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29 May 2015

Commissioner Weatherall & Commissioner Pullar
C/o. Howard Alchin, Senior Planner
Gore District Council
PO Box 8
Gore 9740

Mataura Resource Consent Hearing
IZ001300

Provision of Supplementary Information

Dear Commissioners,

1. Introduction

Taha Fertilizer Industries Limited (Taha) seeks land use consent from Gore District Council (Council) to store Ouvea Premix plus a small number of other hazardous substances in minor quantities in the former Mataura Paper Mill buildings. The resource consent application hearing was adjourned on 14 May 2015 pending the provision of further information as requested by the Commissioners.

On 20 May 2015, Counsel filed a Memorandum of Counsel outlining the information Taha would provide to the Commissioners and a timeframe for providing this information. The timeframe included the provision of readily available information by 29 May 2015, and the provision of all remaining information by 3 July 2015.

By the 29 May 2015, the applicant agreed to provide the following information:

(a) an assessment of flood protection measures that can be permanently installed, including a proposed timeframe for permanent installation;

(b) a definitive status of what material is currently stored on site and where it is stored, including:

  i. a marked-up site layout plan showing the quantities of material and where material is stored;

  ii. an assessment on whether other material could be permanently removed from the site (e.g. Sulphate of Ammonia and Citric Acid Crystals); and

  iii. if any movements are proposed as per (ii), an outline of steps taken to instigate this removal, traffic management, proposed consultation and a timeframe;

(c) an outline of the process for drafting Safety Data Sheets (SDS) and obtaining the Status of Substance (SoS) for Ouvea Premix, including independent tests that have been undertaken and the status of other mixes;

(d) the correct SDS for Ouvea Premix and Aluminium Dross, and the full EPA SoS decision document with appendices;

(e) the correct street address for buildings;

(f) a summary of communications with NZTA;

(g) a draft communications plan through the Community Liaison Group;

(h) a detailed timeframe for removal; and

(i) more detail on company structure and relationships between companies and key personnel.

In your Minute of 22 May 2015, you accepted the provision of information and timeframe, which was again confirmed by the applicant in the Memorandum of Counsel, dated 28 May 2015.

For completeness and ease of reference, this letter provides a package of information I have obtained from Taha representatives, Jacobs New Zealand Limited (Jacobs) and Greg Paterson to respond to the information requests, and particularly the information Taha agreed to provide by 29 May 2015.

2. Flood protection measures to be permanently installed

Appendix A contains a memorandum from Nathan Burgess, Plant Manager at Taha, providing an update on Taha's consideration of permanently installing flood protection measures.

In summary, through consultation with Mr Tony Dackers of Fire Compliance Limited, Taha has identified that, from a fire safety point of view, it will not be possible to permanently install steel panels across the "man doors" (i.e. the doors used to enter and exit the building). However, it will be possible to permanently install steel panels across the roller doors as these doors are only used for loading and unloading materials. Doing so would reduce the time required for installing flood response measures in a flood situation.

Taha is assessing which doors could be permanently blocked without affecting loading operations. The outcome of this assessment will be provided as part of the Flood Protection Plan as supplementary evidence by 3 July 2015.

3. Definitive status of material stored on site

Taha has confirmed that the following list of materials represents an accurate reflection of the material currently stored at Mataura:

- Ouvea Premix, made up of:
    - Cast-House Ouvea Premix: 7,556 tonnes
    - Landfill Ouvea Premix: 1,614 tonnes
    - Bag-house Ouvea Premix: 774 tonnes
    - MRP Bag-House Ouvea Premix 8 tonnes
- Sulphate of Ammonia: 8 tonnes

- Citric Acid: 350 kg
- Diesel: 100 litres

The list is based on TNL's trucking records of material that has been transported from the NZAS smelter to the site. As such, I understand that any variance from this list is expected to be minimal.

Appendix B contains a Site Layout Plan, which has been marked-up by Taha, indicating exactly in which buildings and where in the buildings material are stored and estimated amounts. It should be noted that the Site Layout Plan is based on a visual inspection of the site so the actual amounts are an approximate. As such, the total of amounts in the Site Layout Plan varies slightly from the definitive amount indicated in this memo.

Regarding the non-Ouvea material, Taha has undertaken an assessment of which of these materials could be removed permanently. Appendix C contains a memo from Mr Burgess detailing the outcome of this assessment.

In summary, the sulphate of ammonia is the only (non-Ouvea) material Taha considers could be removed from the site. Taha has suggested this material could be removed and transported to Taha's storage site on Liddel St, which has resource consent to store up to 200 tonnes of sulphate of ammonia. The diesel is required for forklifts and the citric acid crystals are used as a mitigation measure to reduce ammonia gas emissions in the building. As such, Taha does not consider removing these materials to be viable.

Taha has advised that the intention is also to remove the 8 tonnes of MRP Bag-House material from the site and return it to Taha Asia Pacific prior to obtaining resource consent for storage.

4. Safety Data Sheets and Status of Substance for Ouvea Premix

Appendix D contains a memo from Jacobs to clarify the current status of the Cast-House Ouvea Premix Safety Data Sheet (SDS) and Status of Substance (SoS). The memo also describes the process by which the Ouvea Premix SoS request was made, how the SDS was drafted (including independent testing of Ouvea Premix for composition analysis) and subsequent material testing on Ouvea Premix. The memo also provides a status update on SDS's for Landfill and Bag-House Ouvea Premix.

The memo contains the current SDS for Cast-House Ouvea Premix (dated 12 August 2013). I have also attached the SDS for Aluminium Dross, which I obtained from Taha, as Appendix E to this report. I understand Jacobs was not involved in drafting this SDS.

5. Correct Street Address

I have confirmed with Greg Paterson that the correct street address for the buildings occupied by Taha is as follows:

- The buildings on the river-side of Kana Street have the street address 65-121 Kana Street (Valuation No. 29860/430.00); and
- The buildings on the bank-side of Kana Street have the street address 116-128 Kana Street (Valuation No. 29860/499.00)

6. Communications with NZTA

Appendix F contains a file note regarding the current status of consultation with NZTA. In summary, NZTA provided written approval on the original consent application on 3 October 2014. Through the Officer's section 95 report, we were advised that NZTA had withdrawn its approval. We were further advised from NZTA on 26 March 2015 that NZTA had withdrawn approval as they had concerns about the access arrangements and particularly whether loading / unloading would occur on site.

I discussed NZTA's concerns about loading with James Coutts, Planning Advisor at NZTA. Subsequently, I provided information to NZTA on 7 May 2015 confirming that loading / unloading will occur on site. This will be addressed in the Traffic Management Plan, which is currently being drafted. We have not received any further communications from NZTA on the matter.

7. Draft communications plan through the Community Liaison Group

Taha has advised that they will set up a Community Liaison Group, as suggested by the Commissioners. Appendix G contains a memo from Mr Burgess regarding the status of discussions with the Community Liaison Group. In summary, Mr Burgess has confirmed that Alan Taylor, Howard Alchin and Lindsay Buckingham will meet to discuss the scope and format of the Community Liaison Group on 11 June 2015 and develop a communications plan.

8. Detailed timeframe for removal

Appendix H provides an updated and a more detailed schematic of the project management plan for Taha to develop the site at Awarua and move materials from the Mataura site to Awarua, which was drafted by Mr Lindsay Buckingham, Project Manager. This document will form part of supplementary evidence to be provided by Mr Buckingham by 3 July 2015, including an update on progress with confirming the Awarua site.

9. Company structure and personnel

Mr John Witter is the Managing Director for Taha International for Industrial Services (Bahrain) and Chairman of Taha International S.A (Luxemburg). Mr Witter has provided an overview of the company structure and relationships, and this information will be presented as evidence from Mr Witter by 3 July 2015. In summary:

- Taha International S.A. is the registered company for Taha with the registered company headquarters based in Luxemburg. Taha International Industrial Services W.L.L is the operational company for Taha, with the operational headquarters based in Bahrain.

- Taha Asia Pacific Industries Limited and Taha Fertilizer Industries Limited are New Zealand registered companies. Both companies report to a New Zealand-based Director, who reports to the Company's Chief Operating Officer, who then reports to Mr Witter and the Board of Directors.

- Both the New Zealand Director and Chief Operations Officer positions are currently vacant and the Board is actively recruiting to fill these positions. Two candidates have been short listed and will be interviewed by Taha's equity investors next month. Both candidates have extensive operational experience in the aluminium industry, specifically in the field of dross processing.

- Until the New Zealand Director position is filled, the Board has engaged Mr Buckingham to manage the New Zealand-based operations and specifically to secure an integrated site in

Southland. Br Buckingham reports directly to the Board of Directors. For the time-being, NZ-based managers are channelling information through Mr Buckingham to the Board.

For all matters relating to Taha's operations in New Zealand, Mr Buckingham is the primary contact. This will remain the case until a New Zealand Director has been appointed. Mr Buckingham's contact details are 0275255443 or lindsay.buckingham@xtra.co.nz.

For all operational matters relating to Taha Asia Pacific Industries Limited and its activities at the Tiwai Point Smelter, Maurice Shaw, Plant Manager, is the primary contact. Mr Shaw's contact details are 021 550 218 or maurice@tahacorp.com.

For all operational matters relating to Taha Fertilizer Industries Limited and its activities at Bond Row and in Mataura, Nathan Burgess, Plant Manager, is the primary contact. Mr Burgess's contact details are 027 230 8663 or nathan@tahacorp.com.

10. Next steps

I trust the information I have provided is sufficient. As agreed, Taha and Jacobs will provide all remaining information requested by the Commissioners by 3 July 2015.

Yours sincerely

Tess Drewitt
Environmental Consultant
04 914 8414
Tess.Drewitt@Jacobs.com

CC: Lindsay Buckingham, Project Manager
John Witter, Taha Board of Directors
Nathan Burgess, Taha Plant Manager
Maurice Shaw, Taha Plant Manager
Robert Makgill, Counsel for Taha

Appendix A. Permanent installation of flood protection measures

Memorandum

To: Tess Drewitt, Environmental Consultant, Jacobs

CC: Maurice Shaw, Lindsay Buckingham, Michael Oldenhof, John Witter, Frank Pollmann, Robert Makgill

From: Nathan Burgess, Plant Manager, Taha Fertiliser Industries

Date: 28/05/2015

Re: Assessment of Flood protection measures that could be permanently installed.

PRE FITTING FLOOD PROTECTION PANELS

At the hearing for Taha's resource consent application, it was suggested as a precautionary measure, and to reduce time taken to install panels in a flood event, where possible steel panels forming part of the buildings flood protection, could be fitted permanently.

On Mon 18th May I contacted Tony Dackers, Managing Director of Fire Protection Compliance Limited, for information on which doors could have panels permanently fitted, which would block the door off meaning it could no longer be used as a fire escape.

Tony suggested that permanently blocking the doors with steel panels would not be an allowable practice, as the doorways need to be accessible and usable if there was a fire or emergency situation where people needed to evacuate the building.

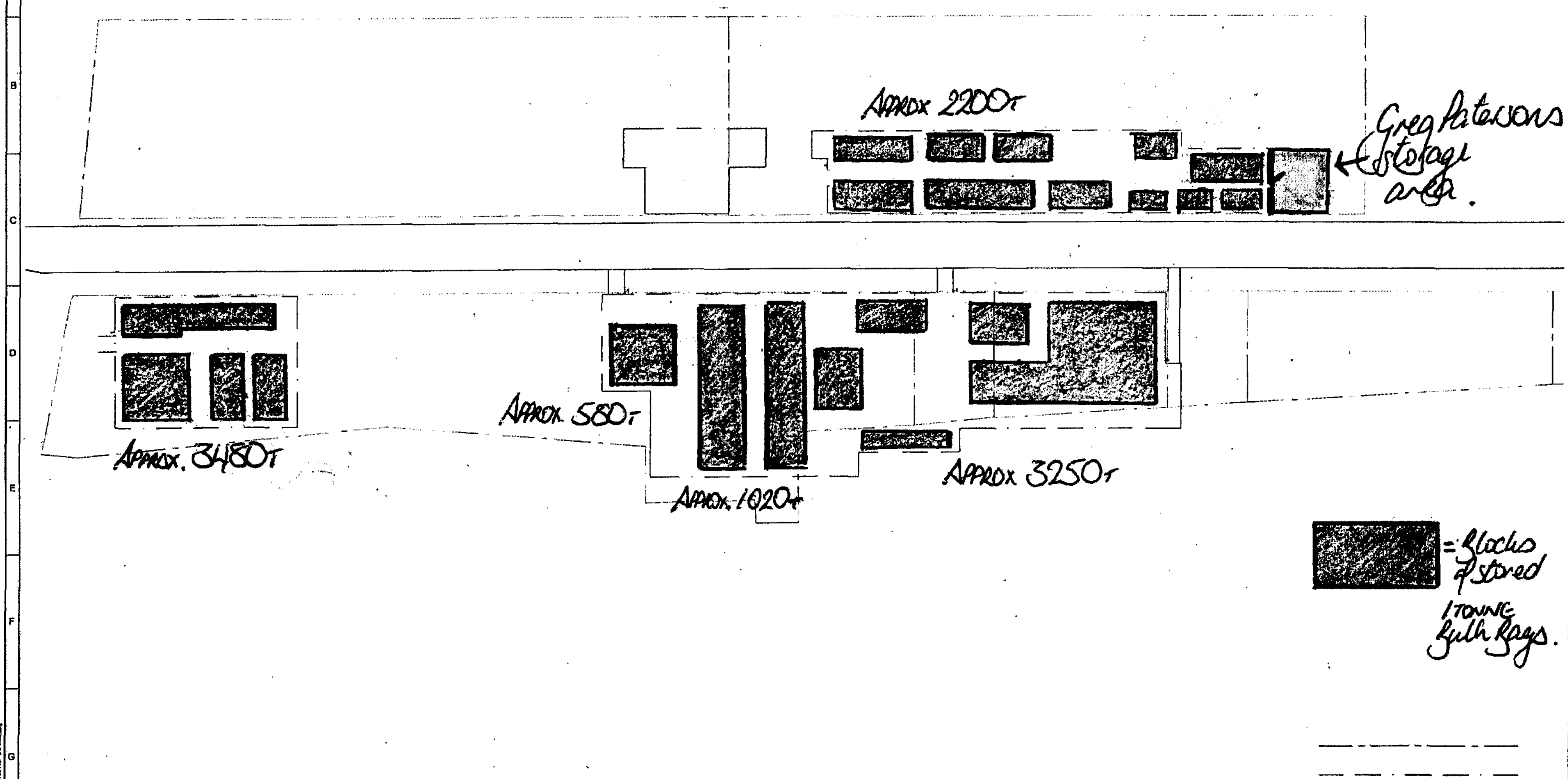
The opportunity exists for some of the larger (roller) doors to have the steel panels fitted to them permanently. These doors are primarily used for loading and unloading goods or vehicle access to the buildings so wouldn't necessarily be used as an exit/escape door in a fire or an emergency situation.

This option has been confirmed as being allowable by Tony Dackers, Managing Director of Fire Protection Compliance Limited.

Erecting these panels on these doors would minimise the overall time to install all panels in a flood event as the time taken and difficulty to fit panels to the larger doors far exceeds fitting panels to the 'man doors'.

We will assess which roller doors will not be required for moving and or removing product, and take the steps to get them fitted where possible. The outcome will be presented as part of the Flood Protection Plan as supplementary evidence by 3 July 2015.

Appendix B. Site Layout Plan



APPROVAL ISSUE

REV	DATE	DRAWN	REV'D	APP'D	REVISION
C	09-03-15	DCC	TD	NC	SITE LAYOUT PLAN SHOWING HAZARDOUS STORAGE ONLY
B	23-09-14	DCC	TD	NC	APPROVAL ISSUE
A	15-09-14	DCC	TD		CLIENT REVIEW ISSUE

DRAWING NUMBER	REFERENCE DRAWING TITLE

JACOBS

CLIENT: TAHA ASIA PACIFIC LIMITED

PROJECT: LAND USE CONSENTS FOR THE STORAGE OF HAZARDOUS SUBSTANCES

DRAWN	DRAWING CHECK	REVIEWED	APPROVED
DCC	TD	NC	NC
DESIGNED: TD	DESIGN REVIEW: NC	DATE 23-09-2014	DATE 23-09-2014

TITLE: MATAURA
KANA STREET SITE PLAN

SCALE: 1:500 | DRAWING No.: AE04729-NEP-DG-0002 | REV: C

A1

Appendix C. Removal on non-Ouvea product

Memorandum

To: Tess Drewitt, Environmental Consultant, Jacobs

CC: Maurice Shaw, Lindsay Buckingham, Michael Oldenhof, John Witter, Frank Pollmann, Robert Makgill

From: Nathan Burgess, Plant Manager, Taha Fertiliser Industries Limited

Date: 28/05/2015

Re: Removal of non Ouvea product

Removal of non Ouvea product

Currently at the former Carter Holt Harvey paper mill in Mataura, Taha Asia Pacific/Taha Fertiliser Industries are storing its product 'Ouvea Premix'.

Currently in storage at the site is 9952 tonne of Ouvea premix, 8 tonne of Sulphate of Ammonia, approx. 350 kilograms of Citric Acid, and up to 100 litres of diesel.

During discussion arising from the recent Resource Consent application hearing, the possibility of removing 'non Ouvea' products from the facility has been mooted.

The removal of the bulk bags containing Sulphate of Ammonia could be easily achieved. This would be best done by back loading a truck returning from Dunedin, using TNL our regular transport company.

At the time of removing the SOA, the 8.473 tonne of MRP Bag House fines (stored in 1t Bulk Bags) could also be removed. This product would be returned to Taha Asia Pacific.

I would suggest that the removal of the Citric Acid would be unwise, as this product is there as a mitigation measure should an isolated amount of Ouvea happen to become wet. (The Citric Acid is utilised to absorb any Ammonia if it is in fact being produced)

In summary the following steps could be achieved:

- Transport SOA to Liddel Street storage facility (Invercargill), which has resource consent to store up to 200 tonne of SOA.
- Transport MRP Bag House fines to Taha Asia Pacific.
- Leave Citric Acid in situ.

Appendix D. SDS and SoS

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Memorandum

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Date	25 May 2015
To	Tess Drewitt, Environmental Consultant, Jacobs
From	Chris Bender, Air Quality Scientist, Jacobs
Subject	**Supplementary information re Safety Data Sheets and Status of Substance for Ouvea Premix**

1. Purpose

This memo provides an overview of the process that Jacobs New Zealand Limited (Jacobs) has followed to:

(a) Apply for the Status of Substance (SoS) for Cast-House Ouvea Premix from the Environmental Protection Authority (EPA); and

(b) Draft the finalised Safety Data Sheet (SDS) for Cast-house Ouvea Premix.

This memo also provides a summary of the material testing that has been undertaken to date to support to SoS and SDS for Cast-House Ouvea Premix, and the status of the SDS's currently being drafted for the following additional materials stored at the Mataura site:

(a) Landfill Ouvea Premix

(b) Bag-house Ouvea Premix

This memo is provided as supplementary information for Taha Fertilizer Industries Limited's (Taha) resource consent application to store Ouvea Premix at its storage site in Mataura.

2. Status of Substance

2.1 What is a status of substance

Anyone can make a SoS request to the EPA to determine whether a substance is hazardous and, if so, whether it is covered by an existing approval. Based on information provided in the application, including product composition, uses, toxicity, and flammability, the advice provided by the EPA determines:

- Whether or not a substance is hazardous
- Whether the substance is covered by an existing approval
- Whether a new approval is required

- What the hazard classifications of the substance are.[1]

2.2 Ouvea Premix Status of Substance

In December 2011, Jacobs (then SKM) applied for a SoS for Cast-house Ouvea Premix. The SoS application was based on testing of Ouvea Premix samples through X-Ray Fluorescence (XRF) analysis undertaken by Coal Research Laboratories (CRL). XRF analysis measures the intensity of X-rays fluoresced by individual elements in a sample. As such, XRF analysis is limited in that it shows the elements present in an individual sample, irrespective of the different compounds in the sample that may contain those elements. XRF testing provides a simple quantitative analysis of a material.

On 7 March 2012, the EPA issued a Determination of the Status of Ouvea Premix based on the information available at the time. The determination said that Ouvea Premix is considered to be hazardous and falls in to the group standard approval *"Additives, Process Chemicals and Raw Materials (Subsidiary Hazard) Group Standard 2006 [HSNOT Approval Number HSR002503]".* The preliminary hazard classification assigned to Ouvea Premix was:

- 6.3A (skin irritant)
- 6.4A (eye irritant)
- 9.1C (aquatic irritant)

Under these classifications, Ouvea Premix is not classified as a Dangerous Good for transport. As such, the Land, Transport, Civil Aviation and Maritime Transport rules for dangerous goods do not apply.

3. Safety Data Sheet

3.1 What is a Safety Data Sheet

The EPA's website describes a Safety Data Sheet (SDS), previously called a Material Safety Data Sheet (MSDS), as a document designed to protect the health and safety of people in the workplace by providing information on the hazards of substances and how they should be safely used, stored, transported and disposed of. SDSs also describe emergency procedures, such as what to do in the event of a spill or fire. SDS's must include information on the material, including:

- hazards identification
- composition and information on ingredients
- first air and fire-fighting measures
- physical and chemical properties
- transport and disposal considerations.[2]

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[1] Explanation sourced from http://www.epa.govt.nz/hazardous-substances/about/SOS/Pages/default.aspx

[2] Explanation sourced from http://www.epa.govt.nz/hazardous-substances/using-storing/Pages/Safety-data-sheets.aspx

3.2 SDS for Ouvea Premix

Following the provision of the EPA's determination, Jacobs prepared a SDS for Cast-House Ouvea Premix, again based on the results of the XRF analysis, which was also provided to the EPA.

Appendix A contains an internal memo dated 24 April 2012 about the HSNO controls for Ouvea Premix. The memo includes (as Appendices) the original SoS application, the SoS determination dated 7 March 2012 and the draft MSDS for Ouvea Premix based on XRF analysis (dated 10 May 2012).

In January 2013, Jacobs arranged for as series of laboratory tests to be performed on six samples of Cast-House Ouvea Premix, which were provided by Taha to determine the composition of the premix. The six samples were sent to CRL for X-Ray Diffraction (XRD) analysis. XRD analysis measures the intensity of crystal diffraction peaks due to the individual chemical compounds in the sample. Non-crystalline (amorphous) compounds cannot be identified by XRD. However, the compounds in Cast-House Ouvea Premix consist almost entirely in crystalline form, and so are well-suited for identification by XRD. As such, XRD analysis, unlike XRF analysis, can estimate percentages of each compound in the Ouvea Premix samples, as opposed to just the elemental composition.

XRD testing provides a qualitative and quantitative analysis of the material. The XRD results give measure and determination of the chemical compounds in Cast-House Ouvea Premix. As such, the results of the tests were used to update the Cast-House Ouvea Premix SDS to its current form. The revised and current SDS, dated 12 August 2013, is attached as Appendix B.

The revised composition of Ouvea Premix as determined by XRD does not change the hazard classification of the substance for the purpose of the SoS, as none of the bulk components of the substance are hazardous in themselves beyond what was originally assumed.

4. Further Material Testing

In 2015, Taha was in contact with the EPA to enquire about the necessary approvals to transport Ouvea Premix off-shore. The EPA suggested that, based on the information available, the Ouvea Premix could be classified as a Class 4.3 hazardous substance (substances which in contact with water emit flammable gases) and be treated as a dangerous good for transport under UN3170 "Aluminium smelting by-products or aluminium re-melting by-products". The EPA noted that if, when tested, the product does not meet the defining criteria for class 4.3 then it would not need to be assigned to UN3170.

Following these communications, Jacobs sent a sample of the Cast-House Ouvea Premix to CRL to conduct a gas evolution analysis of the material and identify whether the material meets the thresholds for a class 4.3 substance. The analysis was undertaken by CRL according to section 4.3 of the UN Part 3 classification procedures, testing methods and criteria relating to class 3 materials.

The gas evolution analysis found that hazardous gasses are capable of being produced on water contact, as is consistent with the available literature. The rate of gas evolution (0.74 L/kg/hr) is less than the limit of 1 L/kg/hr that would classify the sample as a packing group III. The findings of the gas analysis are attached in Appendix C.

As such, the gas analysis confirmed the original assessment that the Ouvea Premix is classified a Class 6 and 9 hazardous substance and not a Class 4.3 substance.

5. Safety Data Sheets for Other Mixes

Taha has asked Jacobs to prepare SDS's for other material mixes stored at the Mataura site, being:

(a) Landfill Ouvea Premix; and

(b) Bag-house Ouvea Premix.

The SDS for the Landfill Ouvea Premix has been prepared as a draft using independent laboratory test results from samples provided by Taha in December 2014.

The SDS for the Bag-House Ouvea Premix material has not yet been prepared, as we consider laboratory tests are warranted to determine the composition of the material. It is likely that the substance will have a slightly different composition from Cast-House Ouvea Premix as it will consist of a finer fraction of the material. A will be sent to CRL for testing on 29 May 2015. We would recommend both XRD and XRF analysis on the sample. The turn-around time for these analyses is dependent on laboratory workload, but is usually around one to two weeks. A formal status of substance application with EPA would be considered following interpretation of these results.

The finalised SDS's for Landfill and Bag-House Ouvea Premix can be submitted as supplementary information by 3 July 2015.

A formal SoS assessment from the EPA has not been requested for either Landfill or Bag-House Ouvea Premix. However, based on the similarities in composition and toxicity, we would expect both mixes to fall under the same group standard and have the same hazard classifications as Ouvea Premix. This is based on the existing analysis of these materials and the largely mechanical processing of the dross materials at the NZAS site.

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Memorandum

Supplementary information re Safety Data

Sheets and Status of Substance for Ouvea Premix

Chris Bender, Air Quality Scientist, Jacobs

Appendix A. HSNO Controls, SDS and SoS

Internal Memo

To	Nic Conland	**Date**	24 April 2012
From	Tim Strange	**Project No**	AE04036
Copy			
Subject	**Description of Hazardous Substances Controls for Ouvea Premix**		

1. Introduction

This document describes the controls that need to be in place for Ouvea Premix under the Hazardous Substances and New Organisms Act 1996.

2. HSNO Classification

The Environmental Protection Authority (EPA) has classified Ouvea premix as:

- **6.3A** Skin irritant
- **6.4A** Eye irritant
- **9.1C** Aquatic ecotoxicant

This product has been assigned to the 'Additives, Process Chemicals and Raw Materials (Subsidiary hazard)' group standard **HSR002503.**

A copy of the Status of Substance request and the letter from the EPA providing the classification of this product is provided in **Appendix A** and **B**. It is recommended that a copy of these be retained on file as a record of the classification under the HSNO regime.

3. HSNO Controls

In order to comply with the Hazardous Substances and New Organisms Act 1996, this product must be controlled in the manner that meets the conditions of the 'Additives, Process Chemicals and Raw Materials (Subsidiary hazard) Group Standard 2006, which are set out in Schedule 1 of the Group Standard.

The Group Standard refers to the following regulations and guidance documents:

- Labelling of Hazardous Substances: Hazard and Precautionary Information (July 2006)
- Hazardous Substances (Identification) Regulations 2001
- The Land Transport Rule
- The Civil Aviation Rule
- The Maritime rule

- Hazardous Substances (Emergency Management) Regulations 2001
- Hazardous Substances (Disposal) Regulations 2001
- Site and Storage Conditions for Toxic, Corrosive and Ecotoxic Substances (July 2006)
- UN Model Regulations
- Hazardous Substances (Tank Wagons and Transportable Containers) Regulations 2004
- Workplace Exposure Standards. Occupational Safety and Health Service, Department of Labour, January 2002.

The following sections describe the relevant requirements as of 26 April 2012. However, any amendments to the Group Standard or associated regulations should be monitored in order to determine whether the requirements change.

Currently this product is not classified as a Dangerous Good for transport. Therefore the Land Transport, Civil Aviation and Maritime Transport rules for DGs do not apply.

3.1 Labelling

This substance may not be sold or supplied unless labelled according to these provisions.

3.1.1 Hazard information

1) Label must provide:
- Product name
- Contact details for NZ importer, supplier or manufacturer
- A 24 hour emergency telephone number

2) Label must state "Read label before use'.

3) The label must include the information contained in **Appendix C**. This information has been obtained from the 'Labelling of Hazardous Substances (hazard and precautionary information)' document published by ERMA New Zealand (now the EPA):

3.1.2 Small Packages

If this product is contained in small packages (5kg or less) the pictogram in column 3 of Table 1 is not required. Neither are the signal words, hazard or response statements for the 9.1C classification.

3.1.3 Disposal information

The label must describe an appropriate means for disposing of the substance (see Disposal below for what is considered to be appropriate)

3.1.4 Multiple packages

If labelling is obscured by outer packaging, the outer packaging must be labelled as per the Table in Appendix C.

3.1.5 Exporting

If this product is being exported from New Zealand it must be labelled as per the Table in Appendix C.

3.1.6 Bulk Transport

If this product is being transported in bulk it must be labelled as per the Table in Appendix C.

3.2 Approved Handler

Approved handler requirements do not apply to this product.

3.3 Material Safety Data Sheets

The following requirements relate to the Material Safety Data Sheets (MSDSs) for this product:

- When selling or supplying this product a safety data sheet will need to be provided unless one has already been provided to the receiver.
- An MSDS should be carried when transporting this product
- The MSDS must be available in every place of work where this product is being manufactured, stored or used
- The MSDS must be readily available (within 10 minutes) and be easy to understand by any fully trained worker
- If asked the manufacturer or supplier of the premix must provide a MSDS to any person in charge of a place of work where this product is stored or used.

3.3.1 Contents of MSDS

Information on an MSDS must provide the following information in the order listed below:

Identification of the substance and supplier

- Product name
- Recommended uses
- Name of supplier, NZ contact details including emergency contact

Hazards identification

- Describe hazards of the substance, which may include its HSNO hazard classification
- Hazard information, including signal words, hazard statement(s) and precautionary statement(s)

Composition/information on ingredients

- Chemical identity of each hazardous ingredient, their CAS number and their concentration ranges

First aid measures

- First aid instructions according to each relevant route of exposure
- Whether medical attention is required and its urgency
- Information on the most important symptoms and effects, acute and delayed, from exposure

Fire fighting measures

- Information on the appropriate type of extinguishers or fire fighting agents, including extinguishers that may not be appropriate for a particular situation
- Any advice on hazards that may arise from combustion products; and
- Precautions for fire fighters and protective clothing requirements

Accidental release measures

- Advice on protective clothing requirements and emergency procedures
- Any environmental precautions from accidental spills and release
- Advice on how to contain and clean up a spill or release

Handling and storage

- Precautions for safe handling
- Conditions for safe storage, including incompatibilities

Exposure controls/personal protection

- Exposure limits set for the substance or any of its components, or in their absence, relevant overseas exposure limits
- Engineering controls
- Individual protection measures, including PPE

Physical and Chemical Properties

- Description of relevant physical and chemical properties for the substance, including units of measurement and reference conditions where appropriate