

## Summary of SMR 10 Pesticides Cross Compliance Requirements

SMR10 seeks to ensure that where pesticides are used, this use is necessary, and that they are used in a manner that minimises risk to the user, the environment and the food chain.

Pesticides comprise both Plant Protection Products (PPPs) and Biocidal products.

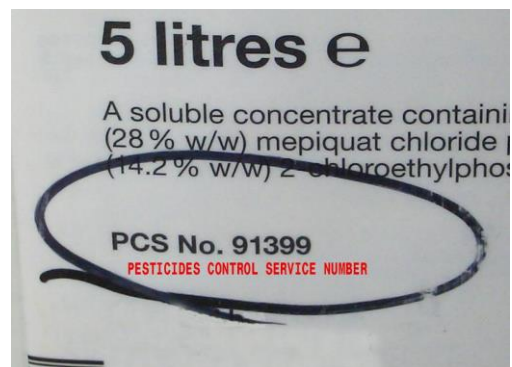
PPPs are used to protect crops from damage caused by pests, e.g. insects, fungi, weeds etc., and to regulate their growth, and include the following:

- Herbicides
- Insecticides
- Fungicides
- Plant Growth Regulators
- Seed Dressings
- Molluscicides
- Fumigants

Biocidal products are products used to control the actions of a wide range of harmful organisms. Dairy hygiene products and rodenticides are some of the more common biocidal products found on farms.

All pesticides purchased and used must be registered with the Pesticide Control Division (PCD) of the DAFM. This registration requirement ensures that companies placing such products on the market have them properly labelled and packaged, and that they bear a valid registration number. This will take the form of a Pesticide Control Service Number (PCS No.), or in the case of some biocidal products a Biocidal Product Authorisation Number (IE/BPA).

Registers of currently approved PPPs and Biocides may be found at [www.pcs.agriculture.gov.ie](http://www.pcs.agriculture.gov.ie). The use of a product that has not been registered, or the use of a registered product in a manner that is not in accordance with the label instructions is illegal and will result in penalties being applied following inspection.



## Storage Requirements

The size of a chemical store should reflect the maximum volume of pesticide product stored at any point of time. It can be a stand-alone building, container, press/cupboard/filing cabinet etc., which is independently lockable, and is capable of containing spills – see link for further information:

[www.pcs.agriculture.gov.ie/sud/professionaluserssprayeroperators](http://www.pcs.agriculture.gov.ie/sud/professionaluserssprayeroperators)

Dedicated storage facilities (chemical store) **must:**

- Have a warning sign affixed at the entrance to the store
- Be secure, lockable, and capable of containing spillages (bunded)
- In the case of a walk in store, be well ventilated

Within the store

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



**NOTE: Dairy farmers may store limited quantities of dairy hygiene products that are used on a regular basis within the milking parlour/dairy. Care should be taken to ensure that there is no/minimal risk of contamination arising from this storage.**

## Product Rotation

You should:

- 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 farming press for details of regional collection programs)

## Handling

### You must:

- Have and use appropriate Personal Protective Equipment (PPE) at all times while handling and applying pesticides. This equipment should be clean and properly maintained
- Have appropriate measuring equipment designated solely for weighing/measuring pesticide products



## Usage

### You must:

- Only use PPPs or biocidal products listed on the respective registers of approved products - see [www.pcs.agriculture.gov.ie](http://www.pcs.agriculture.gov.ie)
- Only use products in accordance with the product label instructions e.g. crops, correct application rates and timing of application
- Ensure application equipment is fit for purpose and has been **properly calibrated** within the previous 12 months
- Use PPPs in accordance with the principles of Good Plant Protection Practice (GPPP)

## Record Keeping

### You must keep records to include:

- Details of all purchases, applications (by yourself and/or contractor), and disposal
- Product application records must include; crop, area treated, product name, PCS No. rate of application, date of application, reason for application and Professional User No. (PU) of the person who applied the treatment

## Principles of Good Plant Protection Practice (GPPP) include:

- Optimal practice in the use of each PPP
- Correct choice of active substance
- Selecting the appropriate application rate
- Number, timing and frequency of applications
- Method of application
- Strategies to reduce spray drift
- Resistance management

The objective is to minimise residue risk and reduce operator exposure. Safe usage takes account of occupational and public health, animal and environmental considerations. It also dictates the minimum application rate(s) required for effective pest control, that is applied in a manner so as to leave the least residue practicable. It is considered good GPPP when farmers comply with the conditions of the product registration.

See - [www.pcs.agriculture.gov.ie/sud/professionaluserssprayeroperators/](http://www.pcs.agriculture.gov.ie/sud/professionaluserssprayeroperators/)

### **Principles of Integrated Pest Management (IPM)**

IPM requires that consideration be given to alternative methods of pest control, rather than relying exclusively on pesticides. Would certain cultivation practices reduce/eliminate the requirement for pesticide usage? By selecting for reduced straw height and disease resistance can a pesticide application be omitted, or the application rate/frequency reduced? It does not require that pesticides should not be used, but rather that alternative options of disease control be considered and used where appropriate. Detailed information on the Sustainable Use Directive (SUD) and IPM can be found at:

[\(http://www.pcs.agriculture.gov.ie/sud/\)](http://www.pcs.agriculture.gov.ie/sud/)

You should:

- Apply the principles of Integrated Pest Management (IPM), and be satisfied that the application of pesticides provides the most appropriate means of control
- Ensure that empty pesticide containers are triple rinsed and disposed of in a safe manner
- Carry out an IPM assessment for the holding – see [www.pcs.agriculture.gov.ie/sud/integratedpestmanagement](http://www.pcs.agriculture.gov.ie/sud/integratedpestmanagement)

### **SMR 10 Inspections**

The inspecting officer will check that:

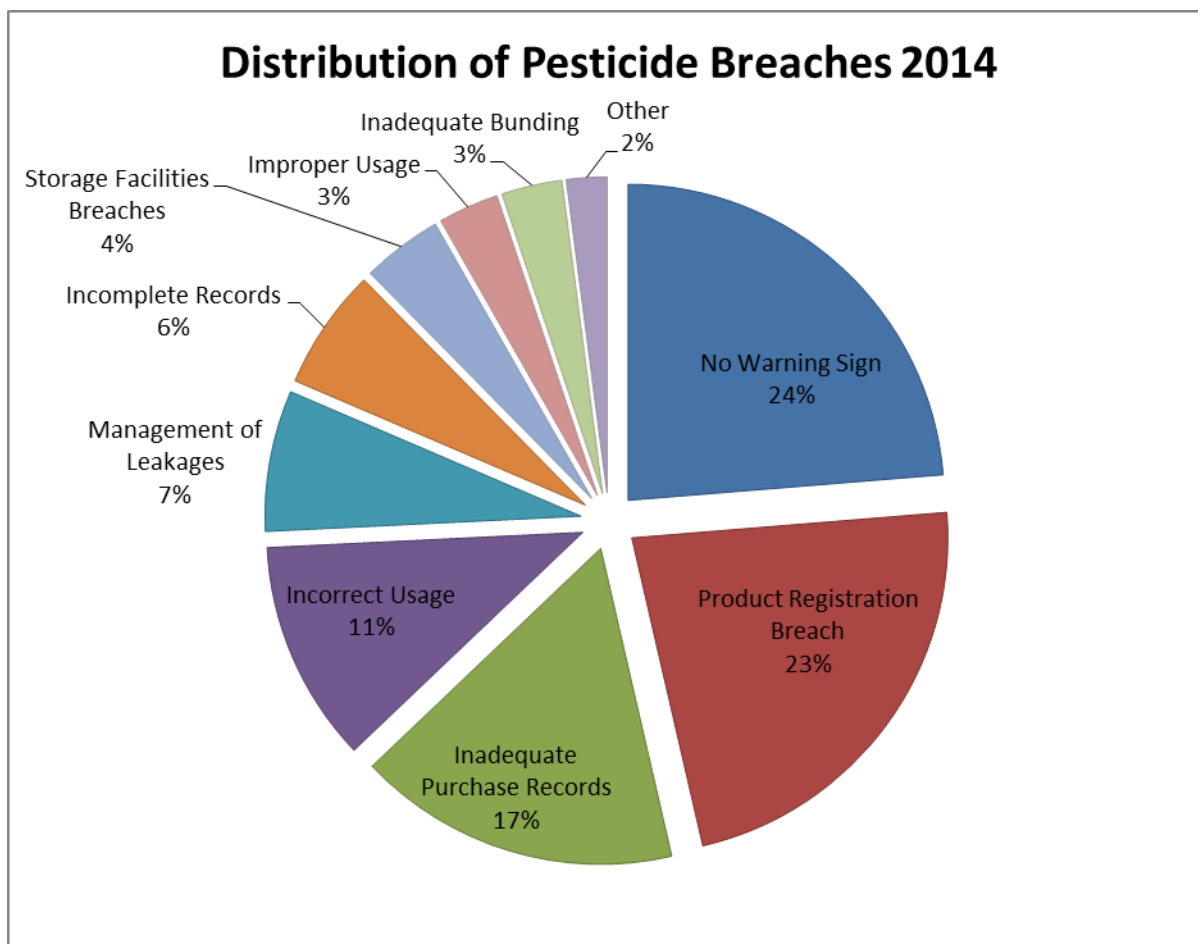
- The dedicated storage area is identified, secure (warning sign), lockable, and capable of containing spills
- There is absorbent material available e.g. bucket of sand/peat
- Protective equipment/clothing for handling PPPs are available
- Powders are stored above liquids to avoid contamination and products are in their original containers
- Records of PPP usage and IPM are being maintained

The inspecting officer will record:

- Sprayer details to include calibration within the previous 12 months and from 26 November 2016 date of testing and test certificate serial number or date of purchase if less than 5 years old
- Details of all pesticides found in the pesticide store (Note that there should be no pesticides on the holding which are not stored within the pesticide store)
- Professional User Number of person applying PPPs
- The Inspecting Officer will require the applicant to complete an application worksheet for all PPPs applied on the holding over the 12 month period prior to the inspection
- From 2016 the inspector will require details about how and where you fill and wash your sprayer, and may require to see any water collection facility or bowser

Based on the records provided, DAFM will review the inspection findings with regard to:

- Product registration – is the product currently registered with PCD?
- Product application rates – are these correct?
- Is the product appropriate for the crop indicated?
- Are Inspection findings in accordance with the Principles of GPPP?
- Are inspection findings in accordance with Integrated Pest Management?
- Is the application equipment suitable for the application of the product?



*Figure 1: Distribution of Pesticide breaches in 2014*

#### Further Information

Cross Compliance requirements

<http://www.agriculture.gov.ie/farmerschemespayments/crosscompliance>

Approved plant protection products

Approved biocidal products

Sustainable Use of Pesticides Directive

<http://www.pcs.agriculture.gov.ie>