

# Environmental health officers: 'armed' and ready for crackdowns



by JON ALLBUTT

**F**rom April this year the responsibility for enforcing the Pesticides Regulations passed to the environmental health officer for the local authority.

Environmental health officers (EHOs) have just completed the excellent Open Learning Course for FEPA (available from HMSO, price £16) and are now 'armed' and ready to do battle! This new responsibility is added to their other duties to enforce the Health and Safety at Work Act; The COSHH Regulations and of course the Environmental Health (Food Hygiene) Regulations. Your local inspector is now able to take a broad look at the workplace with his enforcer's eye; so what will he be looking for with his FEPA/pesticides hat on?

The inspection is going to be 'by the book' as most EHOs will not have much experience of the use of pesticides on the golf course. They are likely to take a more severe view of even small points than the HSE Agriculture Inspector and have powers to issue Improvement Notices giving a number of days (usually 30) to carry out the improvements or else!

Because the Regulations place a duty upon the employer to protect staff and the environment from any hazards arising out of the application of pesticides, it would be wise for the employer to have a formally written policy setting out the club's position. The inspector on reading this will be in no doubt that the club accepts its responsibilities and has taken steps to meet them. The policy will set out how the club intends to meet the main requirements of the Regulations, these being set out in the Code of Practice for the use of Approved Pesticides (copies from David Golding at BIGGA HQ, for £12 inc. p+p).

The inspector will want to see details of the training and certification of staff, which should include office copies of the certificates and details of the training carried out. If the training and testing was carried out more than three years ago, there should be details of revision courses carried out or proposed. Just having certificates is not enough: staff must be kept up to date on the many changes that are taking place in product labelling, application techniques, etc.

The storage of pesticides is important. The inspector will want to see the store, the inventory, spill clean-up procedures, empty container storage and disposal arrangements. There are changes in approvals for some pesticides: some are being withdrawn (simazine and atrazine 1992/3), others are being discontinued. Make sure that all the products in store are up to date and approved.

The pesticides applicators will be inspected and the inspector will look at the general condition of the sprayers: are they clean; do they look clean; are there any worn or chafed hoses, is there a clean water tank for rinsing of containers and operators to

wash after mixing a batch of pesticide out on the course.

The pesticide application records are important too. The Code of Practice has a suggested format for a record of pesticides application. The records must be kept for at least three years and may be important for health monitoring if staff have been using organ-phosphorous or carbamate chemicals.

The issuing and use of personal protective equipment (PPE) will also be looked at. The new PPE Regulations (to be published shortly) will form a part of inspection. The first question to be answered is whether the PPE is 'suitable for the purpose'. Are there data sheets showing the equipment has been tested and is suitable for protection against the pesticides in use. Is the equipment clean, in good condition and stored separately from other clothing where it can dry? If respirators (RPE) are in use, they must have the correct filter fitted, they must be stored in a sealed bag and be in a clean condition. Many respirators are supplied with dust filters as standard, so when buying respirators it is wise to tell the supplier what they will be used for and make sure they are supplied with data sheets showing that they are suitable.

If a club has made a good start by implementing a policy, has good storage arrangements, has trained staff and good equipment and is keeping good records, the inspector will be much less likely to go into print on what improvements he requires. But if no effort has been made then beware, the inspector will not be amused and may well add a lot of improvement items under health and safety legislation as well.

