

July 2014

## Combinable Crops & Sugar Beet



# What Has Changed

Red Tractor has completed a review of the Farm Standards. Our objective is to have up-to-date standards which cover key reputational risks and are of benefit to you. We have spent time getting the balance right to ensure our standards meet the requirements of your customers as well as being practical and achievable to deliver on-farm.

We have made some improvements to the standards format and a few changes will come into force on **1st October 2014**. Each standard change is marked 'new', 'revised' or 'upgraded' in the manual. You will find them summarised here to explain what we have changed and why. You will find a useful self-assessment checklist on the back page.



### Point of First Tip Record and Samples

Food chain traceability is a vital cornerstone of Red Tractor including when the grain leaves the farm. You need to keep records of the destination or point of first tip for all loads leaving the farm (TI.a.2). It doesn't need to be a formal record, simply keeping a diary note or copies of haulage tickets will be enough.

It is good practice to take a sample from each load leaving the farm so we are recommending that you do this and keep them for 3 months (TI.a.3). This will help should there be any disputes about loads at a later date.

"Many of our customers have different contaminant limits for grain and the energy market needs specific sustainability criteria to be met," said Mike Hamby, NFU Combinable Crops

Chairman. "If farmers are to play our part avoiding incidents further down the supply chain we need to know where each load is going in order to ensure we meet its specific needs."

Clear identification of grain in-store to ensure on-farm traceability is essential. To help with this you need to take representative samples from each storage bin, silo, flat store and drying floor at the time of filling (TI.b).

TI.a.2 & TI.b were both recommendations previously.

### CIPC Store Risk Assessment

CIPC is used by potato growers on crops destined for longer-term storage. It is applied during storage and can contaminate the store; concrete, floors, walls and roof. It cannot be completely removed even with extensive cleaning and can persist for years.

The danger is that it can migrate out of these surfaces into other crops if they are subsequently stored in the same building, leaving illegal CIPC residues in crops. If it is a seed crop it can also ruin germination.

Store risk assessments are vital to ensure the store is in an acceptable condition for its intended use. You now need to carry out a CIPC Store Risk Assessment for all temporary and long-term storage. If you have not done this before we have provided a template on page 23 of the manual. (ST.h)

## Temporary Stores - New Deadline

Currently temporary stores can only be used until the 30th September or 4 weeks after harvest. This is confusing so has been amended to simply allow temporary stores to be used until 31st October and no later. (ST.p)

In certain years, where harvest is later than usual, a derogation may be provided which will be published on [www.redtractorassurance.org.uk](http://www.redtractorassurance.org.uk)

## New Land, Storage or Facilities

Before taking on new sites, grain storage facilities or land it is normal practice and now a standard to check them and consider the previous use of the land. This does not need to be documented. Don't forget to tell your Certification Body when you take on any new storage facilities. (DP.d)

## Mycotoxin Risk Assessment

The need for mycotoxin risk assessments has been made clearer; requiring that they are carried out for the current growing season and for each field of wheat. It is also now a full requirement that there is no shooting of clay pigeons over standing crops of rape after the yellow bud stage. (RC.b)

## Own Transport Off-Farm

You take great care to minimise the risk of contamination of your crop whilst it is on-farm and would be extremely disappointed if a problem then arose during transport off-farm. For this reason we have standards covering transport, some of which have changed.

**Sheeting of vehicles and trailers** – All bulk-tipping vehicles and trailers must be sheeted during delivery off-farm. (OT.h) (Upgraded from a recommendation)

**Cleanliness of vehicles and trailers** - Rather than refer to an external list (the TASC Haulage Sensitive List), now all vehicles, trailers or sheets which have previously carried anything other than combinable crops must be thoroughly cleaned, power washed and sanitised with a combined food grade detergent/ disinfectant before they are used for any off-farm deliveries. (OT.d)

**TASC Haulage Exclusion List** - This has been amended by AIC so we have included the revised version as an Appendix (OT.e). Vehicles, trailers or sheets previously used to carry material that is on this list cannot be used to carry combinable crops.

## Staff

Having competent people, who understand what to do is crucial to your business. The standards related to staff look quite different, but are good business practice, are practical and not onerous. The term staff applies to full and part time staff as well as family members. The key changes are:

- Any new staff need to be introduced to the farm and their tasks explained to them. You don't need to document this. (SC.a)
- If you use a Labour Provider to provide long-term, short-term or even regular staff (e.g. holiday-cover, harvest staff), you must protect your business by getting written confirmation that they are providing you with competent staff and that they have a Gangmasters Licence. (SC.d)

## Controlling Vermin

Following incidents of birds of prey being found with secondary poisoning by rodenticides there has been increasing pressure on the wider agricultural industry to prove responsible use of rodenticides. Our crops standards have always placed great importance on vermin control which we know you will agree is vital from a quality as well as food safety perspective. So you already keep a bait plan and use bait responsibly in a manner to avoid non-target species.

The standards focus more clearly on the Campaign for Responsible Rodenticide Use (CRRU) code. You will find the standard (VC.b) has been refreshed so it explains clearly what you need to do. In addition to your existing bait plan which includes a map/ location of all bait points you also need to record the **bait laid down, bait point inspection dates and bait replenishment dates**.

On a similar topic, if you use rodent traps you must now keep a record of trap checks to demonstrate there is an effective rodent control system in place. (VC.a)



## Fertiliser Storage

You are required by law to notify the relevant authorities if you are storing certain amounts and/or types of fertiliser. Our standards have been updated to reflect this legislation and details of the trigger points are outlined in the Manual. (EC.k.3)

# Environmental Standards

Last summer, regulations came into effect which implemented the Sustainable Use Directive (SUD) in the UK. If you are using any Plant Protection Products (PPPs) such as pesticides, herbicides, fungicides, molluscicides or insecticides, PGRs or soil sterilants then the SUD will apply to you.

A number of the standards have been updated to include these legal requirements (some of which come into effective in 2015 and 2016).

## Certificates of Sprayer Competence

The SUD has removed Grandfather Rights for sprayer operators and requires that from 26th November 2015 all sprayer operators hold a valid certificate. To highlight this to you we have introduced a new recommendation that sprayer operators obtain the relevant certification which should allow plenty of time to gain the qualification before the law is effective. (EC.g.1)

## Sprayer Testing

The SUD requires that all PPP application equipment is NSTS tested from the 26th November 2016. There is no immediate change to the standard i.e. manufacturers' or NSTS certificates are still both permitted. However to highlight this to you and to help you prepare, the standard has been reworded to reflect the fact that from 26th November 2016 only NSTS certificates will be acceptable. (EC.i)

## Feed Hygiene Regulation Registration

Some Local Authorities are not providing confirmation of registration even though farmers have sent in the paperwork. It is now acceptable to simply show your assessor a copy of the letter you sent to the LA to register as proof. (DP.a.1)

## Mixing PPPs

When mixing PPPs (pesticides, insecticides, fungicides, herbicides and molluscicides) handling and filling instructions on the label must be followed. This is good practice and ensures they are correctly applied to prevent contamination or pollution of the wider environment as well as optimum effectiveness of the product. It is unlikely that your day-to-day routines will alter as a result of this additional standard which has been added to align the Combinable Crops and Sugar Beet standards with the Fresh Produce standards. (EC.f.1)



## Integrated Pest Management (IPM)

Previously we have recommended that Integrated Crop Management is adopted and discussed with staff on farm. This means you have given consideration to all areas of good agricultural practice with an emphasis on optimising the use of PPPs and fertilisers and improved protection of the environment. With the changes in the SUD this has been upgraded to a standard. (IM.a)

From January 2014 the SUD requires you demonstrate that IPM practices are being adhered to. Our revised standard requires that an IPM plan must be documented and followed. The basic elements of IPM are:

**Prevention:** indirect measures to reduce pest, weed and diseases infestations.

**Observation:** methods to determine when action is required.

**Intervention:** direct measures to reduce pests, weeds and diseases to economically acceptable levels.

You can download an IPM template from [www.voluntaryinitiative.org.uk/ipmp](http://www.voluntaryinitiative.org.uk/ipmp)

## Bitumen Use in Stores

The use of bitumen in stores has led to concerns that crops could be contaminated with PAH; a carcinogenic toxin. The standards have been revised in order to phase out the use of bitumen in both temporary and permanent stores is not permitted. (ST.n and ST.s)

## Site and Soil Management

Good soil management to help maintain soil condition can improve productivity. We have recommended in the past that you have a Soil Management Plan and feedback has identified that some members have a Soil Protection Review instead. You must have systems in place that aim to maintain soil structure and control erosion and this can be demonstrated either through a Soil Protection Review or Soil Management Plan. (SM.a) (Revised and upgraded from a recommendation)

# Checklist

We hope you find this checklist helpful. It is a quick reference list of what you need to do slightly differently. We have provided the relevant page number from the Standards Manual so you can easily find more guidance on each particular point if you need to.

Recommendations are listed at the bottom – you do not have to do these and they will not affect your certification.

Record templates will be available before 1st October on [www.redtractorassurance.org.uk](http://www.redtractorassurance.org.uk).

## Membership Rules

You are reminded to make sure you read the leaflet “How the Red Tractor Assurance Scheme works”.

It incorporates the Membership Rules which have been updated.

## Contact

For any queries relating to the Red Tractor Crops & Sugar Beet Scheme either contact your Certification Body (details listed in the back page of the Standards Manual) or contact Red Tractor Assurance:

**Call us**  
01932 589 800

**Email us**  
[crops@redtractor.org.uk](mailto:crops@redtractor.org.uk)

**Visit**  
[www.redtractorassurance.org.uk](http://www.redtractorassurance.org.uk)

|                |        |   |     |    |     |
|----------------|--------|---|-----|----|-----|
| <b>Page 03</b> | DP.a.1 | Do you have a copy of the confirmation of registration with your LA or a copy of the letter you originally sent to the LA?  | Yes | No | N/A |
| <b>Page 03</b> | DP.d   | Do you check new production sites/storage and tell your Certification Body?   | Yes | No | N/A |
| <b>Page 03</b> | SC.a   | Do you ensure new staff understand the work they have to do and are competent before being left to it?  | Yes | No | N/A |
| <b>Page 04</b> | SC.d   | If you use labour providers, do you have a labour provider agreement?   | Yes | No | N/A |
| <b>Page 04</b> | TI.a.2 | Do you have records showing destination/ point of first tip for loads leaving the farm? (Notes in diary are acceptable)   | Yes | No | N/A |
| <b>Page 04</b> | TI.b   | Do you take samples from each silo, storage bin, flat store and drying area at the time of filling?   | Yes | No | N/A |
| <b>Page 05</b> | VC.b   | Do you have a record of bait used, bait point inspection dates and bait replenishment dates?  | Yes | No | N/A |
| <b>Page 06</b> | RC.b   | Have you carried out a mycotoxin risk assessment for the current growing season and for each field of wheat?<br>Do you ensure clay pigeon shooting does not take place over standing fields of rape after the yellow bud stage?   | Yes | No | N/A |
| <b>Page 08</b> | EC.f.1 | Do you follow the handling and filling instructions on the label when mixing PPPs?  | Yes | No | N/A |
| <b>Page 08</b> | EC.i   | Are you aware that your sprayer equipment is required to be NSTS tested from 26th Nov 2016?   | Yes | No | N/A |
| <b>Page 12</b> | IM.a   | Do you have a documented Integrated Pest Management Plan?   | Yes | No | N/A |
| <b>Page 12</b> | SM.a   | Do you have a Soil Protection Review or Soil Management Plan?   | Yes | No | N/A |
| <b>Page 14</b> | ST.h   | Have you carried out a CIPC risk assessment for each of your stores?  | Yes | No | N/A |
| <b>Page 14</b> | ST.n   | Have you ensured that bitumen is not used in your permanent stores?   | Yes | No | N/A |
| <b>Page 14</b> | ST.p   | Will you ensure that temporary stores are not used after 31st October?  | Yes | No | N/A |
| <b>Page 15</b> | ST.s   | Are you aware that bitumen cannot be used for any new floors or as a filler in either permanent or temporary stores and that oilseeds do not come into contact with bitumen?  | Yes | No | N/A |
| <b>Page 15</b> | OT.d   | Do you ensure that your vehicles/ trailers/ sheets are thoroughly cleaned, power washed and sanitised with a combination food grade detergent/ disinfectant if they have been used for anything other than combinable crops before they are used for off farm delivery? | Yes | No | N/A |
| <b>Page 16</b> | OT.e   | Do you ensure that any trailers/ vehicles/ sheets used for anything on the TASCC Haulage Exclusion List are then not used for combinable crops?   | Yes | No | N/A |
| <b>Page 16</b> | OT.h   | Do you ensure that all bulk-tipping vehicles and trailers are sheeted during delivery off farm?   | Yes | No | N/A |

## Recommendations

|                |        |  |     |    |     |
|----------------|--------|--|-----|----|-----|
| <b>Page 04</b> | TI.a.3 | Do you take samples for each load leaving the farm and keep them for three months?                         | Yes | No | N/A |
| <b>Page 08</b> | EC.g.1 | Do you hold the relevant certificates for sprayer operation?   | Yes | No | N/A |
| <b>Page 09</b> | EC.k.3 | Have you notified the relevant authorities that you are storing fertiliser in accordance with legislation? | Yes | No | N/A |

