

Sustainable Use Requirements (S.I. No 155 of 2012)

Pesticide Stores, Pesticide Display & Sales Areas

Mark Lynch, IASIS

David McGilloway, PCD, DAFM

**Irish Agricultural Supply
Industry Standards
Limited**
Reg. No 202978



Chairman: Dr Mark R Lynch
Directors: Brendan Barnes
Paul O'Doherty

Overview

➤ Pesticide Stores

(Wholesale/retail)

Display & Sales Areas

design & construction

management

enforcement issues

➤ Pesticide Stores

(End Users, e.g. farmer)

facilities

management

enforcement issues

Legal Standard

[Article 13 (3)(b) of S.I. No 155 of 2012]

**IASIS Requirements
for the Design &
Construction of
Pesticide Stores**

**IASIS Guidelines on
the Management &
Operation of
Pesticide Stores**

**IASIS Requirements for the Fitting Out
and Guidelines for the Management
and Operation of
Pesticide Display & Sales Areas**

Wholesale & Retail Pesticide Stores

General Requirements

Category A >50,000	Category B >5,000 : <50,000	Category C >1,000 : <5,000	Category D <1,000
Wholesale & Retail Stores must be registered with DAFM by 26 Nov 2015			
Must be dedicated Chemical Stores			
Transport Containers not suitable, may not be used			
Must be separate from Sales Areas, with no public access			
No residential accommodation overhead			
Access must be controlled			
Minimum Capacity = max planned storage + 15%			
Water supply must be available adjacent to the store			

Pesticide Stores - Key Issues

	Category A >50,000	Category B >5,000 : <50,000	Category C >1,000 : <5,000	Category D <1,000
Site selection	<ul style="list-style-type: none"> Access on 2 sides 		XXX	XXX
	<ul style="list-style-type: none"> Not in area with known risk of flooding 			
Bunds	<ul style="list-style-type: none"> 120% of design capacity 190% if in environmentally sensitive area 			
Shelving / Racking	<ul style="list-style-type: none"> Corrosion resistance impermeable materials Timber must not be used 			
Staff Training & Certification	<ul style="list-style-type: none"> A certified distributor must be on duty and available when open for business 			
Records	<ul style="list-style-type: none"> Maintain required records on Goods In & Out 			
Returned Stock	<ul style="list-style-type: none"> Do not treat as new stock 			

Management - Pesticide Stores

Operating Procedures

- Securely lock outside business hours
- Only products authorized by DAFM,
- Rotate Stock – ‘first in first out’
- Place granules and powders above liquids
- Segregate damaged and obsolete stock
- Never place products directly on floor
- Inspect stock for ‘leakers’ at least one per week
- Obsolete stock must be disposed of as soon as possible to prevent deterioration of packaging

Pesticide Display and Sales Areas

Fitting-out Requirements	Professional Use Products	Amateur Use Products
➤ Direct access to open air	✓	✓
➤ Separate from Pesticide stores	✓	✓
➤ Distance from food and feed	5m	2m
➤ Maximum quantity of pesticides stocked	500kg/L	500kg/L
➤ Impermeable non-slip floors, resistant to chemicals, no cracks, easy to clean	✓	✓
➤ Cabinets, Shelving Counters must be corrosion resistant, No Timber	✓	✓
➤ Emergency eye wash, clearly identified in display area	✓	✓



Pesticide Display & Sales Areas (2)

Management	Professional Use Products	Amateur Use Products
➤ Must be registered with DAFM by 26 Nov 2015	✓	✓
➤ Only products authorized by DAFM	✓	✓
➤ T or T+ Pesticides must be secured	✓	X
➤ A certified distributor must be on duty and available when open for business	✓	✓
➤ Only Registered Pesticide Advisors may advise on selection and use of products	✓	X
➤ Display information on risks for human health and the environment	X	✓

Pesticide Display & Sales Areas (6)

Operating Procedures

- **Rotate Stock – ‘first in first out’**
- **Inspect returned professional use products, to ensure may be sold and packaging and label intact**
- **Returned stock – do not treat as new stock**
- **Place granules and powders above liquids**
- **Segregate damaged and obsolete stock and identify as such**
- **Never place products directly on floor**
- **Maintain required records on Goods In & Out**
- **Old stock that may no longer be sold or used must be disposed of as soon as possible to prevent deterioration of packaging**

Enforcement Issues

General comments

All facilities visited from 2016 onwards will be inspected to establish compliance with current guidelines. Store managers can expect a more forensic inspection dealing with: -

- Record keeping – for particular products, may be asked to provide details of ‘goods-in’, and a list of all customers supplied with product. Inspector will carry out a store inventory for the product, reconciling the figures with other records.
- Checks on Distributor training and registration.
- Store registration and compliance.
- Product registration and compliance

Enforcement Issues

Problems identified on inspection this year: -

- Poor stock rotation – new product placed in front of ‘old product.
- Revoked product outside of sell-by date, to be classified as hazardous waste (EPA legislation).
- Significant volumes of biocidal products not bearing PCS No.
- Aware of SUD in general, hazy on specifics.
- Cash sales of PPPs still occurring in 2015.

Pesticide Stores – End users (1)

General requirements - size matters! The store should reflect the maximum volume of pesticide product stored at any point in time. It can be a stand-alone building, container/press/cupboard/filing cabinet etc. which is;

- Independently lockable, and
- capable of containing spills.

On-farm pesticide stores must have:-

- A warning sign affixed at the entrance to the facility
- In the case of a walk in store – be well ventilated

On farm storage facilities – the ‘good’



On farm storage facilities – *the bad*



On farm storage facilities – *the ugly?*



Pesticide Stores – End users (2)

Within the store;

- Powders should be stored separately and/or above liquids
- Products must be stored in original containers with labels attached
- Facilities to clean-up spills must be available e.g. sand/peat.

Product Rotation;

- Ensure that products are used in a '*first in – first out*' rotation
- Ensure that products past their '*use-by date*' are not applied, and are correctly disposed of
- Consign obsolete pesticides for hazardous waste destruction (check press for details of regional collection programs)

Pesticide Stores – End users (3)

Handling

- Appropriate Personal Protective Equipment (PPE) must be used at when handling and applying pesticides. This equipment should be clean and properly maintained.
- Appropriate measuring equipment – designated solely for weighing/measuring pesticide products must be available.

Usage

- Only use PPPs or biocidal products listed on the respective registers of approved products (www.pcs.agriculture.gov.ie)
- Only use products in accordance with the product label instructions *e.g.* crops, correct rate and timing.

Pesticide Stores – End users (4)

Usage (continued)

- Ensure sprayer is fit for purpose and properly calibrated - within the previous 12 months. Under SUD all boom sprayers > 3m must be tested by registered tester by Nov. 2016.
- Only use products in accordance with the principles of Good Plant Protection Practice (GPPP)
- Apply the principles of Integrated Pest Management (IPM), and be satisfied that the application of a pesticide provides the most appropriate means of control
- Ensure that empty pesticide containers are triple rinsed and disposed of in a safe manner

Pesticide Stores – End users (5)

Record Keeping

- An annual IPM assessment is required for each holding (www.pcs.agriculture.gov.ie/sud/integratedpestmanagement/)
- Details of all purchases, applications (by yourself and/or contractor), and disposal
- Product application records must include; Product Name, PCS No., Field Location/Identifier, Crop, Area Treated, Product Application Rate, Date of Application, Reason for Application, Professional User No. of person applying product

Pesticide Stores – End users (6)

Herd No:

Pesticide Application Record

Year:

[illegible]

Type of Nozzle on Sprayer _____ STRIPE 75% ☐ STRIPE 90% ☐ NON STRIPE ☐ Used a contractor ☐

Make of Sprayer _____ **Model of Sprayer** _____ **Tank Capacity** _____ **Date sprayer last tested** _____

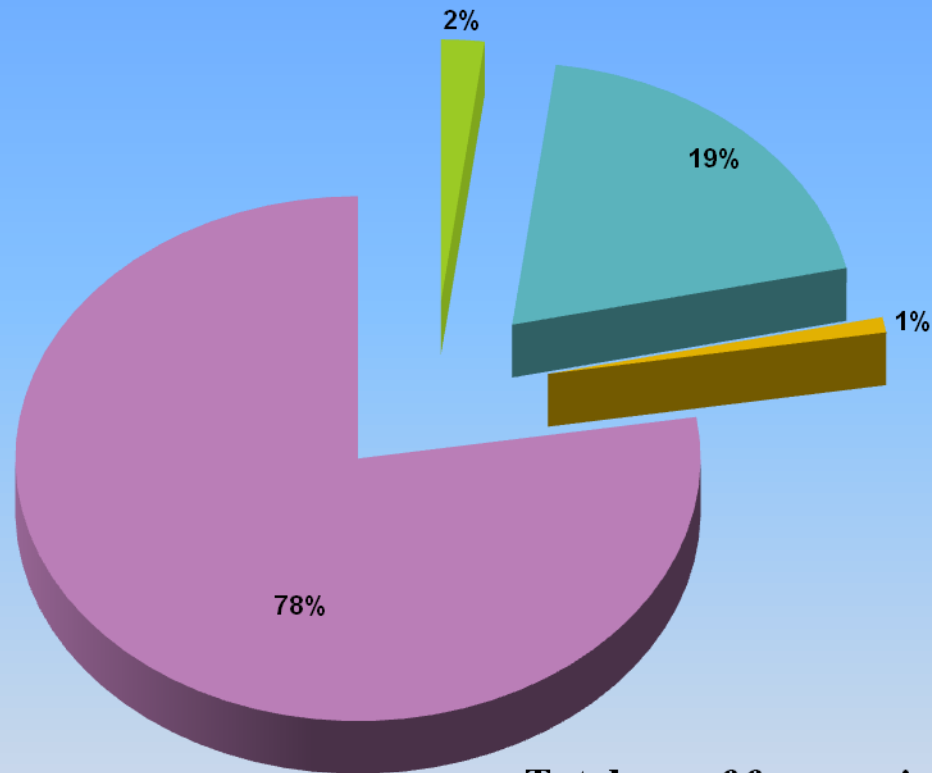
End users – enforcement issues (1)

➤ Record Keeping

- Records not being kept.
- Inaccurate records – inspectors store inventory conflicting with records provided to PCD
- Incorrect rates of use/crops

End users – enforcement issues (2)

% Farm category Inspected in 2013*

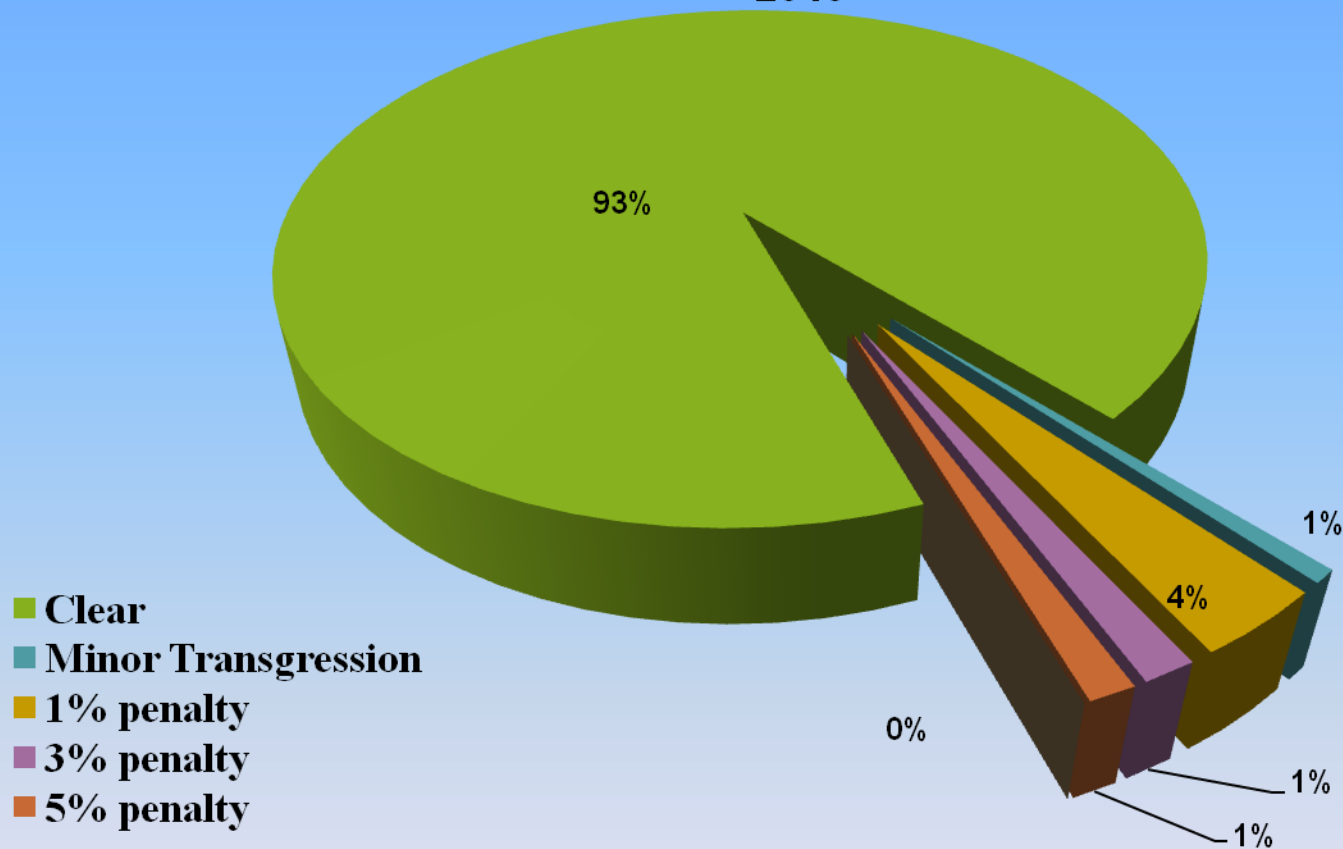


***Total no. of farmers inspected = 1273**

■ A (Fruit & Veg) ■ B (Cereals) ■ C (Forestry) ■ D (Grassland)

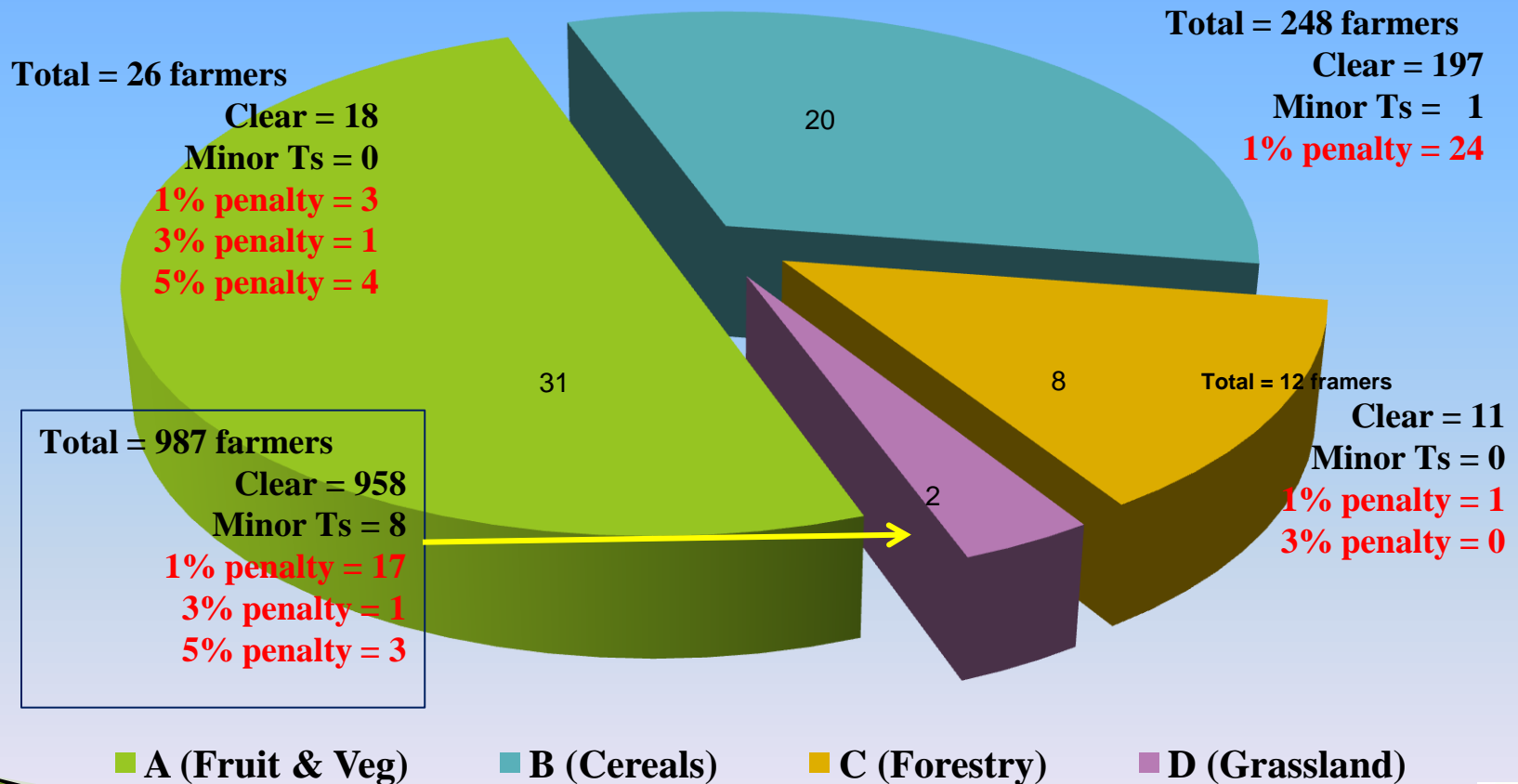
End users – enforcement issues (3)

Breakdown (%) Compliance penalties applied re: **PESTICIDES** in 2013



End users – enforcement issues (4)

Breakdown (%) of financial penalties applied (re PESTICIDES) by farmer category (2013)



End users – enforcement issues (5)

Breakdown (%) financial penalty (re Pesticides) x default category (2013)

