Storage and Record Keeping Requirements for End Users of Professional use Plant Protection Products

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This document outlines the current minimum storage and record keeping requirements for End Users of professional use plant protection products.

**Use of plant protection products**

A person shall only use a plant protection product -

(a) in compliance with conditions and directions stated on the product label,

(b) in accordance with the principles of good plant protection practice, and

(c) where possible, in accordance with the principles of integrated control.

**Storage of Plant Protection Products**

Storage facilities maintained and operated by end users of plant protection products for professional use, shall satisfy at least the following requirements –

(a) the structure of the storage facility shall be such that -

(i) it is not connected to a pack-house or area where food products are present,

(ii) it is a dedicated chemical store and is not used for any purpose other than storage of plant protection and biocidal products and other chemicals,

(iii) it is enclosed and of sound construction,

(iv) it has a secure lock,

(v) in the case of walk-in stores, it is well ventilated,

(vi) it is well lit,

(vii) its construction is such that leakages or spillages are retained within the store,

(viii) shelving provided is made from non-absorbent materials, and

(ix) a warning sign is displayed on the entrance to the store;

(b) facilities that shall be available and used, as appropriate, shall include at least -

(i) a list of key emergency contact numbers displayed near the entrance of the store (e.g. doctor, fire service),

(ii) recommended protective clothing and equipment, clean and properly maintained,
(iii) a regularly calibrated weighing scales, designated and labelled for weighing plant protection products only,

(iv) measures for liquid plant protection products, designated and labelled for measuring plant protection products only, and

(v) facilities for soaking up small spillages or leakages (e.g. bucket of sand or peat); and

(c) the operating procedures followed, shall include the following -

(i) powders shall be stored separately from or above liquids,

(ii) plant protection products shall only be stored in their original containers,

(iii) an appropriate area shall be used for measuring and mixing plant protection products,

(iv) only plant protection products included on the register of plant protection products may be acquired and stored.

Record Keeping

End users of plant protection products for professional use, shall maintain at least the following records which on request made shall be produced for inspection by an authorized officer –

(a) the name and address of the supplier of product and for each such product,

(i) the brand name of each product received,

(ii) the PCS number of each product received,

(iii) the pack size or sizes and quantities of each product received,

(iv) the quantity of each product received (kilograms or litres);

(b) for each product used or applied,

(i) the brand name of each product,

(ii) the PCS number of each product,

(iii) the date or dates of application of each product,

(iv) the crop and area treated with each product,

(v) the quantity of each product applied (kilograms or litres),

(vi) rationale / reason for use; and
(c) for each product returned and for disposals,

(i) the name of the company to which returned or the name of the disposal company or organization,

(ii) the brand name of each product disposed of or returned,

(iii) the PCS number of each product disposed of or returned,

(iv) the date of return or disposal of each product,

(v) the quantity of each product disposed of or returned.

From the 1st January 2014 there is a requirement on all users of professional use plant protection products to maintain records to show that the principles of Integrated Pest Management are being implemented. A template for the required records can be found at http://www.pcs.agriculture.gov.ie/Docs/IPM%20and%20Pesticide%20application%20Record%20Sheets.pdf

Notwithstanding the requirements of paragraphs (2) and (3), end users of plant protection products intended for professional use, may on application made be exempted from some or all of the requirements specified in those paragraphs, where the Minister is satisfied that the quantities used are very small and the periods for which plant protection products are stored are very brief.
Definitions

Plant Protection Products (PPPs)

PPPs are products in the form in which they are supplied to the user, consisting of or containing active substances, safeners or synergists, and intended for one of the following uses:

(a) protecting plants or plant products against all harmful organisms or preventing the action of such organisms, unless the main purpose of these products is considered to be for reasons of hygiene rather than for the protection of plants or plant products;

(b) influencing the life processes of plants, such as substances influencing their growth, other than as a nutrient;

(c) preserving plant products, in so far as such substances or products are not subject to special Community provisions on preservatives;

(d) destroying undesired plants or parts of plants, except algae unless the products are applied on soil or water to protect plants;

(e) checking or preventing undesired growth of plants, except algae unless the products are applied on soil or water to protect plants.

These products are referred to as "plant protection products".

“Professional Use Plant Protection Product” or “For Professional Use only”

These terms when displayed on the label of a PPP mean that the product may only be used by a “professional user”.

“Professional User”

A “professional user” means any person who uses plant protection products in the course of their professional activities, including operators, technicians, employers and self-employed people, both in the farming and other sectors.