



Why keep records?

Keeping accurate and detailed records is an essential part of modern farming, a basic requirement of good management and farm assurance schemes. It is also a legal requirement for many aspects of storing and using sprays.

Spray record keeping need not involve vast amounts of paperwork, but it does require some organisation and management. Whilst it may seem tedious, the modest investment of time and effort involved will be repaid by numerous benefits.

- **Traceability.** Quality assurance schemes such as the Assured Combinable Crops Scheme and Assured Produce demand a 'cradle to grave' history of each crop, of which the spraying records form a vital part.
- European **Food Safety Legislation** requires records to be kept of any pesticides use on food crops
- **Accountability.** Farmers are increasingly under pressure not only to adopt sound practices but also to be able to demonstrate that they are doing so. Records provide the peace of mind of knowing that answers are available if questions are asked.
- **Measures of performance** against pre-set expenditure or environmental targets in an ICM system.
- **Provision of information**, for example to emergency services in the event of fire, theft or an accident. Also, information to meet enquiries from bankers, insurers, neighbours or staff.
- Better and more economical **stock management** of pesticides in the store.
- Fulfilment of **legal obligations** to workers under COSHH Regulations and Code of Practice.
- Achievement of ISO 9002/BS7750 **accreditation**.
- **Internal auditing** purposes to help identify areas for action or improvement.

Legal Requirements

EU regulations on the hygiene of food-stuffs and feed for livestock have been in place since 2006. The regulations require that anyone who produces or harvest plants for human or animal consumption must keep records of any plant protection products they use. Although these new regulations apply only to food crops, the government has made it clear that they expect all professional users to keep good records and legislation to this effect may be introduced in the future.

Operator safety and health

- Keep all records of maintenance checks on sprayer performance for at least five years
- In all but simple and obvious cases, a written record of any COSHH assessment must be kept. The assessment must record the risks that have been identified and the steps necessary to control the exposure.
- Regular health surveillance may be needed if operators are likely to use any product that may affect their health and there is a reasonable likelihood that this health effect may occur. Personal records must be kept for 40 years. (In practice this is most likely to apply where anti-cholinesterase organophosphate or carbamate – based compounds are used). Ask the HSE's ErgAS for advice.
- Exposure records that do not involve individuals should be retained for five years.
- Record details of all equipment testing, especially Respiratory Protective Equipment, and keep records for five years.

Before spraying

- Check that spray operators have valid Certificates of Competence for all application machinery they may have to use. Keep a photo copy of the certificates and NROSO membership certificate in safe place so that they can be produced on demand. The operator should retain the original.
- Record dates and detail of sprayer overhaul and maintenance checks as well as the NSTS test.
- Record date and detail of pre-season calibration check.
- If appropriate, record contacts with local beekeepers via the local NFU beekeepers liaison officer.
- Record the results of your COSHH assessment.
- Maintain a pesticide purchase record and a stock list in the store and in the farm office.
- Record with dates all movements of stock in and out of the store to allow operation of a 'first in, first out' rotation policy thus avoiding the risk of leaving products to deteriorate on the store shelf.
- If appropriate, do a LERAP (Local Environmental Risk Assessment for Pesticides) assessment and retain it for three years.
- Check whether a groundwater permit is required from the Environment Agency/SEPA for disposal of dilute waste pesticides.

When spraying, keep records on a field by field basis

- Record product used, dose, application volume and reason for treatment*.
- Operator's name
- Equipment used
- Date and time
- Wind speed and direction
- Other weather conditions such as temperature and rainfall
- Growth stage of the crop
- The harvest interval (if any) to be observed and harvest date
- Details of Personal Protective Equipment used
- Confirm that a LERAP has been followed
- When applying a product under a specific off-label approval (SOLA) is used, record the "Notice of Approval" Number. This is a requirement of the Fresh Produce Consortium's Code of Practice for Pesticide Control
- Where a contractor is used, ensure that these records are noted and that copy of them is kept at all times on the farm and retained for at least three years.
- Keep records of any aerial applications in accordance with the rules outlined by the Civil Aviation Authority (booklet CAP414).
- Make a note of any queries raised with you by neighbours or bystanders

*Reason for treatment

Accurately identifying and recording the main targets for control: e.g. black-grass (not "weeds"), can help in assessing success of the control and planning for future seasons. Recording the reason for treatment can also be a requirement for some assurance schemes.

After spraying

- Record method of disposal of surplus diluted product and the sprayer washings.
- Record method of disposal of empty containers. Keep any waste transfer notes provided by your waste/recycling contractor
- Record general health of crop and degree of pest control achieved.
- Record putting up warning signs (if relevant).
- At harvest record crop yield and relevant quality measurements.
- Record post harvest treatment and spraying (above)

Keeping Records

Retain most records for five years; but records on health surveillance and monitoring individual exposure must be kept for 40 years.



This Guide is produced by the Crop Protection Association and has been updated as part of The Voluntary Initiative.

The Voluntary Initiative is a programme of measure agreed by Government to minimise the environmental impact of pesticides.

www.cropprotection.org.uk

www.voluntaryinitiative.org.uk

