

In recent months, several new requirements driven by the introduction of the Sustainable Use Directive (SUD) have begun to impact on advisors, farmers and the retail trade. Among other things the SUD aims to i) reduce the use of pesticides (where practicable), ii) enhance the environment, iii) limit the exposure of the operator to potentially harmful chemicals, and iv) promote the use of 'integrated pest management'. These requirements are summarised below. Additional information and FAQs are available on the PCS website – see www.pcs.agriculture.gov.ie/SUD.htm [DO NOT WAIT TO BE INSPECTED BEFORE TAKING ACTION TO COMPLY].

Pesticide Advisors (PA)

The SUD requires that all pesticide advisors practising in Ireland are registered with the Department of Agriculture, Food and the Marine (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. As a PA you 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 chose to recognise alternative CPE systems in the future.

Note that as a registered PA, you are automatically considered to be qualified as a Professional User (PU).

Professional Pesticide Users (PU)

All farmers (and other professional end-users) applying professional use PPPs, will have to be registered with the DAFM by 26th November 2015. To register as a PU, you are required to be trained. DAFM recognises the following qualifications as acceptable for PU registration:

- FETAC 5N0732 – Handheld Sprayer.
- FETAC 5N1797 – Boom Sprayer.
- City & Guilds PA1 + PA2a – Boom Sprayer.
- City & Guilds PA1 + PA6 – Handheld Sprayer.

- DAFM registered Pesticide Advisor.
- Teagasc Pesticide Application course (as part of 1-yr or 2-year qualification).
- Teagasc Pesticide Application stand-alone short course.

A facility for registering is available on the DAFM website – see www.pcs.agriculture.gov.ie/SUD.htm. Proof of qualification(s) may be requested on registration. For those individuals in need of training, it is imperative that they only source courses from an **approved provider for that particular course** (e.g. FETAC or City & Guilds etc.). Also, PUs **must** be trained **specifically** for the particular type of application equipment they intend to operate, e.g. if you are using a boom sprayer, you must be trained for this specific use/operation, similarly if using a blast sprayer you must be trained for that purpose and so on. Be aware that if subject to a DAFM inspection (e.g. Cross Compliance etc.) you **will be required to provide proof of the qualification claimed.**

Since the start of the 2014, PUs are required to provide a name, address and herd number (or flock number) when purchasing a professional use Plant Protection Product (PPP). The retailer is also responsible for recording the batch number of the product sold, thus ensuring full traceability for all products sold and used on farms. Such a level of traceability is essential if ever there was to be a product recall because of contamination within the production/manufacturing process, or illegal/counterfeit product was found to be on the market in Ireland.

In addition to the requirement that all users of professional PPPs are trained and registered, the equipment used to apply these products must also be fit for purpose. From 26th Nov. 2016, all sprayers with a boom width greater than 3m, 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, and will carry out an agreed testing protocol, issuing a certificate of compliance on the successful completion of the test. The inspection interval must not exceed 5 years up to 2020, and thereafter must not exceed 3 years. A list of approved sprayer inspectors is available on the DAFM website, and will be further populated over the coming months as more inspectors complete training. Whilst the inspector is checking that the particular sprayer is ‘fit for purpose’ calibration remains the responsibility of the operator, and must be carried out at least once in every spraying season.

As mentioned previously, the SUD seeks to reduce the use of pesticides, whilst at the same time encouraging integrated pest management (IPM). This terminology may be new to some, but in practice it incorporates many of the techniques that most farmers would take for granted, e.g. cultural control measures such as ploughing to incorporate stubbles, using sticky traps to quantify pest populations etc. If you are subject to a Cross-Compliance Inspection in 2014, you will be asked if you are practicing IPM, and you will have to record a justification for the use of all products listed in the worksheet (see attached Table). Demonstrating compliance with IPM can be achieved by completing the IPM check sheet available on the PCS website.

Retailers

From 26th November 2015, all outlets selling PPPs (professional or amateur products) will have to be registered with the DAFM. Aside from the obvious agricultural businesses, this will also include hardware shops, garden centres and any other outlet stocking such products. After this date it will be illegal to sell such products unless the premises are registered. A facility for registering premises will be available in due course on the DAFM website – see www.pcs.agriculture.gov.ie/SUD.htm. For those businesses with multiple outlets, each 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 (and by the same date), it is also a requirement that each outlet will have 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. This course has been developed by IASIS (www.iasis.ie) and will be available towards the end of 2014. An online course for smaller businesses selling only PPPs for non-professional use will also become available in 2014.

More generally, since the start of 2014, it has been a requirement that full traceability is in place for all professional use PPPs bring placed on the market, so that all products can be traced from the wholesaler to the end user. Whilst farmers are required to maintain records for 3 years, retailers will have to maintain records for 5 years, and on inspection by the DAFM, may be asked to present such records.

Finally

Farmers are again reminded to take every available precaution to avoid pollution of water courses with respect to pesticide residues. In recent weeks residues of MCPA have been detected in a number of water courses, and whilst the concentrations of MCPA are not at significant levels, they give rise to concern. Where products are not being used in accordance with label recommendations, then the ultimate enforcement activity will be to fine or prosecute offenders, and or ban the use of products containing MCPA completely. See **Protecting Drinking Water from Pesticides** (www.pcs.agriculture.gov.ie/SUD.htm)

Product update

Table 1 lists products that are currently in use-up and should not be used after the date indicated.

Product Name	Company Name	PCS No.	Use-by date
Gamit 36 CS (Emergency Use)	FMC Chemical s.p.r.l.	05163	24-Jul-14
Dynamec (Emergency Use)	Syngenta UK Ltd	05172	30-Jul-14
Luna Privilege (Emergency Use)	Bayer CropScience Ltd	05173	30-Jul-14
Dancor WG	United Phosphorus Ltd	02543	01-Aug-14
Farmco Aphrodite	Farmco Agritrading Ltd	04416	21-Aug-14
Asulox (Emergency Use)	United Phosphorus Ltd	05199	28-Sep-14
Dithane Dry Flowable Newtec	Dow AgroSciences	00589	01-Oct-14
Met52	Novozymes Biologicals FR S.A	92397	01-Oct-14
Thistlex	Dow AgroSciences	02027	01-Oct-14

Table 2 lists products whose registrations expired or have been revoked during 2014. Products should be used as soon as possible and before their respective use-by date.

Product Name	PCS No	Function	Revocation date	Use-by date
Mystique	02367	Fungicide	28-Feb-14	31-Aug-15
Tanos	01398	Fungicide	28-Feb-14	31-Aug-15
Barclay Seismic WG	01327	Herbicide	01-Mar-14	01-Sep-15
Goltix Flowable	02333	Herbicide	01-Mar-14	01-Sep-15
Inca	03329	Fungicide	01-Mar-14	01-Sep-15
Foundation	00985	Herbicide	01-Apr-14	01-Oct-15
PP Captan 83	00164	Fungicide	01-Apr-14	01-Oct-15
Shotput	02782	Herbicide	01-Apr-14	01-Oct-15
Ceando	02717	Fungicide	17-Apr-14	17-Oct-15
Holster XL	03313	Herbicide	01-May-14	01-Nov-15
3C Chlormequat	90007	Growth Regulator	31-May-14	30-Nov-15
Ce Ce Ce 460	90382	Growth Regulator	31-May-14	30-Nov-15
New 5C Cycocel	90779	Growth Regulator	31-May-14	30-Nov-15
Farmco Aphicide Super	04930	Insecticide	25-Jun-14	25-Jun-14
Farmco Chlorothalonil	04806	Fungicide	25-Jun-14	25-Jun-14
Farmco Epoxy	04576	Fungicide	25-Jun-14	25-Jun-14
Farmco Iconic	04570	Fungicide	25-Jun-14	25-Jun-14
Farmco Syren	04691	Fungicide	25-Jun-14	25-Jun-14

Remember – Keep your pesticide worksheet updated and current

