

Record keeping and storage requirements for pesticides

Based on feedback from a number of recent on-site farmer visits carried out by DAFM, it is apparent that the requirement to keep records of all pesticides applied on the holding is not being complied with by many SPS applicants. Also many applicants have substandard facilities in place for the storage of the pesticides they use. It seems to be a particular issue on grassland farms engaged mainly in livestock enterprises.

The reasons advanced for the failure to comply with the requirements for record keeping relate, in some cases, to a lack of awareness as to what a pesticide is. For example, some farmers do not consider 'Roundup-type' products to be a pesticide. A significant number of applicants claimed that it was too onerous to expect that such records be maintained.

To be clear – the use of all pesticides used by a professional user must be recorded. [All farmers are considered to be professional users.]

The following are examples of pesticides frequently used by grassland farmers, the use of which must be recorded.

Table 1. Examples of pesticides found on grassland farms in Ireland

	Pesticide	PCS Number
Herbicide	Roundup	02317
	Grazon 90	90698
	Mortone	91881
	Ban Dock	90135
	Nettle Ban	90776
	Rosate 36	03616
	Forefront	02793
Insecticide	Decis EC	90496
	Barclay Clinch XL	90168
	Dursban 4	90541
	Trigger	04628

It cannot be over-emphasised that the failure to produce valid records of pesticide usage will incur a direct penalty under the SPS, and may also have 'knock on' consequences for other schemes such as REPS and AEOS. In addition, a subsequent non-compliance under SMR9 (pesticide component of the Cross-Compliance Inspection) in any of the following 3 years could lead to a further substantial deduction from the SPS payment.

This may seem draconian, but in signing up for the SPS, the applicant undertakes to comply with the relevant legislation. Record keeping with respect to pesticide usage is one of the requirements of the contract you sign with the DAFM. It makes no

sense to risk incurring a penalty for what is a fairly simple and straight forward exercise for the majority of farmers.

Issue 4 in this series of articles explained what was required with regard to keeping records in some detail. Several individuals have asked if there was a book, similar to the herd register, for recording such information. No, is the short answer, but such a record book may result from finalising the details of the Sustainable Use Directive.

In the meantime, it is suggested to purchase a decent notebook, read all labels on the products used, and record the information detailed in Table 2 below. A copy of the Pesticide Application Record Log may be downloaded from the following website:

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

Remember,

- pesticides, if not used correctly, are potentially dangerous to the user, the consumer of the produce and the environment;
- keeping accurate records protects end users from the, often unfounded, allegations of improper use;
- where residues are detected, a failure to keep accurate records makes it more difficult to demonstrate that pesticides are being used according to the conditions of the registration and, as well as the financial penalty, the use of these products will inevitably become more restricted, and possibly be removed from the market;

Final thoughts -

- As an SPS applicant, you have undertaken to comply with the statutory requirements;
- Protect your business and future income – comply with the requirement to keep records;
- Records indicate responsible use – **if you are not inclined to keep records, do not use pesticides**;
- Triple rinse empty containers and dispose of all containers safely – see leaflet in previous edition of IFJ.

Note 1 – before using a product in a knapsack, check to make sure it has approval for use in a knapsack!

