPE when loading and venting the applicator and at all times when using/applying the product
- Use the entire flask contents on site
- Vent empty flasks and applicators thoroughly in a safe location and dispose of empty flasks as hazardous waste
- Keep stock records i.e. delivery of stock into the store and details concerning when and where stock has been used
- Always write a treatment report including contact numbers
- Use metallic phosphide products safely
- Ensure that secure arrangements are in place to receive product at the nominated delivery address

NEVER

- Purchase the product from a non-approved stockist
- Sell the product on to anyone else regardless of proof of qualification
- Store the product in an area accessible to other people or below the level of the bund
- Reseal and store a part used flask
- Use the product in wet weather or heavy mist/fog
- Treat any species other than rats, rabbits or moles where label approval permits
- Treat a burrow if you are not 100% certain of the species that is occupying it (Environmental assessment)
- Treat a run or burrow within 10 metres of a surface water course or non-target burrow.
- Treat a run or burrow within 10 metres of an occupied building or if the occupied building falls within the Risk area.
- Transport empty flasks and used applicators in vehicles in such a manner that fumes may enter and affect drivers and passengers
- Wash out applicators after use unless (a risk assessment indicates) it is safe to do so (please refer to Appendix 3)
- Dispose of empty flasks without venting
- Allow unqualified members of staff or the public to have access to the product
- Allow untrained members of staff to use the product
- Never apply more product than is recommended on the label
- Never treat the same area of agricultural land more than four times in one twelve month period
- Never treat a field within seven days of being planted
- Never grant access or remove any restrictions to entry to the Fumigation or Risk areas until phosphine gas readings are below 0.01 ppm



THE RAMPS CODE FOR TRAINERS

All responsible trainers must be able to deliver a training course that covers all aspects of the safe use of aluminium phosphide for vertebrate control and prepare candidates to be assessed for an accredited qualification in the Safe Use of Aluminium Phosphide for Vertebrate Pest Control.

ALWAYS

- Cover the syllabus set for the assessment
- Complete and work to a lesson plan
- Display and demonstrate PPE and application equipment
- Make candidates aware of the risks associated with the product and recommend additional training in first aid, risk assessment and COSHH assessments
- Where the training organisation is separate to the assessment centre, know the details of the closest assessor or assessment centre and recommend candidates are assessed as soon after the course as possible.
- Keep up to date with the latest changes to the syllabus, legislation, labels and conditions of use and sale and incorporate them into the training delivery and material

NEVER

- Assume that candidates who have worked with the product in the past have been using it properly
- Use live product as part of any demonstration or display
- Discourage people from being assessed after the course unless it is felt by the trainer that they are unsuited or not yet ready to use the product



Please note:

Anyone who uses a plant protection product authorised for professional use must hold an accredited certificate. Also, anyone who purchases such a product can legally only do so if the intended end-user (whether it is themselves or someone else) has an accredited certificate.

Accredited certificates are those recognised and listed by the Chemicals Regulation Directorate of the Health and Safety Executive, in accordance with Regulation 5 (11) of the Plant Protection Products (Sustainable Use) Regulations 2012.

The list of accredited certificates (which is updated as necessary) can be found on www.ramps-uk.org/training/

Users must also now hold a certificate recognised by HSE for biocidal uses for products Authorised under REGULATION (EU) No 528/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL.



APPENDIX 1

Correct storage of aluminium phosphide

1. Storage needs

- Ensure that the store is large enough to hold the peak pesticide requirements
- Provide adequate storage for empty containers awaiting disposal.

2. Store location

- Site the store away from areas that present a risk of fire
- Do not store near to drains, watercourses, wells and boreholes or areas liable to flooding
- Make sure that cabinet stores are not located in domestic dwellings, retail areas, staff rooms, offices, animal houses or areas where human or animal food is stored or processed
- Make sure that access to the aluminium phosphide store within a larger building is not through such areas as named in the previous bullet-point
- Make sure that all staff know what to do in the event of a chemical spillage or fire
- Make sure there is ready access for pesticide deliveries and/or the emergency services.

3. Construction

- Provide a store that is resistant to fire, capable of retaining leakage/spillage, dry, frost-free, adequately ventilated and secure against unauthorised access
- Use bunding to ensure that leakage from the store or the area in which the store is located will be contained
- Ensure that the cabinet etc. is stored above the level of the bunding away from direct sunlight and sources of heat
- The store itself or the area in which it stands should be roofed
- Remove combustible materials away from the store
- Seal off internal drains if present

4. Using cabinet/bin/chest stores

- Purpose-built proprietary cabinets for pesticide storage are available
- Use a metal, fire resistant cabinet
- Site away from traffic movement areas
- Stand metal cabinets within a bunded area. Ensure cabinets are fixed above the bund
- Make all cabinets, etc. secure (lockable) or locate them in a secure (locked) area.
- Ensure that cabinets etc cannot fall over e.g. by bolting or strapping to a structure.
- Ensure all cabinets have a water-shedding lid

5. Organising and marking the store

- Mark the exterior of the store (and where it is located within a larger building, the exterior of the building) with the general danger warning sign – black exclamation mark in yellow triangle
- Mark the store itself with the “Gassing Compound – Do Not Use Water” combined symbols sign

- Provide adequate shelving, lighting and frost protection
- Do not store aluminium phosphide products near water-based or acidic products.



6a. Dealing with a spillage - Indoors

- To mitigate risks from spillage, flasks should only be opened outdoors at the site of use
- Always wear the appropriate protective clothing including a respirator to deal with any spillage
- Provide dry inert absorbent granules and an impermeable container to deal with any spill or leaking package incidents.
- Prevent dispersion.
- Collect spilled material.
- Keep it dry.
- Store in a safe place.
- Keep the area ventilated
- Contact supplier for advice on disposal.
- Report incidents to the supplier.
- Ensure that the emergency incident helpline's telephone number is readily available.

6b. Dealing with a spillage - Outdoors

- Flasks should only be opened outdoors at the site of use
- Always wear the appropriate protective clothing including a respirator to deal with any spillage
- For individual tablets push the product into nearest burrow and seal
- For larger quantities it will go against label instructions to overdose a burrow, so dig a hole at least a foot deep and push the spilt tablets into the hole and fill it in
- Mark the area and cordon it off
- Inform the land owner of the spillage and action taken

7. Other needs

- Store must be locked at all times when unattended
- Ensure an adequate number of suitable PPE and dry powder fire extinguishers are available on site
- Establish an action plan in case of an incident e.g. fire, gas release
- Report theft incidents immediately

8. Further information

- Agriculture Information Sheet No. 16 – Guidance on storing pesticides for farmers and other professional users
- Agriculture Information Sheet No. 22 – Gassing of rabbits and vertebrate pests
- Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry PB 3529 DEFRA 1998 (The Yellow Code)
- Product material safety data sheet.
- RAMPS acknowledge HSE as the source for certain information in this guidance.
- Fumigation: Health & safety guidance for employers & technicians carrying out fumigation operations, Date of publication 2015, Series code: HSG251 (Second edition)

APPENDIX 2

Disposal of used packaging

Waste disposal by stockists and users

- Plan pest control activities so that the complete contents of aluminium phosphide flasks are used on site during each daily session
- Up-end the flasks and tap out any residues into the burrow system, making sure that the flasks are completely empty
- Residue, however small, should not be left exposed on the surface
- Empty flasks can be re-sealed only for transport to waste storage area (see below)
- Do not store, re-seal or transport part used flasks

Waste Treatment Methods

- All pesticides must be disposed of as hazardous waste
- Never wash out empty flasks with water
- Once pest control activity has been completed, ensure that all residues of product are removed
- Empty the flasks completely at site of use by upending and tapping the flask so that any remaining powder residue is deposited in the treatment burrow or run
- Check that the flask is visibly empty
- If residue remains, repeat upending and tapping until fully removed
- Ensure that the empty flask is kept dry
- Tap out any residues from the applicator at the site of use as for the flasks

Product/packaging disposal Disposal of waste flasks

Handle and store empty flasks as if they still contained product

- Flasks must never be rinsed or cleaned
- Screw the cap back onto the empty flask loosely (this action should only be carried out prior to transporting to designated storage area, flasks should NOT be re-capped if they still contain tablets, ensure that all product is used during the pest control treatment), this will help to ensure that any gas generated within the flask during transport from the treatment area is contained

- Place the flask into a suitable sealable bag or into a specialist gas tight container
- Label the bag and place the written confirmation that the waste treatment methods have been completed, date and sign
- Seal the bag using tie wraps.
- Once at designated storage area and prior to waste collection, whilst wearing a full-face respirator with appropriate gas filter cartridge (which meets P3 standard for particulates) or SCBA (contact your PPE supplier for advise on suitable PPE and RPE) and whilst wearing suitable gloves and skin protection such as rubber/PVC gloves and coveralls, remove the flask from the sealed bag
- Remove caps, taking care and pointing flask away from face and other people, as any generated gas may be present and could ignite spontaneously
- Invert the flasks on a mesh shelf in a secure and well ventilated caged area until all gas has vented from the flask
- We recommend venting the flasks for 48 hours
- Once venting is complete, re-cap flask and replace into and seal the plastic bag
- Record on the written confirmation that the flasks have been vented
- Store in a designated secure storage area for collection by a licensed waste-disposal contractor
- The written confirmation should include the name of the waste disposal contractor and the date they were contacted to collect the flask

Waste EWC Codes European Waste Catalogue codes:-

- Packaging containing residues or contaminated with aluminium phosphide– 15 01 10* hazardous waste. Consign using a consignment note for hazardous waste.
- Redundant stock, damaged containers, transport casualties – 20 01 19*. Pesticides.
- Consign using a consignment note for hazardous waste

APPENDIX 3

Gas level monitoring

Gas level monitoring is required for two reasons:

- To determine that the Risk area is sufficient and that the concentration of phosphine gas outside the Risk area is less than 0.01 ppm.
- To determine that the levels of phosphine gas in the **Risk area** and **Fumigation areas** are below 0.01 ppm so that clearance can be granted and exclusions can be removed i.e. both areas are safe to re-enter.

Definitions

Fumigation area:

The Fumigation area is the area in close proximity to directly treated burrows and any runs or other locations from below which phosphine gas may possibly escape. It is defined as **'the area in which treatments are underway and in which product is (or has been) actively applied into burrows. It can be of any shape or of any size depending on the extent of the burrows and its limit is the outer border of where the pest control activity is being conducted.'**

Risk Area:

The Risk area is the area of possible danger around the Fumigation area and out to a defined boundary where phosphine gas may be detected.

The Risk area must be established at least 25 metres from the edge of the Fumigation area but the area can be reduced to a minimum distance of 10 metres from the edge of the Fumigation area if it can be ensured by operational means that no person, farm animal or domestic animal will be present within this distance.

The concentration of phosphine outside of this Risk area has to be below 0.01ppm and re-entry of persons into this Risk area other than by the operator can only be permitted once clearance is granted by the operator and the concentration of phosphine is below 0.01ppm.

However under no circumstances can treatments be conducted if the intended Fumigation area is within 10 metres of surface watercourses, ditches human habitation or any non –target burrows, farm or domestic animal habitation.

Monitoring protocol:

Each site will differ in its requirements. The protocol and frequency of monitoring may vary depending on the results of the site risk assessment including such factors as site security, topography and prevailing wind.

Accurate treatment records must be kept and a site plan should be generated and also kept with these records.

Risk Area Monitoring Method.

- Make a note of the date and the treatment start time plus the location and the extent of the total Fumigation area.
- Before starting the treatment identify all of the burrows to be treated and set up and mark the outer boundaries of the whole Fumigation area and the Risk area and take the necessary steps to exclude all possible persons or animals from entering that area.
- Immediately after treatment and whilst still wearing full PPE and RPE, select and mark appropriate locations around the boundary of the Risk area to take initial phosphine readings. As a minimum three should be located upwind and downwind of the Fumigation area and at two points in-between
- Take two readings at each marked location, one at head height and one at 10 cm above the ground. Make a note of the time and the phosphine readings.
- If phosphine levels are detected at or above 0.01 ppm extend the Risk area until levels are found to be below 0.01 ppm
- Revisit the site and repeat monitoring at appropriate intervals and measure around the outer perimeter of the Risk area. If gas is detected then the outer boundary of the Risk area should be increased until the levels are found to be below 0.01 ppm. If gas is not detected the area may be reduced working from the outside of the Risk area inwards, but at no point should the Risk area be reduced to less than 10 metres from the Fumigation area.

Method for Monitoring for clearance

After 48 hours or at a period agreed with the landowner or occupier (whichever is greater) monitoring can commence to determine if clearance to the Risk and Fumigation areas can be granted.

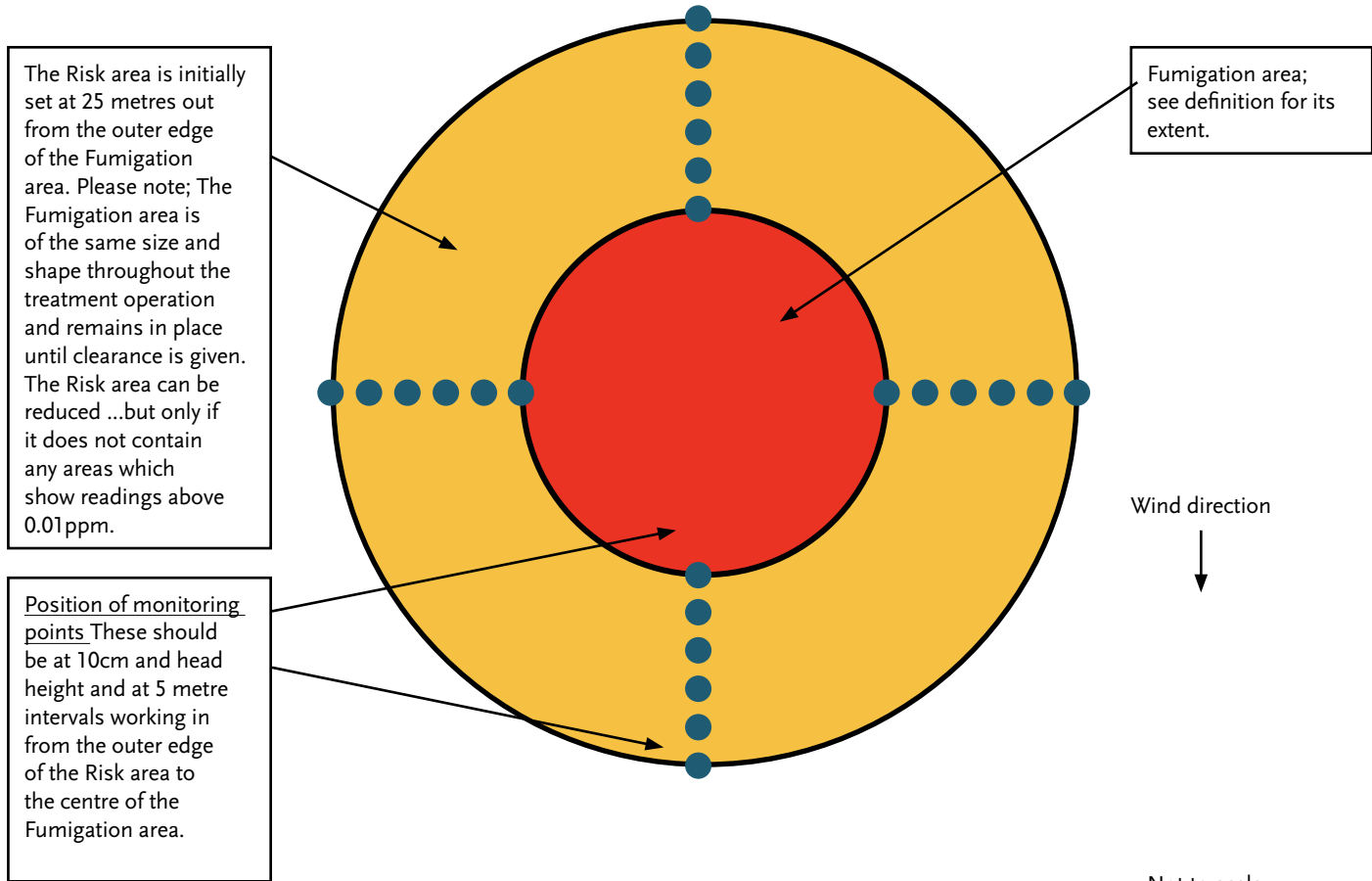
Accurate records must be kept and retained for future inspection if required.

Make a note of the date, time and location.

- Observe the wind direction, wearing full PPE and RPE go to the edge of the Risk area downwind of the Fumigation area and take two readings, one at head height and one at 10 cm above the ground. Mark the reading point and make a note of the time and the gas readings.
- Working into the wind take further readings at 5 metre intervals up to the centre of the Fumigation area. If phosphine is detected at any of these points clearance cannot be granted but the Risk area may be reduced to the last positive reading or 10 metres from the edge of the Fumigation area ..whichever is greater.
- Repeat the process until four sets of readings have been taken at opposite points from the Risk area to the centre of the Fumigation area.

Once all readings show phosphine levels below 0.01ppm barriers can be removed and the owner or occupier of the land informed that the treatment is complete and the Fumigation and Risk areas are safe to re-enter. Make a note of all readings, retain a copy and present them in the final report to the owner or occupier.

Establishment of Risk and Fumigation area monitoring locations;



APPENDIX 4

Post treatment cleaning of applicators

The washing of the applicators, if outlined in the product label, should be conducted to ensure there is no hazardous build-up of aluminium phosphide residues within the device. However, before progressing with this cleaning procedure, an appropriate risk assessment should be conducted to ensure there is sufficient time for all of the parts within the applicator to be safely dried before the next required use. This is necessary in order to ensure there is no possible contact between any trapped moisture inside the device and the product to be added as this could generate phosphine.

However, if as a result of a risk assessment immediate cleaning by washing is not possible, the following procedure should be followed:

- Ensure the applicator has no product trapped inside - wearing suitable RPE and PPE, open all possible apertures and tap any dust residues or powder out of the device into the last burrow treated and cover.
- Transport the device to a safe location for venting in a well ventilated and completely separate part of the vehicle to the driver and any passengers or in a gas tight container stored in a part of the vehicle to ensure that no possible exposure to phosphine gas can occur in the event of the container becoming damaged; preferably in a container secured to the outside of the vehicle.
- Venting should be carried out in the open in a safe and secure location, protected from rain and well away from any habitation or otherwise occupied buildings. Venting should continue until no more gas is produced and the applicator can therefore be considered to be empty.
- At the first available opportunity following this emptying procedure the applicator should be cleaned by washing as described on the product label.

APPENDIX 5

Draft application letter to purchase aluminium phosphide

Letter on headed paper

To:- Supplier

From:- name, full address & contact telephone number

Business Trade or Profession:-

Date:-

Order no./ref:-

Dear Sir,

Please supply.....flasks of (named product). This will be used for rabbit/ mole/ rat control (indicate target pest).

I enclose/you already have on file, a copy of my certificate of training in respect of using aluminium phosphide products.

This is a Poisons Signed Order.

Yours sincerely

Signature:-

Full name (print):-

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