

Top 10 Record Keeping Tips to help you meet your legal requirements

Here are Agriculture Victoria's top 10 tips to assist you to meet the record-keeping requirements of the Agricultural and Veterinary Chemicals (Control of Use) Regulations 2017.

1. RECORD-KEEPING FORMAT

Agriculture Victoria does not stipulate the way in which you must make and keep your chemical use records.

Sample record-keeping templates are available from the Agriculture Victoria website which will address all the legal aspects of chemical use records. These can be found at <http://agriculture.vic.gov.au/chemical-application>

It is your decision as to how you keep your records and ensure details are recorded in such a manner that they can be provided to Agriculture Victoria on request. If your records are supported by other documents (i.e., maps, legends or client databases) you need to ensure you provide all the information when asked, otherwise you may not be meeting your obligations.

2. RECORD APVMA APPROVAL NUMBERS

The legal requirement is to record the 'Full Product Trade Name' of the product used. This can be difficult to identify from the product label or may be a long name or many words. Every registered product is assigned an Australian Pesticides and Veterinary Medicines Authority (APVMA) Approval Number during its registration. This five-digit number, found on the product label, uniquely identifies that specific product. Recording this number and the trade name allows officers to identify the exact product that was used and meets the record-keeping requirement.

3. THE ACTUAL DATE OF USE

Many people are keeping their agronomist's recommendations and using these as their chemical use records. There is no problem with this if additional information, such as the actual date of use, is captured on the recommendation after the chemical use has occurred. Recommendations usually only capture the date they were issued by the agronomist and possibly a due date. This also applies to spray applications which may have been completed over several days.

For recommendations and work requests to meet the legal requirements, other information also needs to be noted on them. This includes wind speed and direction at the time, place of application, and name and contact details of the applicator.

4. RECORD APPLICATION RATE AS PER THE PRODUCT LABEL

It is best practice to record the application rate in the same terms as it is expressed on the product label. This is often the quantity of chemical used per 100 L of water or per hectares (i.e., 50 ml/100 L or 50 ml/ha). Other formats are acceptable such as recording the amount of chemical used per vat, as the amount of water in the vat is also recorded so that the rate can be calculated.

5. CROP / COMMODITY / SITUATION

The crop, commodity and situation must be recorded for all chemical use, including spot spraying. The Directions for Use table on the product label will give you guidance as to what Crop, Commodity or Situation you are applying the chemical on/in. Crops or commodities on product labels may be recorded as groups (i.e., 'citrus' or 'grain'), while common situations include 'fence lines', 'tree-line spraying' and 'spot-spraying' of a particular weed.

This record is particularly important when you are using 'Restricted Use' products to demonstrate the product was used in strict accordance with the label directions for the specific crop/situation/weed/rate combination.

6. SPECIFIC LOCATION

The location of where the chemical product was used needs to be identifiable from your records. You may record a block or paddock name, or reference which can be identified on a farm map, the address of the shed where post-harvest applications were applied, or names of roads where spot spraying was conducted. The way you record location is up to you, but it must be clear and make sense to a person who is not familiar with the property or area.

7. WIND CONDITIONS

You must record wind speed and direction every time you conduct spraying in an outdoor situation. These details should be recorded in kilometres per hour with an indication of where the wind was coming from or to (i.e., "5km/h from N") – not a compass reference. These details are particularly important as they are major factors in managing the risks of chemical drift.

Records of wind details are not required for 'cut and paint' applications, as they are not considered 'spraying'. However, use of chemicals via a knapsack or hand reel are viewed as 'spraying' and wind details must be recorded.

If spraying takes place over several hours and these weather conditions change, ensure you capture this in your records. It is good practice to assess and measure weather conditions at minimum every time you re-fill the vat or tank.

If you stop spraying part way through a job because the conditions become unsuitable, you should also record this as this demonstrates responsible chemical use.

The best way to measure these conditions is using an on-farm monitoring tool. This might be a hand-held device, or a weather station set up on your property. Online weather monitoring tools can take measurements at locations which are a significant distance from where you are spraying and are not an accurate record of the conditions at the time and location of your spraying.

8. NAMES AND CONTACT DETAILS

The full name and address of the person who applied the chemical needs to be available, and identifiable, from the chemical use records. This requirement can be met in a number of ways. Signatures are not acceptable as they do not clearly identify a person. Chemical users could initial each application record and link this to the user's full name and address held elsewhere (such as in the front of the record book). If there is only one chemical user, writing a declaration stating this on each page is acceptable. If using agronomist recommendations as chemical use records, details of the actual chemical user will need to be added after the work has been completed.

This also applies to any supervisor details, where applicable.

If you are conducting spraying on someone else's crops or property (i.e., acting as a contractor), you will need to also record the name and address of your client. This requirement could be met by recording the client's name in the entry, with their contact details available elsewhere, such as on an invoice or in a client database.

9. ADDITIONAL RECORD KEEPING REQUIREMENTS

You may also be required or even choose yourself to keep additional chemical use records. Some of these records might be required to be kept due to a product label statement or a condition of an APVMA permit, such as those relating to spray drift e.g., time, application rate, climate (relative humidity and temperature) and equipment setup details. They may also be required by a food safety system that you accredited under to supply your produce, or even by other government authorities.

In relation to additional spray drift record keeping requirements on a product label the most complex area of record keeping relates to the equipment setup details. It is a requirement to record the nozzle brand, model, size, type, boom height at release and system pressure. If you are using more than one equipment setup, you could record the details for each one and then for each chemical use record simply refer to which setup was used. Keep in mind, if you deviate from these standard 'set ups' you will need to record the specific details in the chemical use entry.

10. USE RECORDS FOR YOUR OWN BENEFIT

Chemical use records are much more than just a legal requirement. Chemical use records have many benefits for the chemical user, including identifying chemical use patterns, analysing the effectiveness of chemicals, assisting in decision making around integrated pest management programs, assessing chemical resistance, conducting financial planning and budgeting, meeting market access requirements and demonstrating due diligence.

ACCESSIBILITY

If you would like to receive this publication in an accessible format, please telephone Agriculture Victoria on 1300 502 656.

This document is also available in PDF format at www.agriculture.vic.gov.au/chemicals
