

Keeping records

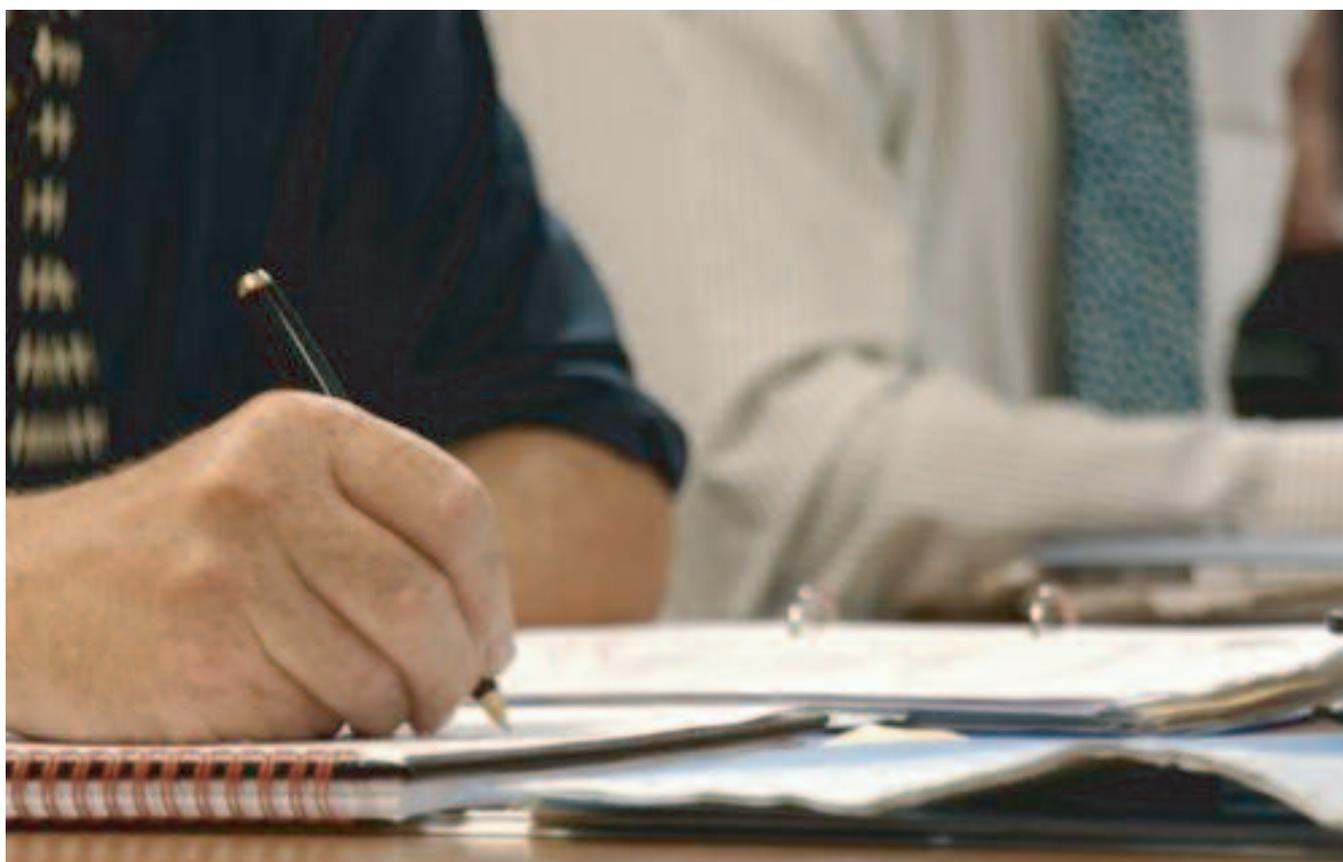
6.1 This part of the code provides guidance on the different types of records and explains exactly what you need to record and why. The table at the end of this part gives a summary of the records and the reasons for them.

6.2 Storage records

You do not have to, but you might find it helpful to keep records of all the contents of your chemical store (for both fixed and mobile stores). These records will:

- help with stock rotation and control;
- keep an accurate and up-to-date list of the contents of the chemical store if there is an emergency;
- help you avoid overstocking;
- help you to make sure that you do not have any unapproved or unwanted pesticide products; and
- help you to use up oldest stocks first to avoid deterioration.

It is best practice for you to keep a copy of the current stock list away from the store itself but where it is still easy to get to.



6.3 Records of pesticide treatments

By law, those who produce food and animal feed must keep records of pesticide treatments. There are two EC regulations which demand this:

- EC Regulation 852/2004 on the hygiene of foodstuffs (Annex I, part A, III (Record keeping)); and
- EC Regulation 183/2005 on the hygiene of feed for livestock (Annex I, part A, II (Record keeping)).

Both came into force on 1 January 2006. They explain that people who produce or harvest plant products for people or animals to eat must keep records of any plant protection products (pesticides) or biocides they use. Other people, such as vets, agronomists and farm technicians, can help you to keep these records.

Other professional users will need to keep records of applications in the future. You should keep these records now as part of good practice.

It has always been very good practice to keep records of all activities involving storing and using pesticides, not just those products applied as a spray. These records are useful to refer to if people, crops in the next field, other creatures or the environment are accidentally contaminated, or if someone claims that contamination has taken place.

Accurate records will also help you meet the terms of any pesticide conditions, such as:

- the time that needs to pass before harvesting;
- intervals between repeat applications;
- periods when livestock cannot go on a treated area; and
- periods when workers cannot enter treated areas.

PSD will publish more guidance on the format you should keep records in and how long you should keep them for. Make sure you can fill them in easily and without mistakes, and that they are understandable and can be read quickly.

Annex F gives a suggested format for a satisfactory treatment record for the time being. These records can be written by hand in a book or entered on a computer. It is better if you do not use loose pages in a binder because pages can be lost.

If you are a member of a crop assurance scheme or the woodland assurance standard, you will need to meet specific conditions for making and keeping treatment records. You also need to keep certain records for LERAPs.

It is good practice to record treatments made to areas close to homes or other properties which a lot of people occupy (such as schools, residential homes, hospitals and so on). You may want to record the date and time, name the pesticide used (including the MAPP number), refer to any environmental or COSHH assessment made, refer to any notice given to the area or signs set up (including when they were put up and taken down) and so on. You may also want to keep a record of any questions you receive from your neighbours.

If someone suggests that they may have been affected by a pesticide, it is important to give them, their advisers or the HSE full and accurate information as soon as possible (including the full name of the product with its MAPP number, any other information such as risk and safety phrases and medical information). This information will normally be shown on the product label.

It is best if you make sure you keep your records to hand in your farm or local office. Information is then easy to get to and not just kept by suppliers, contractors or advisers. When you use a contractor, they should make and keep records on applying the pesticide and, as the owner or occupier of the treated land or local treatment manager for the local authority or other treated area, you should ask the contractor for a copy of these records.

It is also a good practice to assess and record the effectiveness of each pesticide treatment after a suitable time has passed. This information is important in identifying problems with:

- how the pesticide has been applied;
- crop damage (possibly only affecting certain varieties); or
- any resistance pests are building up.

These records can help you to:

- improve application methods and product choice;
- share information with pesticide and equipment manufacturers; and
- supply information to PSD as appropriate.

You can find information on pesticide resistance and the work of the various resistance action groups on the PSD website (www.pesticides.gov.uk).

6.4 COSHH assessment records

A record of a COSHH assessment, when one is needed, should include:

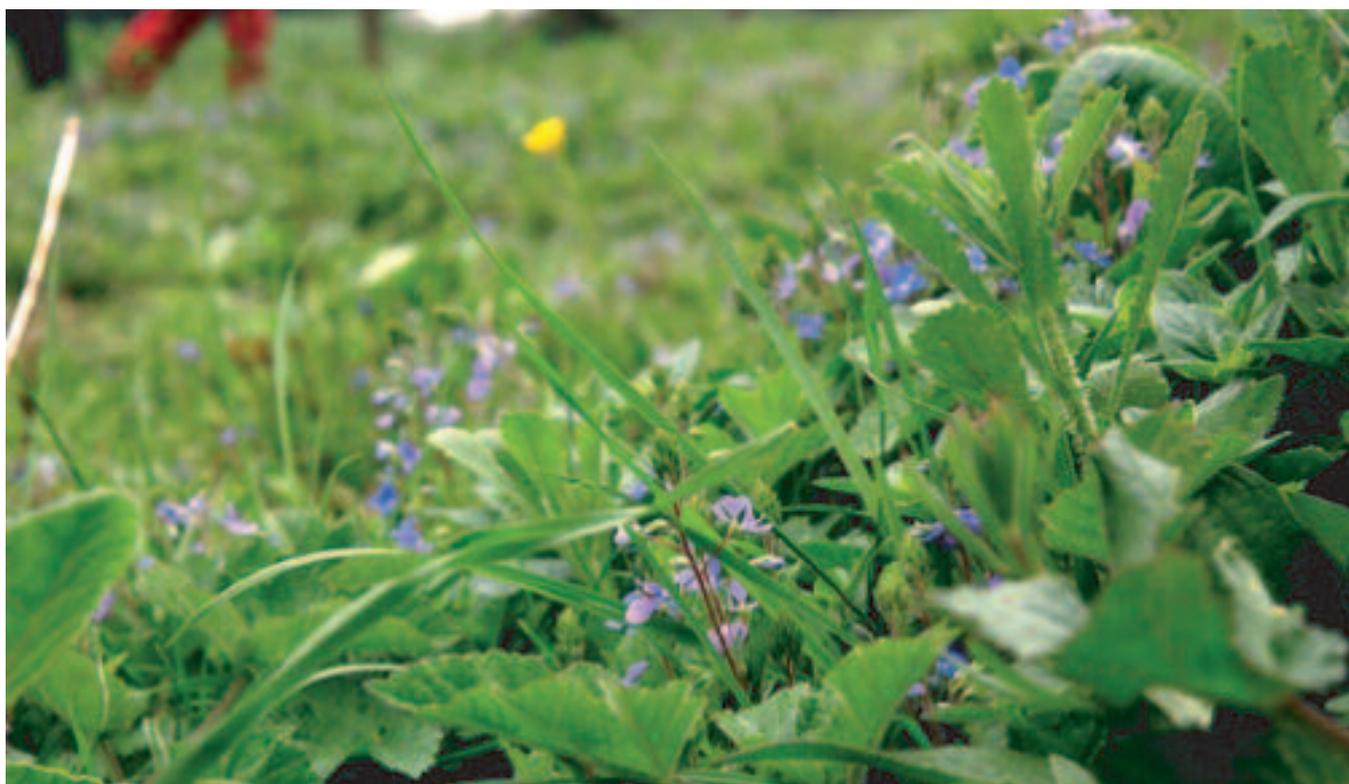
- the full name of the pesticide (and the relevant HSE or MAPP number);
- the possible risks to health which may result from pesticide being used;
- the steps which you need to take to prevent, or adequately control, exposure in line with COSHH; and
- the other action necessary to meet the obligations of COSHH for example:
 - using and maintaining measures which control exposure;
 - monitoring exposure;
 - health surveillance; and
 - training and instructing those who use pesticides.

You must keep COSHH assessment records readily available.

6.5 Records of environmental risk assessments

A record of any environmental risk assessment should include:

- the name of, and a description of, the pesticide (as for a COSHH assessment record);
- the possible risks to wildlife and the environment which may result from using the pesticide;
- the steps you need to take to prevent, or adequately control, exposure of wildlife and the environment;
- the specific details needed when you apply a pesticide in line with the LERAP schemes, and any other information which may be relevant when you use pesticides in certain situations (for example, when using a pesticide in or near water); and
- details of any nearby springs, wells or boreholes or groundwater source protection zones within the treated area, and the action you need to take to prevent contamination of groundwater.



6.6 Records of monitoring exposure

In situations where your employer needs to monitor exposure to pesticides, the monitoring records should provide adequate information on:

- when your employer carried out the monitoring and what the results were;
- what monitoring procedures were used and how long the monitoring periods were; and
- the type of samples which were taken, where the samples were taken from, the work in progress at the time and, in the case of samples taken from people, the names of the people being monitored.

6.7 Maintenance records of exposure control measures

Under the COSHH regulations, employers and self-employed people must keep suitable records of inspections and tests of engineering controls and respiratory protective equipment (RPE). A suitable record of each inspection and test of RPE will include:

- the name and address of the employer responsible for the RPE;
- details of the equipment including any distinguishing number or mark, together with a description that is adequate to identify it, and the name of the maker;
- the date of the inspection or test and the name and signature (or unique authentication) of the person who carried it out;
- the condition of the equipment and details of any faults found including, in the case of canister or filter respirators, the condition of the canister and filter;
- details of any repairs carried out as a result of the inspection or test;
- in the case of compressed-air or oxygen apparatus, the pressure of the air or oxygen in the supply cylinder; and
- in the case of airline-fed apparatus (except half-mask respirators used occasionally against dusts or fumes of relatively low toxicity), the flow volume and quality of the supplied air. If the air supply is from a mobile compressor, you should carry out this test immediately before using it for the first time in any new location.

In the case of airline-fed half-mask respirators used occasionally against dusts or fumes of relatively low toxicity, employers and self-employed people will just need to record:

- the responsible employer's name and address;
- the date of the inspection or test and the name and signature (or unique authentication) of the person who carried it out; and
- the condition of the equipment and details of any faults found.

You must make sure it is clear which item of RPE the record relates to.

6.8 Health surveillance records

In situations where your employer needs a formal procedure to assess the health of pesticide users, the records should include the following details for every employee using pesticides.

- Their full name, sex, date of birth, permanent address and postcode, National Insurance number, the date their current employment started and a record of any previous jobs where they were exposed to substances health surveillance is needed for.
- The results of all other health surveillance procedures, the dates when they were carried out, and details of who was responsible for each surveillance programme. You should interpret these results in terms of an employee's fitness for their work and include, where appropriate, a record of the medical adviser's or doctor's decisions, or the conclusions of the medical practitioner, occupational health nurse or other suitably qualified or responsible person. You should not include confidential clinical information.
- If health surveillance involves only keeping an individual health record, you should record the details listed in the first bullet point above.
- As well as these detailed records, you should also keep an index or list of the names of people who are undergoing, or have undergone, health surveillance.

Employers should make sure they keep records for the appropriate length of time (see the following table) and that they can be referred to easily. This is particularly important if there are significant changes in the business (such as a change of ownership or change of business activities). In the case of health surveillance records, if a business stops trading, the employer should offer these records to the HSE.

6.9 Disposal records

If you are moving or disposing of waste, you must keep a copy of each 'waste transfer note' (and a written description of the waste) for at least two years. For hazardous waste, you must keep a copy of each 'consignment note' for at least three years.

Table 7: Summary of records to be kept

Type of record	Time kept for	Reason for records
Pesticide store records	Until updated	<ul style="list-style-type: none"> To give an accurate list of the contents of your chemical store in an emergency. To help you with stock control.
Pesticide treatments	To be decided	<ul style="list-style-type: none"> To show that you have used pesticides appropriately, safely and legally. By law, food and feed producers must keep these records. At present it is good practice for all other professional users to keep records, but this will be law in the future. To help with good management. To provide other people with important information, especially in emergencies when people, animals or the environment have accidentally been contaminated, or crops have been damaged. To help you keep track of periods when crops cannot be harvested and people or animals cannot enter a treated area. To meet the specific conditions of crop assurance schemes or the woodland assurance standard.
LERAPs	Three years	<ul style="list-style-type: none"> To show that you have met the conditions of the LERAP schemes. To show that you have met the conditions of agri-environment or stewardship schemes. To allow you to assess the effectiveness of a particular pesticide. To meet the specific conditions of crop assurance schemes or the woodland assurance standard.
COSHH assessment and environmental risk assessment	Until revised	<ul style="list-style-type: none"> To show that you have adequately assessed all risks to people and the environment. To provide evidence that you have met your legal obligations to protect people and the environment. To confirm that you have the appropriate certificates or permission (for example, authorisations under the Groundwater Regulations).
Maintenance, inspection and testing of measures to control exposure	Five years	<ul style="list-style-type: none"> To confirm that measures to control exposure are working effectively. To show that employers have met their legal duty to maintain, inspect and test engineering controls and respiratory protective equipment.

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Table 7: Summary of records to be kept (*continued*)

Type of record	Time kept for	Reason for records
Monitoring exposure in the workplace (general samples from the workplace)	Five years	<ul style="list-style-type: none"> • To confirm that the level of exposure at work is acceptable. • To show that employers have achieved and maintained adequate control of exposure to dangerous substances.
Monitoring exposure of individual, identifiable people	Forty years	
Health surveillance	Forty years	<ul style="list-style-type: none"> • To identify any negative health effects resulting from exposure to dangerous substances at work. • To show that employers have met any legal conditions to carry out health surveillance of their employees.
Disposal records	Two or three years	<ul style="list-style-type: none"> • To show that waste has been handled and disposed of safely and legally.