PESTICIDES are an important management tool for greenkeepers, their use is now taken for granted and is an integral part of the management of the modern golf course. However, two recent pieces of legislation have had and will continue to have a significant effect on the use of pesticides on the golf course. An understanding of the requirements of the Food and Environment Protection Act 1985, especially the Control of Pesticide Regulations 1986 and The Control of Substances Hazardous to Health (COSHH) is an essential requirement for any professional greenkeeper. For those still unfamiliar with the requirements of the Control of Pesticide Regulations 1986, a very useful guide is "The Plain Mains Guide to the Pesticide Regulations" which is available free from the British Agrochemicals Association at 4 Lincoln Court, Lincoln Road, Peterborough PE1 2RP. The same organisation have recently published a similar guide called "The COSHH Assessment - A Plain Mans Guide for the Amenity User".

FEPA AND THE GREENKEEPER
Within the law there is a general obligation for all pesticide users to "take all reasonable precautions to protect the health of human beings, creatures and plants, to safeguard the environment...". Pesticide users should be aware that the manufacturer's label has legal status and there is an obligation on all users to follow the label recommendations. The single most important piece of advice that a manufacturer can give to a user is READ, UNDERSTAND AND FOLLOW THE LABEL RECOMMENDATIONS. If there is any doubt about the label recommendations discuss this with your supplier or the manufacturer.

A large number of users require a Certificate of Competence: contractors (a term which also applies to an operator offering a "free" service or doing a favour), all users born after 31st December 1964 (NB any trainee or apprentice greenkeepers), and anyone supervising uncertified users in these preceding categories.

A user requiring "certification" does not have to attend any training course before attending an examination. However, to be confident of success the user should attend a recognised training course. These courses can be arranged with the Agricultural Training Board, local agricultural colleges, other independent organisations or by experienced "in-house" staff (who ideally will have attended ATB instructor and trainee course).

NPTC syllabus, which now encompasses the new COSHH regulations, is divided up into a modular format. Each candidate has to sit the Foundation Module before he can proceed to the pesticide application modules. The Foundation Module encompasses the safety aspects of pesticide legislation, mixing of concentrated protective clothing, and most importantly the reading and understanding of the manufacturers label.

Other areas covered in the foundation module are as follows: keeping records, disposal of unwanted pesticides and washings, dealing with contamination, environmental factors, storage of pesticides. Having passed the Foundation module the candidate can then proceed to the application modules which qualify the user for a range of different methods of application. The application modules range from Ground Crop Sprayer to seed treating equipment to Hand Held Applications granules. There are up to 21 different application modules. Some of the modules will cover the user for other modules simultaneously, similar in principle to the driver categories covered by a driving licence.

The normal training format will be:

1. Training for Foundation Modules, 1 day, cost £25-£35/head.
2. Test on Foundation Modules, up to 2 hours, cost £25-£30/head.
3. Training on Application Module 1½ day, cost £35-£50/head.
4. Test on Application Module, 2 hours-½ day, cost £25-£35/head.

Cost and timings are approximate. NPTC charges vary from county to county.

Obviously training a spray operative is expensive. A fully certified operator who has attended training courses will cost his employer from £105 to £180 in tuition and examination fees, not including lost work time.

COSHH AND THE GREENKEEPER
The responsibility of the greenkeeper under COSHH is somewhat less clear as the overall responsibility for compliance will lie with the management of the golf club. However, there are a number of actions which the greenkeeper can take to help:

1. Inform the management of any hazardous products which are used, e.g. any products which carry the orange hazard signs signifying "TOXIC", "HARMFUL", "CORROSIVE" or "IRRITANT". Where possible provide labels for these products and acquire Product Safety Datasheets from the supplier or manufacturer.
2. Assess whether it is essential to use these products or whether "safer" formulations and packaging can be purchased.
3. Review the situation in which these products are used. Can better safety equipment be provided, e.g. a mixing bowl for a mounted sprayer?
4. Whichever pesticide/greenkeeping practices have been identified staff should be informed and trained in their correct use and maintenance.

If further help and assistance is required then the local branch of the Health & Safety Executive should be consulted. The HSE would rather advise than prosecute.

Training for FEPA may seem a large investment that was not necessary in the past. However, the law allows for fines of up to £2000 for failure to comply with the legislation and this will be one incentive to get trained. The real benefit however of a training course is that it will pay dividends in terms of both safety and the efficiency of pesticide use. Greater accuracy in application, better calibration, and more care in the choice of pesticide will all result in improved pesticide efficacy and thus justify the extra costs in the long term. Understanding and enforcing the requirements of COSHH will ensure that the golf course remains a healthy and safe working environment for the greenkeeper. Thus, in many ways, the changes to the legislation will in fact be of benefit to the greenkeeper rather than a nuisance.

EVERYONE involved with pesticides should make every effort to ensure that they are "competent for the duties for which they are called upon to perform". It is the duty of both employer and employee to ensure that adequate training and instruction is available and is used, even if a certificate of competence is not required. Pesticides are an important management tool for greenkeepers, skill and safety in using them must be an important feature for the successful care and maintenance of turf, together with healthy vegetation.

PATRICK GOLDSWORTHY
Technical Services Manager
ICI Agrochemicals, Professional