

PrimusGFS v3.0 Questions & Expectations

TABLE 3: PESTICIDE USAGE

This pesticide usage section should be completed for each of the farm and indoor agriculture operations.

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PESTICIDE USAGE			
Question No.	Question	Total Points	Expectation
2.10.01/ 3.11.01	Are there up-to-date records of all pesticides applied during the growing cycle? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	15	The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, EPA (or equivalent) registration information , active ingredient, amount applied (rate/dosage), applicator name, pre-harvest interval, restricted entry interval , type of equipment used and target pests .
2.10.02/ 3.11.02	Do records show that pesticides and their use are in compliance with all requirements of label direction, national (e.g., EPA) registration and any federal, state or local regulations and guidelines? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	All pesticides must be registered for such use, as required by prevailing regulation, and used in accordance with label directions, including application rates, worker protection standards, personal protection equipment, container storage and disposal. N/A is allowed only when registration/authorization information does not exist for pesticides to be used on target crops in the country of production.
2.10.03/ 3.11.03	Where products are destined for export, do records show that only pesticides approved for use in destination market(s) are used and are in compliance with all requirements of label direction, national (e.g., EPA) registration and any federal, state or local regulations and guidelines? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	All pesticides must be registered for such use in the destination market, as required by prevailing regulation, and used in accordance with label directions, including application rates, worker protection standards, personal protection equipment, container storage and disposal. The grower should provide documented evidence that they are complying with the expectations regarding crop protection products of the country of origin and proof of what those expectations are. That evidence may be in the form of: chemical records, application methods, rates and dosage, compliance with pre-harvest intervals, compliance with MRL tolerances or any other relevant information. This question is Not Applicable if the product is sold only in the country of production (domestic market). If this question is answered No, automatic failure of this audit will result.
2.10.04 3.11.04	For those pesticides that are registered and/or authorized by a government agency for use on the target crops in the country of production or are not registered for use on the target crops in the country of production, if the country does not have or has a partial legislative framework to cover pesticides, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Grower should be aware of the crop protection products registered and/or authorized by a government agency for use in the target crops in the country of production. Where the country of production does not have or has partial legislation covering pesticides, and if the use of pesticides that are registered for the target crop in another country (extrapolation) is not prohibited, the grower must have information for the pesticides in the country(ies) of destination. The information must show: registration for the specific crop, product labels, Maximum Residue Limit (MRL) tolerances and may also include banned chemical lists, and any other relevant guidelines or legislation. If there is no information available for pesticides used that are not registered in the country of production, or its use based on registration, label and other legislation of the destination country, extrapolation is prohibited by the country of production, and an automatic failure will be scored.

PESTICIDE USAGE (CONTINUED)			
Question No.	Question	Total Points	Expectation
2.10.05/ 3.11.05	Where products are destined for export, are there records showing that pre-harvest intervals and application rates are sufficient to meet MRL entry requirements of the country of export? Records show any non-compliant product is diverted to a market where it meets requirements. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	There are records showing that pre-harvest intervals and application rates are sufficient to meet MRL entry requirements for the country of export. Records show that any non-compliant product is diverted to a market where it meets their requirements. Any records of pesticide chemical residue testing results show residues on products do not exceed the published Maximum Residue Limits (MRL) in the destination market(s) and if so, corrective actions have been taken and documented.
2.10.06/ 3.11.06	Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines being adhered to? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Application and harvest records show pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines are being adhered to. If this is not followed, an automatic failure will be scored.
2.10.07/ 3.11.07	Is there a documented procedure for the mixing/loading of pesticides?	5	There should be a documented procedure describing how to mix and load pesticides. The procedure should adhere to the product label and include: requiring activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated.
2.10.08/ 3.11.08	Is there a documented procedure for the application of pesticides?	5	There should be a documented procedure for the application of pesticides. The procedure should adhere to the product label and should include the use of Personal Protective Equipment, re-entry Intervals, posting of treated area, etc.
2.10.09/ 3.11.09	Is there a documented procedure for the rinsing and cleaning of pesticide equipment?	5	There should be a documented procedure describing how to rinse and clean pesticide equipment. Pesticide equipment includes measuring containers, mixing containers, application equipment and rinseable pesticide containers. The procedure should adhere to the product label, to country, federal, state or local laws and regulations, and should include: rinsing empty equipment immediately to prevent residues from drying and becoming difficult to remove, and adding a rinsate (water from rinsing containers or equipment) to spray tanks as part of the pesticide mixing process.
2.10.10/ 3.11.10	Is there documentation that shows the individual(s) making decisions for pesticide applications are competent?	15	Current valid certificates, licenses, another form of proof of training recognized by prevailing national/local standards and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.).

PESTICIDE USAGE (CONTINUED)			
Question No.	Question	Total Points	Expectation
2.10.11/ 3.11.11	Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?	15	Current valid certificates, licenses, or another form of proof of training recognized by prevailing national/local standards and guidelines should be available for supervisors/workers handling, mixing/loading/and applying pesticide materials.
2.10.12/ 3.11.12	Are pesticides stored without risk of contamination, in a locked, dedicated area with legible labels, and are empty pesticide containers held and disposed of according to their label and/or regulatory instructions?	10	Pesticide containers should be stored securely: away from other materials, locked, signs posted, away from water source, off floor, well-ventilated, and inventory kept. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly. If containers cannot be refilled, reconditioned, recycled or returned to the manufacturer, they should be crushed, broken or punctured to make them unusable. Containers should be disposed of in accordance with label directions and with federal and state or local laws and regulations. Pesticide containers designed to be returned and refilled should not be reused or tampered with.
2.10.13/ 3.11.13	Is it evident that the equipment used for pesticide applications is in good working order?	10	All equipment used in pesticide applications should be in good working order so that correct applications can be made, thus reducing potential crop contamination or drift issues.
2.10.14/ 3.11.14	Are restricted entry interval (REI) signs posted in the area(s) where pesticide applications occur?	10	All agricultural pesticide labeling provides a specific REI. Some regulations provide REIs for certain pesticide/crop combinations. Whenever there is a labeling REI and a regulatory REI for an application, the longer REI must be followed. Warning signs should be posted before an application when required by the pesticide label, regulations or restricted material permit. All indoor applications require warning signs.