

As we get into the busy spraying season this note serves as a reminder of the obligations of the Sustainable Use of Pesticides Directive (SUD) as they affect farmers, advisors and the retail trade.

The SUD comprises four basic elements which, together, combine to reduce the risks posed to man, the environment and the food chain from the handling and use of pesticides. The four elements are:

- Training and registration
- Testing of application equipment
- Controls on storage, supply and use
- Integrated Pest Management (IPM)

The SUD aims to achieve a balance between ensuring human and environmental safety whilst, at the same time, maintaining the viability of the farming and amenity sectors. For the present, only Plant Protection Products (PPPs) are included within the scope of the actions proposed in the SUD.

PPPs are used to protect plants from diseases or pests (or to control the growth of plants) in agriculture, horticulture, forestry, amenity, home/garden and non-crop areas, and by their nature are biologically active and designed to control organisms which are harmful to crops, eg weeds, insects, plant pathogens which are injurious to the health of the plant or plant product.

Professional Users (PU)

Since 26 November 2015, only a registered Professional User (PU) can apply pesticides authorised for professional use. Registration requires that a certain standard of training has been achieved, eg QQI/FETAC 5N0731 (handheld), QQI/FETAC 5N1797 (boom sprayer), City & Guilds PA1 & PA2/6, Lantra PA1 & PA2/6. **Some individuals may already have reached the required standard if they completed a relevant module when completing various Teagasc courses (check with Teagasc if the course you completed qualifies you – see <http://www.teagasc.ie/training/courses/pesticide-training.asp>).**

Once you have achieved the relevant qualified standard, you must still apply online to register with the DAFM at <http://www.pcs.agriculture.gov.ie/sud/sudreg/>. If you are not a registered PU, ie you do not have a PU number from DAFM, you are not permitted to apply professional use products. Also be aware that if you are subject to a DAFM inspection, eg Cross Compliance etc., **you will be required to provide proof of the qualification claimed by registering.**

As well as being registered, end-users (farmers) are required to maintain accurate records of use for all PPPs used by them (or another registered user) on their holding. Every farmer is obliged to keep these records regardless of whether he/she is the PU who applied the product or not. These records of use must be available for inspection if requested by an authorised officer of the DAFM. A template for the information required can be downloaded at <http://www.pcs.agriculture.gov.ie/sud/professionaluserssprayeroperators/>

It is essential to record what you used on the day it is used. **DO NOT LEAVE IT TO THE END OF THE WEEK OR UNTIL THE INSPECTOR CALLS TO THE DOOR.**

Additionally there is a requirement that PPPs be stored in a locked, dedicated store, which is bunded so that accidental leakage cannot result in release to drains, wells or water courses. Stores do not have to be purpose built, but virtually all end-users will require some amount of storage capacity. It is generally not acceptable to claim that there is no requirement for chemical storage because all product is used on the day it is purchased. You should also be aware that retailers are now required to keep records of all sales of PPPs, and must provide the same to the DAFM if requested.

In addition to the requirement that all users of professional PPPs be trained and registered, the equipment used to apply these products must also be fit for purpose. From 26 November 2016, all sprayers with a boom width greater than three meters, and all orchard and blast sprayers, will have to be tested by DAFM registered inspectors. These inspectors will be independent contractors, trained to a recognised standard, to carry out an agreed testing protocol and issue a certificate of compliance following the successful completion of the test.

The inspection interval must not exceed five years up to 2020 and then every three years thereafter. A list of approved sprayer inspectors is available on the DAFM website see <http://www.pcs.agriculture.gov.ie/sud/equipmentinspectors/>. All registered sprayer testers are subject to DAFM audit to ensure that appropriate standards are being maintained.

Integrated Pest Management (IPM)

The SUD also requires that farmers demonstrate the implementation of IPM on their holding, ie that the farmer considers other options prior to resorting to PPPs, eg topping to control weeds, the use of disease resistant varieties to reduce/eliminate the need for fungicidal sprays, etc. Many farmers are already practicing IPM strategies, but do not appreciate that this is the case.

The DAFM have developed an IPM check sheet, whereby the farmer indicates the IPM practices that are being implemented. This check sheet should be completed annually by all land owners and must be available for inspection by authorised officers of the DAFM – see <http://www.pcs.agriculture.gov.ie/sud/integratedpestmanagement/>.

Additionally, records of PPP usage must now show the requirement to justify the use of all products listed in the worksheet.

Professional Advisors (PA)

The SUD requires that all pesticide advisors practising in Ireland are registered with the DAFM. To be included on the current list you must have completed the new Level 7 Professional Diploma in Integrated Pest Management and the Sustainable Use of Pesticides or be the holder of an equivalent qualification deemed acceptable to the DAFM. The list of currently approved PAs is available at www.pcs.agriculture.gov.ie/SUD.htm.

Professional advisors are also obliged to comply with requirements for Continuous Professional Education (CPE) and it is the responsibility of each PA to make provision for their personal CPE credits to be recorded and maintained. Irish Agricultural Supply Industry Standards (IASIS) have developed CPE rules for PAs, and this system of CPE credit allocation, (and the recording and maintenance of these credits) has been recognised as meeting the CPE requirements of the DAFM.

If you wish to use this system for the purposes of recording your CPE, you must apply to IASIS (www.iasis.ie). At the end of every year the DAFM will receive a list from IASIS of the PAs who have met their CPE requirements, hence allowing them to remain on the DAFM register of approved PAs. To familiarise yourself with the CPE rules, go to: www.iasis.ie/advisors.php. Additionally the DAFM may choose to recognise alternative CPE systems in the future. As a registered PA, you are automatically considered to be qualified as a PU **but you must still register to be included on the PU list.**

Retailers

From 26 November 2015, all outlets selling PPPs (professional or amateur) had to be registered with the DAFM. These obviously include agricultural businesses but also hardware shops, garden centres and any other outlets stocking such products. Since that date it is illegal to sell such products without registration. A facility for registering premises will be available in due course on the DAFM website – see www.pcs.agriculture.gov.ie/sud/pesticidedistributors/.

For businesses with multiple outlets, each individual outlet will have to be registered. Registering a premises commits the owner/manager to ensuring that the store and/or retail space for plant protection

products complies with the standards determined by the DAFM. Details of the standards required are available on the PCS website. These vary depending on the size of the business.

In addition to the above, it is also a requirement that each outlet has a qualified/trained individual on site at all times to provide information on product use, health and environmental risk and safety. Such individuals, known as Pesticide Distributors (PDs), must complete the FETAC Level 5 course in Handling and Distribution of Pesticides, developed by IASIS (www.iasis.ie). An online course for smaller businesses selling only PPPs for non-professional use is also available.

Since the start of 2014 it has been a requirement that full traceability is in place for all professional use PPPs brought placed on the market. This is to enable traceability on all products from the wholesaler to the end user. Whilst farmers are required to maintain records for three years, retailers will have to maintain records for five years and may be asked to present such records on inspection by the DAFM.

Main points

- ☞ *The Sustainable Use Directive requires training and registration of all those in the PPP chain.*
- ☞ *Testing and inspection of equipment – all sprayers must be tested by 26 November 2016.*
- ☞ *SUD provides for controls on the storage, supply and use of PPPs.*
- ☞ *All users are obliged to practice IPM and to record how that is being done.*