



**Agrichemical Warehousing
Standards Association**

**ACCREDITED SEED TREATMENT OPERATION
STANDARDS**

May 2016

www.awsa.ca

Accredited Seed Treatment Operation Standards Audit Protocol Guide

Second Edition

Effective May 1, 2016

Company Name: _____

Auditor: _____

**Auditor Telephone
Number:** _____

Audit Date: _____

Project Management Office 189 Queen Street East, Unit 1 Toronto, Ontario, M5A 1S2 1-877-236-2972 E-mail: seedcode@awsa.ca www.awsa.ca	CropLife Canada 400–10 Four Seasons Place Etobicoke, ON M9B 6H7 416-622-9771 www.croplife.ca
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DISCLAIMER

The Accredited Seed Treatment Operation Standards that follow are intended to be used by the Agrichemical Warehousing Standards Association (AWSA) for the purpose of issuance of a Compliance Certificate. Neither CropLife Canada, AWSA, their employees, members, allied associations or agents have made or hereby purport to make any representation, warranties or covenants with respect to the specifications or information contained in these compliance standards or the results generated by their use, nor will they be liable for damage or loss of claims, including those of an incidental or consequential nature, arising out of these compliance standards. These standards are not in any way intended to supersede or detract from any requirements contained in municipal, provincial or federal by-laws, regulations or legislation.

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PREFACE

CropLife Canada and its members created the Accredited Seed Treatment Operation Standards to provide uniform environmental, health and safety practices for the storage and handling of designated seed treatment products in Canada. The Standards were drafted by a multi-stakeholder working group consisting of registrants, distributors, ag-retailers, seed cleaning cooperatives, seed growers and relevant provincial and federal government agencies.

OBJECTIVE

The Standards, as set out in the Protocols that follow provide a mechanism to define and certify Accredited Seed Treatment Operations. The objective of the following protocols is to assist Accredited Seed Treatment Operation operators in the continuous improvement of managing the risks associated with the operation of a seed treatment facility.

TECHNICAL QUESTIONS

Technical questions or questions about interpretation of the Accredited Seed Treatment Operations Standards should be addressed to the AWSA at 877-236-2972 or seedcode@awsa.ca

OPERATIONAL SUPPORT

CropLife Canada via the AWSA will provide a compendium of supporting materials for operations engaging in the accreditation process. The documents will encompass an implementation guide for operations, check sheets, examples of standard operating procedures and checklists aimed at providing clear examples and templates for facilities to use in preparation for their initial pre-audit or audit. All materials will be made available electronically, as they are developed and updated periodically at www.awsa.ca.

STANDARDS EQUIVALENCY

Accredited Seed Treatment Operation Standards will be benchmarked against pre-existing government regulations (i.e. provincial regulations) and industry stewardship programs (i.e. Agrichemical Warehousing Standards and Canadian Seed Institute Standards) for equivalency. Protocols that are deemed equivalent to existing regulations and standards will be granted equivalency status upon verification by the Auditor (i.e. provide documentation of provincial certification and/or warehouse certificate of compliance in good standing).

AUDIT PROCESS & CYCLE

The Accredited Seed Treatment Operation Standards audit provides a numerical value that will measure the operation's performance against the established Standards.

A successful audit will allow the Accredited Seed Treatment Operation to use designated seed treatment products as designated by Canadian registrants for use in Canada. The purpose of each protocol is to provide the Auditor with a step-by-step guide in collecting evidence about an operation's facility and practices that have been included within the scope of the audit. The audit is a systematic comparison of the operation against established standards.

1. The frequency for auditing is every two years. For example, if an operation was audited any time during 2016, it is required to be re-audited within calendar year 2018 and each successive two-year period;
2. The timing of the audit or re-audit will be at the discretion of each operation's operator and an accredited AWSA Auditor, provided the operation is audited or re-audited within the specific timeframe;
3. It is the responsibility of the operation operator to coordinate the audit or re-audit;
4. The selection of an accredited AWSA Auditor is at the discretion of the operation operator. A current listing of approved Accredited Seed Treatment Operation Auditors can be found on the AWSA website (www.awsa.ca) or by contacting the AWSA office at 877-236-2972;
5. Please note, if an operation's Compliance Certificate has lapsed, the original re-audit cycle will remain. For example: If an operation was first accredited in October 2016, its re-audit is due by each successive year i.e. 2018, 2020, 2022 etc.;
6. Please note, for operations that fail to successfully re-audit within the required timeframe, all manufacturing and distribution members of CropLife Canada will be notified to suspend shipments of designated seed treatment product(s). Once a lapsed operation has been successfully re-audited, all manufacturing and distribution members will be notified, and the suspension of shipments will be removed;
7. Please note, the audit is a combination of Mandatory items and Scored items. Scored items must accumulate 80% of potential points available in each section of the audit. Protocols that are deemed "not applicable" will be granted full marks as part of the audit calculation. Recommended protocols are not scored.

AUDIT PREPARATION

To assist the Auditor in conducting an effective and efficient audit of your operation, the following suggestions will save time prior to and during the day of the audit.

BOOKING YOUR AUDIT

The operator can select an Auditor from the approved list of AWSA Auditors to conduct their audit. Audits should be scheduled several months prior to the audit date to avoid a shortage of auditing services. Booking the audit with the Auditor is the operator's responsibility. Each operation will be invoiced for the audit directly by the Auditor.

PRIOR TO THE AUDIT

1. Ensure that you, the operator, and employees involved in the storage, handling and application of seed treatment products have read and understood the audit protocols, and understand the objective of the audit;
2. Conduct a self-audit using the protocols to ensure that all areas of the operation meet the standards;
3. Consider a third-party pre-audit if this is a first time audit to address any areas of deficiency and develop strategies to achieve compliance; and
4. Advise all employees when the audit will be conducted in advance of the scheduled audit.

DAY OF THE AUDIT

1. Ensure that you, the operator, will have ample time to discuss the audit process and the results with the Auditor;
2. Allocate an appropriate time to accompany the Auditor throughout the audit;
3. Allocate a location for the Auditor to examine documents and prepare the audit report;
4. Encourage all employees involved in the storage, handling and application of seed treatment products to communicate with the Auditor in a candid manner;
5. Ensure that all relevant documentation is readily available for review by the Auditor (i.e. operating procedures, check lists, emergency response plans, site map, training files etc.);
6. The Auditor will ask for the operator to explain operation process flows (i.e. receiving seed treatment containers, transport of seed treatment containers and seed treating procedures) to verify written operational procedures;
7. The Auditor will prepare an audit report and request the owner/operator sign the completed audit forms and the application for audit form. A copy of the documents will remain with the operation owner/operator as record of the audit;
8. Each operation will be invoiced directly by the Auditor upon the completion of the audit.

APPLICATION FOR COMPLIANCE ACCREDITATION

All operations must complete this form at the time of the audit. A separate application form must be completed for each operation.

Accreditation Number: _____

Name of Applicant: _____

Address of the Operation: _____

The Operation hereby applies to the Agrichemical Warehousing Association for Accreditation in respect to this operation's compliance with the Protocols. In making this application, the owner/operator acknowledges and agrees to the following:

1. The operator accepts the Accredited Seed Treatment Operation Standards developed by CropLife Canada and industry stakeholders, and agrees to the appeal process established by CropLife Canada for the resolution of disputes arising with respect to the operation compliance with the standards;
2. The operator understands and agrees that in order to obtain accreditation for the operation, the operator must obtain independent accreditation by an independent Auditor on the approved list of AWSA Auditors;
3. The operator will permit access to the operation at all reasonable times for the purposes of the audit of the operation in connection with this application, and for any re-inspection of the operation in accordance with AWSA's quality control, compliance and any other policies that are in effect. Operator agrees that the results of any audit may be disclosed to CropLife Canada or industry stakeholders, or to such other project managers as the AWSA may designate from time to time;
4. Subject to the appeal process established by AWSA, from time to time the operator agrees to be bound by the Auditor's findings with respect to the operation;
5. The operator agrees to pay any costs and expenses arising in connection with the accreditation of the operation, including the Auditor's fees and expenses;
6. The operator releases any and all claims it has or may have in the future against the following: the AWSA; CropLife Canada; involved industry stakeholders; Funnel Communications Inc. or such other project manager as the AWSA may designate from time to time; and their respective members, directors, officers and employees; any Auditor or senior Auditor in connection with this application; any audits conducted at the operation and any failure by the operator to obtain accreditation;
7. If the operation obtains accreditation in respect to the operation, the operator understands that the obligation to maintain the operation according to the standards is mandatory, and the operator must continue to comply with the standards in order to maintain their Accreditation;
8. The operator understands that non-compliance with the standards will result in the cessation of shipments of designated seed treatment products by manufacturers and distributors in Canada.

Signature of Applicant

Title (if Corporation)

Date

Name (Please Print)

COMPLIANCE & ENFORCEMENT

The database of Accredited Seed Treatment Operations (and sites that have lapsed accreditation) will be available in a public forum on the AWSA website (www.awsa.ca).

As of January 1, 2017 only operations that have successfully completed an audit of the Accredited Seed Treatment Operation Standards will be eligible to receive seed treatment products that have been designated by the Canadian product registrant. A list of designated seed treatment products is available in a public forum on the AWSA website (www.awsa.ca).

Accredited Seed Treatment Operations are required to maintain their compliance with the standards at all times. If a situation exists where unaccredited facilities receive designated seed treatment product, a third party compliance process exists to investigate the situation and take remedial action.

1. COMPLIANCE PROCEDURE

Written, email (seedcode@awsa.ca), phone (877-236-2972) or fax (416-968-6118) complaints are to be sent to the AWSA office. The complaint is to outline details of the alleged non-compliance. The project manager will respect the confidentiality of the complainant.

2. QUALIFICATION PROCESS

- a) Project manager will designate an accredited AWSA Auditor to reported operation to investigate all details;
- b) As a working goal, the complaint is to be addressed nationally within three working days;
- c) Project manager will make an immediate initial report to the Accredited Seed Treatment Standards Program oversight committee;
- d) Oversight committee will review the report in conjunction with the Accredited Seed Treatment technical committee as appropriate, and direct the project manager on an appropriate response and course of action; and
- e) Project manager to notify the operation of course of action as a working goal before the fourth working day as to status.

3. RESOLUTION PROCESS

First Instance of Non-compliance

- a) Operation is advised in writing and is given a prescribed number of working days to undertake and complete corrective action measures dependent upon the type of non-compliance;
- b) Operator to confirm in writing that the non-compliant situation has been corrected;
- c) Report on non-compliance remains on file for two years from date of report;
- d) If non-compliance situation is not corrected within the prescribed timeframe, Accreditation is withdrawn and seed treatment product manufacturers and distributors are notified. To then obtain re-accreditation, a complete re-audit is required at the operation's expense. Re-accreditation is issued following a successful audit;
- e) AWSA management has option for second Auditor to visit operation to confirm compliance; and
- f) Unannounced audit may be performed at AWSA management's expense the following year.

Subsequent Instances of Non-Compliance

For any second and following instances of non-compliance (same operation and same area of non-compliance as a previous instance) within a two-year period (730 days) from previous instance:

- a) Upon validation, operation to be notified in writing that it has three working days to undertake and complete corrective action measures;
- b) Operator to confirm non-compliance issue corrected in writing;
- c) Report of non-compliance remains on file for two years from date of second infraction; and
- d) If situation is not corrected within prescribed timeframe, accreditation is withdrawn, and seed treatment product manufacturers and distributors are notified of the second instance of non-compliance.

4. AUDIT APPEALS PROCESS

- a) During the audit process, audited operations are first encouraged to resolve any uncertainties or disagreements with their chosen Auditor. The AWSA helpline and Technical Committee/senior Auditor may be consulted for assistance in the interpretation and application of the standards;
- b) Following the initial and any subsequent audits, audited operations will be provided a reasonable timeframe to correct identified areas of non-compliance before Compliance Accreditation is withdrawn based on the Auditor's assessment;
- c) The audited operation may request a review of the operation by the senior Auditor who may amend the audit decision. This review is a pre-requisite to an appeal to the Accredited Seed Treatment Operation Standards oversight committee;
- d) If the senior Auditor has issued notification that the Compliance Accreditation be withdrawn, the audited operation ("appellant") may appeal by submitting a written statement to the AWSA project manager explaining the circumstances and grounds for the appeal. This request shall be sent by registered mail or via email (seedcode@awsa.ca). It will be deemed received when acknowledgment of its receipt is given. An appeal fee of two thousand dollars (\$2,000.00) payable via credit card or wire transfer to AWSA must be paid to initiate the appeal. If the appeal is upheld, the fee will be refunded;
- e) The AWSA management in his/her capacity as chair of the Accredited Seed Treatment Operation Standards technical committee shall require a written report concerning the matter(s) under appeal from the appropriate Auditor, which is to be forwarded to the steering committee;
- f) The hearing of the Accredited Seed Treatment Operation Standards technical committee shall do the following:
 1. Provide a copy of the report of the senior Auditor to the appellant;
 2. Invite the senior Auditor and the appellant to submit any further information within five working days of receiving the invitation;
 3. Review any relevant matter with the senior Auditor and the appellant either in person, via telephone or in writing;
 4. Render a written decision on the appeal as expeditiously as possible while respecting the principles of procedural fairness;
 5. In the event that withdrawal of Accreditation is confirmed upon appeal, the withdrawal of accreditation will be in effect at such time as the operation receives correspondence from AWSA management;
 6. In the event the withdrawal of Accreditation is denied upon appeal, the withdrawal of accreditation Certificate will cease to be in effect at such time as the operation receives correspondence from AWSA management. In addition the appeal fee will be reimbursed within 3 working days of the operation receiving correspondence on the decision.

POLICY ON LAPSED ACCREDITATION

Lapsed accreditation is defined as a withdrawal of Accreditation resulting from:

1. Voluntary de-Accreditation;
2. Failure to successfully re-audit before the expiry date;
3. Withdrawal of Accreditation by AWSA management.

All operations require a full re-audit every two years to maintain Accreditation status. Operations that lapse for more than 12 months, will lose their grandfathered status.

POLICY ON RENOVATION OF ACCREDITED OPERATIONS

Periodically it is expected that operations Accredited will make changes to their operations. Any renovation made to an operation must comply with the Accredited Seed Treatment Operation Standards.

If significant renovation or replacements are performed (for example, the addition or full replacement of a seed treater, or a structural renovation to the building(s) in which a storage or seed treatment area is housed), these must be re-audited for compliance with the standards before use. The full operation will still be subject to a complete re-audit by their next scheduled re-audit date. Extenuating circumstances will be handled on an individual basis by AWSA management.

In situations where the renovation may impact grandfathered protocols (A1, A2, B2, B7, B10), operators should contact the AWSA office prior to initiating renovations for confirmation on the impact the planned renovations may have on their grandfathered status. Further expansion of the grandfathered condition will not be permitted.

POLICY ON CHANGE OF OWNERSHIP

If an operation changes ownership:

1. Operator is to notify AWSA project manager of change in ownership upon closing of purchase/transfer agreement;
2. Upon receipt of ownership change notification, the project manager will forward an "Application to Audit" form to be signed and returned within 30 days of transfer to new ownership;
3. The operation must re-audit within 90 days of transfer to new ownership, regardless of the date of the last audit. The new audit date would set the frequency thereafter; and
4. If the ownership change does not involve a significant change of personnel, the operation may apply for a waiver from these changes of ownership requirements.

POLICY ON GRANDFATHER PROVISIONS

Seed Treatment operations that have completed a pre-audit with an accredited AWSA Auditor before March 31, 2015 were eligible for grandfathering status, provided that the operation successfully completes a full audit prior to January 1, 2017. Record of grandfathering is maintained on record by AWSA.

This grandfathering provision applies for protocols A1, A2, B2, B3, B7 and B10. Operations that lapse for more than 12 months will lose their grandfathered status.

Renovation activities may impact grandfathered protocols (A1, A2, B2, B3, B7, B10). Operators should contact the AWSA office prior to initiating renovations for confirmation on the impact the planned renovations may have on their grandfathered status. Further expansion of the grandfathered condition will not be permitted.

See Bulletin #1 for details on grandfathered protocols.

SCOPE OF ACCREDITED SEED TREATMENT OPERATION STANDARDS

The standards apply to the storage of designated seed treatment products and the seed treatment application process as part of the operation. The standards do not apply to the storage of treated seed post application. Once accredited, sites will be required to comply with all protocols for all seed treatment activities included storage and treatment requirements for both designated and non-designated seed treatment products.

SECTION A – SITING AND EXTERIOR REQUIREMENTS

Auditors will *examine* a combination of documentation and physical attributes of the operation, considering its location, external design, construction, and exterior signage.

NO.	PROTOCOL	Full Compliance Score	Actual Score
A1	<p>All storage and fixed seed treatment areas are located at distances in excess of 30m from environmentally sensitive areas.</p> <p>Storage and fixed seed treatment areas pre-audited prior to March 31, 2015 were grandfathered with respect to the 30m buffer. Confirmation of grandfathering approval is held on file by AWSA.</p> <p><u>Note:</u> - Provincial Pesticide Act Regulation</p>	Mandatory	

A1 An environmentally sensitive area is a lake, stream, wetland etc. that contains some wildlife. A ditch that tends to run wet or a dugout is not considered an environmentally sensitive area.

Reference: Bulletin #1 - Grandfathering

NO.	PROTOCOL	Full Compliance Score	Actual Score
A2	<p>All facilities are located at distances beyond established municipal flood plains (100 yr.).</p> <p><u>Note:</u> - Provincial Environmental Act and Regulation</p>	Mandatory	

A2 For existing facilities, renovated facilities or new facilities located within established municipal flood plains (100 yr.) applications may be made to AWSA for approval, if significant flood diversion measures have been implemented to lessen the potential hazards associated with flooding activity. In addition, operations will be responsible for seeking all local/provincial approvals.

Reference: Bulletin #1 - Grandfathering

NO.	PROTOCOL	Full Compliance Score	Actual Score
A3	<p>The storage and/or seed treatment areas enclosed within a building have free access of 10 metres to at least two sides for firefighting access.</p> <p><u>Note:</u> - Fire Code Regulation/National Building Code</p>	Mandatory	

A3 A site *examination* shall *verify* clear access of a minimum of 10 metres to two sides of the exterior of the building (which may include occupancy in a larger building). If the clear access is less than 10 metres, written approval from the local fire department must be made available to the Auditor. Active rail sidings within 10 metres of the operation cannot be considered as free access.

NO.	PROTOCOL	Full Compliance Score	Actual Score
A4	<p>External lighting is in place on the side(s) of the building (storage and/or treatment areas) with entrances (including man-doors or overhead doors).</p> <p><u>Note:</u> - National Building Code</p>	10	

A4 The Auditor will *observe* and score 10 points for external lighting. Lighting must be positioned to allow viewing of exterior sides with doors. Lights may be remotely mounted. Yard lights and/or streetlights are acceptable.

If the accredited area is within a multi-purpose building, external lighting must be present on the exterior of the building where entrances exist to the seed treatment storage and/or treatment areas.

It is recommended as a best management practice that all sides of the building should be lit for additional safety and security.

NO.	PROTOCOL	Full Compliance Score	Actual Score
A5	<p>The operation's parking lot(s) for company employees, customers and visitors do(es) not obstruct passage for fire and emergency vehicles.</p> <p><u>Note:</u> - National Fire Code</p>	10	

A5 During the site examination the Auditor will *determine* that the parking lot(s) will not obstruct passage of fire and emergency vehicles.

NO.	PROTOCOL	Full Compliance Score	Actual Score
A6	<p>All <u>man-door</u> entrances to the storage area and seed treatment areas have legible pesticide warning signs, clearly identifying that agrichemicals are stored within the premises and that only authorized persons are entitled to enter.</p> <p>For mobile units with concealed compartments storing seed treatment products, pesticide warning signs must be present.</p> <p><u>Note:</u> - Provincial Pesticide Act and Regulation</p>	10	

A6 The Auditor will *observe* warning signs indicating the presence of agrichemicals are affixed on or near all man-doors/entries used to enter the accredited area of the building.

NO.	PROTOCOL	Full Compliance Score	Actual Score
A7	<p>The operation has an <u>external</u> sign posted which identifies:</p> <p>Name of the company and the phone number(s) of the person or entity in charge of the operation and/or the emergency phone numbers that will initiate the emergency response (ER) plan.</p> <p>For mobile units, signage must be affixed and clearly displayed.</p>	20	

A7 The Auditor will *examine* the site for posting of a sign legible from the primary entrance to the property. The sign shall be of a permanent, weatherproof construction and must be freestanding (not attached to a building).

NO.	PROTOCOL	Full Compliance Score	Actual Score
A8	Sign(s) are clearly posted inside the storage and/or seed treatment building(s) indicating: a) Emergency exits and exit routes within the building; b) Emergency supply cabinet; c) Spill cleanup equipment; d) Fire extinguisher(s); e) Portable or fixed eyewash station(s); f) External fire lane(s) around the building For outside treatment areas and mobile units, b, c, d and e are applicable.	10 10 10 10 10 10	

A8 The Auditor will *use professional judgment and observation* to determine the need for and application of signs for specified items identified above.

A. SITING & EXTERIOR REQUIREMENTS	Full Compliance Score	Actual Score
SCORED ITEMS There are three mandatory protocols in this section.	110	

NO.	PROTOCOL	Full Compliance Score	Actual Score
B3	For storage and/or seed treatment areas, windows that have be installed in interior fire separation walls are required to have a fire resistance rating of two hours, mounted in fixed steel frames.	20	

B3 The Auditor will *confirm* this by physical examination. Reference Bulletin #1 – Grandfathering.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B4	If there is an adjacent occupancy within the same building as the seed treatment and/or storage area(s), the ventilation system does not draw or allow air to transition from the seed treatment and storage area(s) into the adjacent occupancy.	Mandatory	

B4 The Auditor will *confirm* this by physical examination. Adjacent occupancies can be, but are not limited to, offices, lunchrooms and workshops. Reference Bulletin #2 for clarification on other occupancies.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B5	There is at least one exit man-door from the adjacent occupancy that does not enter the seed treatment area and/or storage area.	20	

B5 The Auditor will *confirm* by physical examination.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B6	All exit man-doors from the seed treatment area and/or storage area open in the direction of egress.	20	

B6 The Auditor will *determine* that all man-doors open in the direction of egress.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B7	<p>The accredited area:</p> <p>a) The <u>storage area</u> has curbing 10 cm minimum in height around the <u>perimeter</u> or may be protected by a containment system incorporating floors sloped to a collection area that is 10 cm lower than the perimeter surface, and/or to drains leading only to a designed containment area specifically used for chemical spills;</p> <p>b) The <u>seed treatment area</u> has curbing 10 cm minimum in height around the <u>perimeter</u> or may be protected by a containment system incorporating floors sloped to a collection area that is 10 cm lower than the perimeter surface, and/or to drains leading only to a designed containment area specifically used for chemical spills.</p> <p><u>Note:</u> - Provincial Pesticide Act Regulation</p>	Mandatory 30	

B7 The Auditor will *determine* if the accredited area is protected by retention curbing or a designed containment system. Curbing of at least 10 cm in height may be of concrete or steel, it must extend to the entire perimeter of the accredited area.

If the curbing is made of angle iron or concrete that is not a single pour, caulking which is impervious to agrichemical spill absorption must be applied to ensure that spills cannot seep out through a crack. Multi-floor structures need curbing on all levels. Angle iron must have a minimum width of .25 inches.

Metal sheeting that is deemed impervious to chemical spills is acceptable.

Baffled spill pallets that are deemed impervious to chemical spills are acceptable. Baffled pallets must be have sufficient containment capacity to hold 110% of volumes of seed treatment product(s) stored.

All containment systems must have 110% of the capacity of the maximum amount of chemical present at any time.

Reference: Bulletin # 1 – Grandfathering

NO.	PROTOCOL	Full Compliance Score	Actual Score
B8	<p>The containment area in the accredited area:</p> <p>a) The floors/containment materials of the <u>storage catchment area</u> have been designed or treated and maintained to render them impervious to absorption by a chemical spill (concentrated product, does not include treated seed) and;</p>	30	

	<p>b) The floors/containment of the storage catchment area have had all cracks filled and have a smooth finish. The material used to fill the cracks must be impervious to chemical spill absorption.</p> <p>- Provincial Pesticide Act Regulation</p>	Mandatory	
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B8 The Auditor will *examine* documentation to determine if the floors/containment materials have been treated and maintained in accordance with the manufacturer's recommendations to render them impervious to chemical spills. Imperviousness to petroleum solvent absorption is an acceptable benchmark.

The Auditor will *use professional judgment* to determine if the treatment is in good condition. The Auditor will *examine* the floors in the accredited area. All cracks 2 mm (thickness of a coin), saw cuts etc. must be sealed/filled and the floor must have a surface that can be safely worked on and maintained/cleaned.

Metal sheeting that is deemed impervious to chemical spills is acceptable.

Baffled spill pallets that are deemed impervious to chemical spills are acceptable.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B9	<p>The containment area in the accredited area:</p> <p>a) Containment for all seed treatment areas has been designed or treated and maintained to render them impervious to absorption by a chemical spill (concentrated product, does not include treated seed) and;</p> <p>b) Floors/containment of the seed treatment catchment area have had all cracks filled and have a smooth finish. The material used to fill the cracks must be impervious to chemical spill absorption.</p> <p>Note: - Provincial Pesticide Act Regulation</p>	<p>30</p> <p>Mandatory</p>	

B9 The Auditor will *examine* documentation to determine if the floors/containment materials (for both internal and external seed treatment areas) have been treated and maintained in accordance with the manufacturer's recommendations to render them impervious to chemical spills. Imperviousness to petroleum solvent absorption is an acceptable benchmark.

The Auditor will *use professional judgment* to determine if the floor treatment is in good condition. The Auditor will *examine* the floors in the accredited area. All cracks 2 mm (thickness of a one dollar coin), saw cuts etc. must be sealed/filled and the floor must have a surface that can be safely worked on and maintained/cleaned.

Metal sheeting that is deemed impervious to chemical spills is acceptable.

Baffled spill pallets that are deemed impervious to chemical spills are acceptable.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B10	<p>a. Floors and floor support structures for the <u>storage area</u> must be constructed of non-combustible materials.</p> <p>b. Floors and floor support structures for <u>seed treatment areas</u> must be constructed of non-combustible materials.</p> <p>Note: - Provincial Pesticide Act Regulation</p>	Mandatory 30	

B10 The only acceptable materials for the floor are concrete or steel.

Reference Bulletin #1 for Grandfathered provisions.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B11	<p>The accredited areas (both storage and seed treatment) do not have any active floor drains.</p> <p>Note: - Provincial Pesticide Act Regulation</p>	Mandatory	

B11 The Auditor will *confirm* through *visual inspection* that the accredited area does not have any active floor drains.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B12	<p>The <u>storage area</u> has active mechanical ventilation designed to provide a minimum of two air changes/hr when the area is occupied.</p>	Mandatory	

B12 Auditor will *examine* the mechanical ventilation system for the accredited area. The Auditor will *determine* the system rating from the exhaust fan assembly, documents signed by the installer or engineer's stamped drawings indicating exhaust rates of at least two air changes per hour.

Sample calculation: $\frac{\text{Length} \times \text{width} \times \text{height}}{30} = \text{minimum CFM requirement}$

Example: Area is 20 feet in length, 10 feet wide and 8 feet high. Calculation is:

$$\frac{20 \times 10 \times 8}{30} = 53.33 \text{ CFM fan}$$

This means that that the operation will need a fan with a minimum of 53.33 CFM's to achieve a minimum of 2 air changes per hour.

Technical information for the fan must be on file to indicate CFM's.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B13	The <u>seed treatment application area</u> has active mechanical ventilation designed to provide a minimum of two air changes/hr for when the area is occupied.	Mandatory	

B13 Auditor will *examine* the mechanical ventilation system for the accredited area. The Auditor will *determine* the system rating from the exhaust fan assembly, documents signed by the installer or engineer's stamped drawings indicating exhaust rates of at least two air changes per hour.

Sample calculation: $\frac{\text{Length} \times \text{width} \times \text{height}}{30} = \text{minimum CFM requirement}$

Example: Area is 20 feet in length, 10 feet wide and 8 feet high. Calculation is

$$\frac{20 \times 10 \times 8}{30} = 53.33 \text{ CFM fan}$$

This means that the operation will need a fan with a minimum of 53.33 CFM's to achieve a minimum of two air changes per hour. Technical information for the fan must be on file to indicate CFM's.

In seed treatment facilities where occupancy ventilation cannot be reasonably satisfied, overhead mechanical ventilation will be deemed acceptable if two air changes per hour are achieved in the immediate treating area. Documentation of verification by engineer upon installation with recommended maintenance/calibration schedule is required.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B14	Within the storage area, the ventilation system is designed to control explosive vapours.	10	

B14 Explosive vapours for products that produce vapours heavier than air, may be controlled by at least one air inlet and one exhaust outlet systems (ventilation) within 300 mm of the floor (vapours of products that are lighter than air (ethylene in compressed gas cylinders) require exhaust at ceiling levels. Auditors can determine vapour density of products from MSDS/SDS's.

Alternatively, the ventilation system may incorporate the general dilution principle.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B15	The heating systems in the storage and seed treatment areas are designed and installed to meet applicable codes (i.e., gas, electrical, fire). Electric unit heaters must be CSA/ULC approved for industrial/commercial use and must be hardwired.	Mandatory	

B15 Electric unit heaters must be CSA/ULC approved for industrial/commercial use and must be hardwired. No open flame systems are permitted.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B16	Electrical lighting has been installed within the storage and all seed treatment areas to provide sufficient intensity for safe working conditions. Lighting is in place on mobile units if seed treatment activities are being undertaken during hours of the day when natural light is not present.	Mandatory	

B16 Lighting exists such that product labels and safety instructions on products, signs and equipment within the accredited area can be easily read.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B17	a) Within the storage area and seed treatment areas, portable fire extinguishers are installed in, or adjacent to, corridors, exits and aisles that provide access to exits and in proximity to other fire hazards;	20	
	b) A properly secured fire extinguisher is installed on each forklift;	20	
	c) A properly secured fire extinguisher is installed on the mobile seed treatment unit.	Mandatory	

B17 Accredited areas are rated as ordinary hazard. This requires a minimum 2A 10BC fire extinguisher within 9 metres of the enclosed seed treatment area and seed treatment product storage area, or a minimum 2A 20BC fire extinguisher within 15 metres travel distance of the enclosed seed treatment area and seed treatment product storage area. Examples of other fire hazard areas are as follows:

- a) In and around bulk loading/unloading electrically driven motors and;
- b) At electrical battery charging stations.

If forklifts are on site, each forklift shall have at minimum one 3A 10-BC extinguisher (minimum 5 lbs).

For mobile units, a minimum 10 lbs 4A 60-BC fire extinguisher is required.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B18	Seed treatment equipment:	Mandatory 20	
	a) Has an easily accessible, labeled, emergency shutoff device/switch within close proximity of seed treating equipment and;		
	b) All open augers, belts, pulleys and motors have appropriate protective guarding		

B18 Auditor *visual inspection* of seed treatment equipment.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B19	The storage area and the enclosed seed treatment areas have a fire detection system. The system is connected to a 24 hour monitoring station.	Recommended	

B19 The accredited area and the building it is located within have a fire detection system throughout.

The Auditor will *examine* the fire detection and monitoring system and current documentation (within the last 12 months) to verify that it provides 24-hour protection for the entire structure.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B20	The storage area and the enclosed seed treatment areas have a security system. The system is connected to a 24 hour monitoring station.	Recommended	

B20 The accredited area and the building it is located within shall have a security system throughout.

The Auditor will *examine* the fire detection and monitoring system and current documentation (within the last 12 months) to verify that it provides 24-hour protection for the entire structure.

B. STRUCTURAL	Full Compliance Score	Actual Score
SCORED ITEMS There are 16 Mandatory and 2 Recommended protocols in this section.	250	

SECTION C – OPERATIONS

NO.	PROTOCOL	Full Compliance Score	Actual Score
C1	Smoking, drinking, and eating in the storage and seed treatment areas is strictly forbidden, and permanent signs to this effect are posted.	Mandatory	

- C1** The Auditor will *observe* that the accredited area is clearly posted with permanent (weatherproof if outside) signs stating that smoking, drinking and eating are not allowed in the storage and/or seed treatment area.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C2	<p>The operation has a posted <u>inventory list</u> and location of designated <u>emergency equipment</u> and supplies that are stored in a specific location for use only in emergencies.</p> <p>Emergency equipment at the operation includes:</p> <ul style="list-style-type: none"> a) First aid kit; b) Eyewash station or eyewash shower; c) Sealable salvage container (over pack); d) Both absorbent/neutralizing materials as per MSDS/SDS; e) Aluminum shovel and a broom; f) PPE (including: gloves, goggles, coveralls and rubber boots); g) Respirator and chemical cartridge(s) (if applicable – product specific). 	<p>10</p> <p>30</p> <p>30</p> <p>10</p> <p>10</p> <p>10</p> <p>10</p> <p>10</p>	

- C2** The Auditor will *observe* that a list of emergency equipment available at the site is posted near or on the storage location for the equipment. The Auditor will *examine* basic emergency equipment to *ensure* that they are usable, clean and adequately equipped.

The Auditor will *determine* from sample MSDS's what types of cleanup equipment (i.e., gloves, respirator cartridges, shovel etc.) and absorbents (i.e., clay, vermiculite and polymer) are required. The Auditor will *confirm* that these are available. Emergency equipment must be stored off the floor to prevent contamination.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C3	<p>All seed treatment products in the storage or seed treatment area have a label (referencing the seed treatment application/operation procedure(s) regulated by the P.C.P. Act).</p> <p>Note: - Provincial Pesticide Act Regulation</p>	Mandatory	

- C3** The Auditor will *examine* products stored in the accredited area.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C4	All treated seed is labeled in accordance with regulatory requirements. Note: Reference: Covered under the Seeds Act and Pesticide Act (schedule 2)	Mandatory	

C4 The Auditor will *inspect* the presence of proper labels for treated seed.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C5	There are no flammable, combustible fuel products and/or spare compressed flammable liquefied storage cylinders stored inside the storage or seed treatment area.	20	

C5 The Auditor will *inspect* to *ensure* there are no flammable or combustible fuel products stored inside the accredited area. If the site uses propane powered forklifts, the Auditor upon *inspection* of the site will find all spare tanks stored outside the building, protected from direct sunlight and excessive heat buildup.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C6	Floors, ramps, stairways, shipping areas are clean, tidy and in good repair.	10	

C6 Upon *inspection* of the floors, ramps, stairways and shipping dock areas, the Auditor will find these areas are kept clean, orderly and in a good state of repair.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C7	There were no leaking packages/containers, open containers not currently in use or contaminated seed piles/clumps within the operation (both storage and seed treating area).	10	

C7 Upon *inspection* of the accredited area, the Auditor will *not find leaking packages or containers*. Over-packed, re-bagged or damaged containers, which have been replaced or repaired with appropriate labeling, are acceptable.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C8	Seed treatment products not being actively used are stored in the storage area (including full or partially full containers/totes).	Mandatory	

C8 Pest control products classified as commercial or agricultural shall not be stored outside the accredited area.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C9	Each employee working in the accredited area must have and use appropriate personal protection equipment as per label and MSDS/SDS requirements.	Mandatory	

C9 The Auditor will *inspect* product labels to *verify* all equipment present is clean and in good working order, and is stored in an appropriate manner.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C10	Empty seed treatment containers are: a) empty containers designed for one-way use (both bulk and less than 23L) on the premises; kept in their designated area; not kept in unreasonably large quantities; triple/pressure rinsed (if applicable), rinsate is appropriately disposed of as per operating procedures; regularly returned for recycling to a designated collection site and; b) empty containers designated as returnable/re-fillable on the premises; kept in a designated area; not kept in unreasonably large quantities and are returned to the retailer/registrant for future use.	10 10	

C10 Auditor will *observe* that there is not an unreasonable number of empty containers (both bulk and less than 23L) on the premises beyond what would be expected during normal business operation.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C11	Materials and/or equipment required for the site containment plan are in place and readily available.	Mandatory	

C11 The auditor will inspect and confirm that all materials and/or equipment for the site containment plan are in place and readily available.

NO.	PROTOCOL	Full Compliance Score	Actual Score
C12	Seed treatment equipment is maintained in accordance with manufacturer's specifications	Mandatory	

C12 The Auditor will *inspect* equipment maintenance records (i.e., calibration log, manufacturer manual – scheduled maintenance), and *perform a visual observation* of the operation and seed treatment storage area.

C. OPERATIONAL	Full Compliance Score	Actual Score
SCORED ITEMS There are seven mandatory protocols in this section.	180	

SECTION D – TRAINING

The operator will provide the organizational chart for the accredited operation. Those employees who are directly involved in receiving seed treatment product(s), shipping, storage and the seed treatment application activities will all be involved in the training process. This will also include temporary employees or part time employees. Any employee who handles seed treatment products and seed treatment equipment will be included. This organizational chart is necessary during the audit so the Auditor can track the movement of employees, and therefore can track the training activities of new or transferred employees.

Summary of Training Frequency Requirement

D1	Site Rules	New hires and when rules change
D2	Safe Operating Procedures	At start of a new job
D3	TDG	Every 3 years
D4	WHMIS/MSDS/SDS	Upon employment with annual review
D5	Product Labeling	At start of a new job or products change
D6	Provincial Operator Certification	Valid Certificate
D7	Forklift Training	Every 3 years or provincially legislated requirements
D8	OH&S	At start of a new job
D9	First Aid/CPR	Valid Certificate
D10	Emergency Response	Annually

NO.	PROTOCOL	Full Compliance Score	Actual Score
D1	The operator has developed, issued and reviewed the general site rules with all employees of the site. During discussion and observation, it appears that these rules are enforced.	Mandatory	

D1 *Inspect* the written operating rules established for the site (including operation policy and procedures). *Determine* if the operating rules have been issued/posted within the operation, and if all employees have signed off on them. *Observe* during evidence gathering that the rules are being followed and enforced. (Reference Protocols E7, E8, E9, E14, E15, E16).

NO.	PROTOCOL	Full Compliance Score	Actual Score
D2	Training has been provided to all employees on the safe operating procedures for each of their jobs. <u>Observations:</u> - Appropriate training to each individual's risk exposure.	Mandatory	

D2 *Inspect* the operation's training records for safe operating procedures for each job. *Review* training records and employee sign off. Reference protocols E7, E9.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D3	All employees handling seed treatment products have had training on the TDG Act and Regulations. This may include clerical staff involved in the transportation and administration process.	Mandatory	

D3 The Auditor shall *examine* current training records and employee sign off. Note: TDG retraining is required every three years. Online TDG training is available on the AWSA website (www.awsa.ca). Auditor will *examine* training certificates that meet TDG regulation. Reference protocol E12.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D4	WHMIS training has been provided for all employees handling seed treatment products.	Mandatory	

D4 Federal and Provincial regulations require that WHMIS training be provided to employees handling hazardous products. The Auditor will *examine* training records and employee sign off. WHMIS training is required upon hiring and is subject to an annual review. Note: Online WHMIS training is available on the AWSA website (www.awsa.ca).

NO.	PROTOCOL	Full Compliance Score	Actual Score
D5	Seed treatment product label training (i.e., comprehension) has been provided for all employees handling seed treatment products. Note: - Provincial Pesticide Act Regulation.	Mandatory	

D5 The Auditor will *examine* training records and employee sign off. Note: Online label training is available on the AWSA website (<http://www.awsa.ca>).

NO.	PROTOCOL	Full Compliance Score	Actual Score
D6	An individual who is responsible for the seed treatment operation has obtained provincial seed treatment operator certification (if applicable—refer to provincial requirements). Note: - Provincial Pesticide Act Regulation (if applicable).	Mandatory	

D6 The Auditor will *inspect* the current certification of at least one employee to *ensure* that a permanent onsite staff member holds a valid provincial certificate/licence.

Reference: Bulletin #3

NO.	PROTOCOL	Full Compliance Score	Actual Score
D7	All forklift drivers who work within the accredited area have undergone lift truck training provided by a qualified trainer.	Mandatory	

D7 The Auditor will *determine* who the forklift truck drivers are within the accredited area during the development of the organizational chart. Examine forklift training certificates. Trainers must meet the qualifications as outlined in CSA B335-15.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D8	For all employees working within the seed treatment operation, the site has developed and implemented an environmental health and safety training program. Training will consist of: a) Use, maintenance and storage of personal protection equipment; b) Information on the rights of employees to refuse or stop unsafe work; c) The use of an eye wash station; d) Responsibilities of management and employees under the appropriate labour legislation; e) Fire extinguisher training (hands-on/discharge).	20 20 20 20 20	

D8 The Auditor will *examine* training records and employee sign off. As an example, a written record of fire extinguisher training will suffice. Reference protocol E8. For sites where the owner is the sole operator, B, C and D are exempt.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D9	Training has been provided for appropriate personnel on: a) First aid; b) Cardiopulmonary resuscitation (CPR).	Mandatory	

D9 *Inspect* the valid certificate of at least one employee onsite for first aid and CPR training. For sites where the owner is the sole operator, they are exempt. On-line training is not acceptable.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D10	a) Training has been provided for all operation employees on the execution of the ER Plan for the site on an annual basis b) Information has been provided to contractors/site visitors on emergency procedures that pertain to them. <u>Observations:</u> - Annual training is to be determined by operation management.	Mandatory Mandatory	

D10 The Auditor will *inspect* the employees' sign-off sheets for appropriate personnel (employees on the ER team) to verify that training took place. Annual training is to be determined by operation management. The Auditor will *review* documentation indicating information has been shared with contractors and site visitors on the applicable emergency procedures. Reference protocol E10.

D. TRAINING	Full Compliance Score	Actual Score
SCORED ITEMS There are nine mandatory protocols in this section.	100	

SECTION E – DOCUMENTATION

NO.	PROTOCOL	Full Compliance Score	Actual Score
E1	<p>Grandfathered storage and seed treatment areas within 30m of environmentally sensitive areas must have written authorization and/or notice from local authorities having jurisdiction (i.e. local planning authorities or Ministry of Environment).</p> <p><u>Observations:</u> - One authorization is sufficient.</p>	Mandatory	

E1 An environmentally sensitive area is a lake, stream wetland etc. that contains some wildlife. A ditch that tends to run wet or a dugout is not considered an environmentally sensitive area.

For grandfathered operations located within 30m of environmentally sensitive areas, where authorities have not provided written authorization, a receipt of the operation's request being sent to the authority having jurisdiction was required.

Reference protocol A1.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E2	<p>Grandfathered storage and seed treatment structures constructed on municipal flood plains (100 yr.) have written authorization from local authorities (local planning authorities or Ministry of Environment).</p> <p><u>Note:</u> - Fire Code</p>	Mandatory	

E2 The Auditor must *be knowledgeable* on the historical background of the geographical area in which work is being done as it pertains to recognized flood plain land. Generally, facilities close to rivers, lakes or large streams are subject to flooding. The lower mainland of British Columbia (Richmond & Delta) is an example of land situated on a flood plain. Information on flood plain land can be obtained from local Conservation Authorities, Municipal Authorities or Natural Resources Departments.

It is not recommended to locate a seed treatment operation on land within 100 year flood plains. Written authorization to operate on a flood plain could be obtained from the Conservation Authority, local fire chief, local planning authority, the Ministry of Environment or Natural Resources.

For grandfathered operations located on flood plains, where authorities have not provided written authorization, a receipt of the operation's request being sent to the authority having jurisdiction was required.

Reference Protocol A2.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E3	<p>A written plan is in place to manage volumes of fire water on the operation. A copy of this plan must be included with the emergency response plan.</p> <p><u>Note:</u> - Provincial Environmental Requirement may exceed the protocol requirement</p>	Mandatory	

E3 *Inspect* the written plan to manage volumes of fire water. Ask the operator to explain how the plan will work.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E4	<p>A written plan is in place to manage volumes of contaminated water and/or other liquids used in the cleaning/flushing of the seed treating equipment on the site.</p>	30	

E4 *Inspect* the written plan to manage volumes of contaminated water.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E5	<p>Documentation for storage and seed treatment area is provided by a licensed electrician, electrical engineer or the appropriate authority, which verifies that all electrical installations (includes lights, globes, wiring, switches, motors, circuit breakers, fans and main panel) have been inspected since the last audit.</p> <p><u>Note:</u> - Electrical Code</p>	Mandatory	

E5 The Auditor will *ensure* that the document prepared by an electrician identifies the licence number.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E6	<p>This accredited area has a written inspection program for its heating and ventilation systems, forklift trucks and dock levelers. This program is documented and the Auditor was shown completed past checklists, which support the program:</p> <ul style="list-style-type: none"> a) Heating system; b) Forklift trucks; c) Ventilation systems. d) Dock levelers 	<p>10 10 10 10</p>	

E6 *Inspect* the written equipment inspection program together with past usage inspection reports.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E7	<p>This operation has <u>written</u> procedures for maintenance:</p> <ul style="list-style-type: none"> a) Bagging and bulk handling equipment; b) Care and use of seed treatment equipment; c) Containment inspection and maintenance 	Mandatory	

E7 *Inspect* the written equipment inspection program together with past usage inspection reports.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E8	<p>The operation has established <u>written</u> procedures for the care and use of the following emergency and safety equipment:</p> <ul style="list-style-type: none"> a) First aid kit; b) Eyewash station; c) Fire extinguishers; d) Personal protection equipment; e) Spill cleanup equipment and supplies. 	Mandatory	

E8 *Inspect* the written operating procedures for the care and use of emergency equipment together with past usage inspection reports.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E9	The operation has written procedures for the proper handling, storage and disposal of contaminated products, rinsate from cleaning containers, hazardous waste materials, spill cleanup and treated seed disposal that meets all legal requirements. <u>Note:</u> - Provincial Environmental Regulations	Mandatory	

E9 *Inspect* the written procedures for the proper handling storage, spill cleanup and disposal of contaminated products and hazardous waste materials.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E10	a) A copy of all current MSDS/SDS's for seed treatment products handled is available; b) At least one copy is available outside of the storage and/or seed treatment area and is readily accessible.	30 30	

E10 a) *Verify* with the operator the availability of MSDS/SDS's for all products handled. If the operation chooses electronic format these must be readily accessible during operating hours.

b) Ensure that at least one copy of all MSDS/SDS's is maintained outside of the storage and/or seed treatment area. If this copy is in electronic format (such as PDF, bookmarked web browser—Note: a Google search is not sufficient), devices must exist to access the data during an emergency.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E11	A system has been/is established for maintaining onsite inventory of seed treatment product(s) for emergency response purposes.	20	

E11 *Have the operator describe* inventory management system. Auditor will *inspect* inventory record and seed treatment log.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E12	<p>This operation ships and receives designated seed treatment product(s) in conformance with Transportation of Dangerous Goods (TDG) regulations and can produce shipping documentation to verify compliance, if applicable. <i>(To be verified by the Auditor)</i></p> <p>Note: - TDG Requirement</p>	20	

E12 Ask the operator how products are shipped to meet TDG regulations when reviewing the shipping documents.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E13	<p>a) All fire extinguishers are tagged to signify a self-inspection has occurred <u>monthly while the accredited area is occupied and/or seed treatment products are being stored.</u></p> <p>b) The current annual certified inspection tag must be attached to the fire extinguisher.</p> <p>Note: - Fire Regulation</p>	10 Mandatory	

E13 The Auditor will *determine* during which months the accredited area was operated/occupied. This information will be used to examine fire extinguishers for monthly inspection sign-offs. The annual certified inspection tag must be attached to the fire extinguisher. Monthly inspections can be documented on the annual tag or be posted near each extinguisher.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E14	The operation has established a standard written operating procedure requiring all accidents/incidents be investigated, recorded and reported.	20	

E14 The Auditor will *examine* documentation supporting investigation requirements and completed investigations.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E15	The operation has established standard written operating procedure for the return to empty container collection sites or retailer/registrant.	20	

E15 The Auditor will *observe* that there are not an unreasonable number of empty containers (both bulk and less than 23L) on the premises beyond what would be expected during normal business operation. The Auditor will also observe the empty container management strategy as part of site inventory management strategy.

NO.	PROTOCOL	Full Compliance Score	Actual Score
E16	Where applicable, the operation has established written procedures for: a) Seed treatment product transfer (from container to seed treatment equipment/applicator); b) Treating; c) Cleaning; d) Calibration; e) Production/product tracking (i.e., product lot numbers, production log etc.); f) Safe work procedures (hot work, confined space, elevated work, lock out etc.) g) Labeling of treated seed in accordance with product label requirements	Mandatory	

E16 Auditor will *inspect* operating procedures and production records

E. DOCUMENTATION	Full Compliance Score	Actual Score
SCORED ITEMS There are nine mandatory protocols in this section.	220	

SECTION F – EMPLOYEE KNOWLEDGE

Evidence of employee knowledge can be obtained in an informal manner while inspecting the operation. The Auditor should concentrate on the employee in charge, but not neglect other employees involved with seed treatment activities. This section is the most subjective. It is quite satisfactory if an employee knows where to find an answer and looks it up. Skill in asking questions and listening to the answers is of utmost import. Auditors may want to list a few questions to ask to ensure compliance to each protocol.

All employees working in the accredited area must be knowledgeable in these topics as it pertains to their work in order to be awarded the points.

NO.	PROTOCOL	Full Compliance Score	Actual Score
F1	When interviewing employees with Emergency Response (ER) responsibility in the operation, they were knowledgeable regarding their responsibilities in the event of an emergency.	20	

F1 The Auditor must *ensure* that the ER Plan has been inspected prior to discussing this protocol. A good time to review the ER Plan is at the opening meeting. With a good knowledge of the organizational chart and ensuring that operation's employees have been assigned ER responsibilities, ask each employee what their roles are. Questions such as:

- a) Who has overall responsibility for the ER Plan?
- b) What would you do first if you spotted a fire at the operation?
- c) What is your specific responsibility?
- d) What role will the local fire department play in the fire?

NO.	PROTOCOL	Full Compliance Score	Actual Score
F2	<p>The employees can explain the established procedures for the use and/or care of emergency and safety equipment such as:</p> <ol style="list-style-type: none"> a) Personal protection equipment; b) First aid kits; c) Eyewash stations; d) Fire extinguishers. 	<p>20 10 10 10</p>	

F2 To be in compliance with this protocol, written procedures for the care and use of emergency equipment must be evident (see E11). *Inspect* these at the opening meeting. Some sample questions to ask employees are:

- a) Describe how you maintain your first aid kit.
- b) How would you use the eye wash station? How do you maintain the eye wash station?
- c) Describe how you would use a portable fire extinguisher to fight a fire.
- d) How often is the emergency equipment inspected?

NO.	PROTOCOL	Full Compliance Score	Actual Score
F3	<p>The appropriate employees that have direct job-related duties in the seed treatment storage and treatment areas can explain the established procedures for the following:</p> <ul style="list-style-type: none"> a) Storage of seed treatment products; b) Safe and effective application of seed treatment products (including label awareness); c) Care, operation and cleaning of seed treatment equipment; d) Labeling of treated seed. 	<p>10 10 10 10</p>	

F3 Have the employees explain the established procedures for a), b) c) and d) above.

NO.	PROTOCOL	Full Compliance Score	Actual Score
F4	<p>Employees can describe spill cleanup procedures and know where the emergency supplies and equipment are located.</p> <p><u>Note:</u> - Environmental Regulation</p>	20	

F4 To be in compliance with this protocol, written site-specific cleanup procedures must be evident. *Inspect* to see that cleanup equipment is onsite and in a designated location, and identified. Ask the questions:

- a) Describe to me how you cleanup and decontaminate a spill.
- b) What do you include on the label of the container when you are storing spilled cleanup products?
- c) Does any agency need to be contact in the event of a spill? Spill hotline number.

NO.	PROTOCOL	Full Compliance Score	Actual Score
F5	<p>In discussing the handling and disposal of contaminated product or hazardous waste materials with employees, they were knowledgeable on the written procedures.</p>	10	

F5 To be in compliance with this protocol, written procedures for the handling and disposal of contaminated product and hazardous waste materials must be evident. *Ask questions* such as:

- a) Describe to me your understanding of a hazardous waste material.
- b) How do you handle and dispose of hazardous waste material?

Does the answer to (b) correspond to the written procedure?

NO.	PROTOCOL	Full Compliance Score	Actual Score
F6	<p>The employees interviewed were knowledgeable on MSDS/SDS's</p> <p>a) How to access/where the MSDS/SDS's are kept?</p> <p>For a selected product, use the MSDS/SDS' to:</p> <p>b) Describe hazards of the product;</p> <p>c) Describe the personal protective equipment required;</p> <p>d) Describe first aid procedures.</p>	<p>10</p> <p>10</p> <p>10</p> <p>10</p>	

F6 The Auditor will *interview* employees. If only available electronically, MSDS/SDS's should be bookmarked & connected via an open link.

NO.	PROTOCOL	Full Compliance Score	Actual Score
F7	Forklift operators can explain the safe operation of the forklift.	20	

F7 Sample Questions:

- What is the daily inspection procedure (circle check)?
- What is the proper procedure to drive a loaded forklift down an incline?
- Describe the safe refueling procedure for the forklift.
- Describe the position of the forks when traveling forward empty.

F.	EMPLOYEE KNOWLEDGE	Full Compliance Score	Actual Score
	<p>SCORED ITEMS</p> <p>There are no mandatory protocols in this section.</p>	200	

SECTION G – EMERGENCY RESPONSE

NO.	PROTOCOL	Full Compliance Score	Actual Score
G1	<p>The operation's written Emergency Response (ER) Plan was reviewed with the Auditor and it includes:</p> <p>a) A dated index that references page numbers</p> <p>b) An organizational chart that details the following:</p> <ul style="list-style-type: none"> i) The responsibilities of each position on the chart; ii) The telephone numbers of all emergency responders, employees, local medical facilities, governmental agencies, product suppliers, environmental services companies and adjacent land owners/tenants; iii) A drawing of the site plan indicating emergency response equipment and supplies, containment area, control centres, emergency routes and relative locations of seed treatment products; iv) A written management plan for volumes of estimated fire water and spilled liquids (E3 & E4); v) A list of the distribution of the ER plan; vi) A list of events that initiate the ER plan; vii) The location of seed treatment product inventory list. 	Mandatory	

G1 *Inspect* the written ER Plan to *ensure* it includes all elements. The ER Plan must be contained in a separate binder/booklet in an organized fashion. The Auditor will *confirm* that all employees on the distribution list of the ER Plan will have their individual, separate ER plans in a binder/booklet. The ER will be dated with the date of the last revision. Item c does not apply for mobile units.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G2	<p>Current copies of the Emergency Response Plan are kept:</p> <ul style="list-style-type: none"> a) In the office and at a designated location off-site b) With each designated person on the ER distribution list. c) A copy of the Emergency Response Plan is kept with the mobile unit and is stored in a weather proof container. 	<p>20</p> <p>20</p> <p>20</p>	

G2 The Auditor will *verify* that copies of the Emergency Response Plan are available in the office and offsite, and that key employees know its location. The Auditor will *verify* that all named persons on the ER distribution list have a current copy of the ER plan. The Auditor will *accept* verbal confirmation that the Emergency Response Plan is also kept offsite. For electronic copies onsite, the plan must be accessible at all times.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G3	This Emergency Response Plan has been reviewed, updated (if required) and dated within the past 12 months to ensure that it contains current updated information.	20	

G3 *Inspect* the documentation to see that the ER Plan has been reviewed within the past twelve months to ensure that it contains current updated information.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G4	<p>The operation has established a list of relevant phone numbers and contact persons that is accessible at or near telephones, which may include product suppliers, local emergency services and agencies, management, employees, owner and the poison control centre.</p> <p>Within the last 12 months, emergency response phone lists are verified and lists updated as required.</p> <p>Note: - Provincial Pesticide Act Regulations</p>	20	

G4 The Auditor will *observe* (usually posted and/or accessible near telephones) emergency telephone contacts clearly posted throughout the operation. These numbers may include those of product suppliers, local police, fire, ambulance, poison control centres, management and staff contact numbers. Lists should include date last updated.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G5	<p>Using the operation's ER Plan, the management has conducted the following:</p> <p>a) At least one table-top exercise on a simulated emergency annually.</p> <p>b) At least one physical drill on simulated emergency annually.</p>	10 20	

G5 The Auditor *inspects* records evidencing activities have taken place. Examples of a physical drill or simulated emergency could include a product spill, mock fire, medical emergency or flood. Where the owner is the sole operator, an exemption applies.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G6	<p>The fire detection system, including the heat detector or smoke detector device, is maintained and tested on an annual basis, and is in accordance with the manufacturer's, supplier's or monitoring station's written recommendations:</p> <p>a) Heat/smoke detectors; b) Communications and monitoring systems.</p>	Recommended	

G6 *Inspect* the written operating procedures for the operation and testing of the complete fire detection system. This must be a monitored 24 hour system. The Auditor will *examine* records for the past two years.

-AND-

The Auditor will *require* documentation that ensures the complete fire detection system has been maintained and tested in accordance with the manufacturer's written recommendations for:

- a) Heat/smoke detectors;
- b) Communications and monitoring systems.

Written verification from the monitoring company or supplier that annual maintenance is not required is acceptable.

NO.	PROTOCOL	Full Compliance Score	Actual Score
G7	<p>The security system, including the sensors and monitoring communications, is maintained and tested on an annual basis, and is in accordance with the manufacturer's, supplier's or monitoring station's written recommendations.</p>	Recommended	

G7 *Inspect* the written operating procedures for the operation and testing of the complete security system. This must be a continuously monitored system. The Auditor will *examine* records for the past two years.

-AND-

The Auditor will *require* documentation that ensures the complete security system has been maintained and tested in accordance with manufacturer's written recommendations.

Written verification from the monitoring company or supplier that annual maintenance is not required is acceptable.

G. EMERGENCY RESPONSE	Full Compliance Score	Actual Score
<p>SCORED ITEMS There is one mandatory protocol and two recommended protocols in this section.</p>	130	

DEFINITIONS

Accredited Seed Treatment Operation – a seed treatment operation that meets or exceeds the standards that have been issued by the Agrichemical Warehousing Association resulting in the issuance of accreditation status.

Scope of Accredited Seed Treatment Operation Standards – the standards apply to the storage of designated seed treatment products and the seed treatment application process as part of the operation. The standards do not apply to the storage of treated seed post application. Once accredited, sites will be required to comply with all protocols for all seed treatment activities included storage and treatment requirements for both designated and non-designated seed treatment products.

Seed Treatment Storage Area – a fixed area designated for the storage of designated seed treatment products that are currently not being actively used during the treatment process or are staged to be used in the future. This does not include treated seed.

Seed Treatment Area – a designated treatment area with two major components:

- a) Fixed area within (i.e. inside) a building structure that generally contains an auger, mixer, application equipment, mixing tanks and seed treatment product(s) staged to be used in the imminent future and
- b) External (i.e. outside) area (either permanent or temporary) where seed treatment activities occur with applicable seed treating equipment and seed treatment product(s) to be used in the imminent future.

Mobile Seed Treatment Unit – a seed treatment unit that generally contains an auger, mixer, application equipment and mixing tanks that is housed either on a trailer or truck for ease of transport.

In the event of a Mobile Seed Treating Unit to become Accredited there would be three areas that would need to be satisfied:

- a) Permanent seed treatment storage area (i.e. home site) if all the seed treatment product(s) are not stored on the mobile unit,
- b) Compartment on mobile unit designated for the storage of seed treatment product(s) (i.e. container or bulk tote) and
- c) Mixer, auger, application equipment and mixing tanks that are part of the mobile seed treatment unit.

Designated Seed Treatment Products – Designated seed treatment products are products designated by Canadian registrants for use in Canada. Effective January 1, 2017 only Accredited Seed Treatment Operators, certified under these standards, will be eligible to receive designated seed treatment products. As new seed treatment products are developed, the list of designated products will expand.

Occupancy – Occupancy refers to the categorization of structures (building/rooms) based on their usage. For purposes of these standards, seed treatment activities include within their occupancy, activities related to the seed treatment operation including treatment and bagging of seed.

Professional Judgment – Auditors are encouraged to gain knowledge and understanding of the seed treatment operations practices and base judgments and assessments as part of a consultative process to work with the seed treatment operation to achieve compliance with the standards.

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Issued: April 2016

NUMBER: 1

Grandfather Provisions

Introduction:

When the initial code was released in 2014, a period of time was allowed for seed treatment operations to seek grandfather status for specific sections of the code. Sites that were pre-audited prior to March 31, 2015 were eligible grandfathered designation. A record of this designation is held in the AWSA office. This grandfathering provision applies for protocols A1, A2, B2, B3, B7 and B10.

Conditions to maintain Grandfathered Designation:

- This designation is provisional upon the successful completion of a full audit by January 1, 2017
- Operations that lapse for more than 12 months will lose their grandfathered status.
- Renovation activities may impact grandfathered protocols (A1, A2, B2, B3, B7, B10). Operators should contact the AWSA office prior to initiating renovations for confirmation on the impact the planned renovations may have on their grandfathered status. Further expansion of the grandfathered condition will not be permitted.

Grandfathered Protocols:

Protocol A1

Protocol A1 stated:

All storage and fixed seed treatment areas are located at distances in excess of **30m** from environmentally sensitive areas.
Storage and fixed seed treatment areas pre-audited prior to March 31, 2015 were grandfathered with respect to the **30m** buffer. Confirmation of grandfathering approval is held on file by AWSA.

The grandfathering provision stated that for grandfathered operations located within 30m of environmentally sensitive areas, at the time of auditing for grandfather approval, written authorization and/or notice from local authorities having jurisdiction (i.e. local

planning authorities, or the Ministry of Environment) was provided. Where authorities had not provided written authorization, a receipt of the operation's request being sent to the authority having jurisdiction was provided.

Protocol A2

Protocol A2 stated:

All facilities are located at distances beyond established municipal flood plains (100 yr.). Existing sites pre-audited prior to March 31, 2015, were grandfathered with respect to the flood plain (100 yr.). Confirmation of grandfathering approval is held on file by AWSA.

The grandfathering provision stated that for grandfathered operations located within established municipal flood plans (100 yr.) at the time of auditing for grandfather approval, written authorization and/or notice from local authorities having jurisdiction (i.e. local planning authorities, or the Ministry of Environment) was provided. Where authorities had not provided written authorization, a receipt of the operation's request being sent to the authority have jurisdiction was provided.

Protocol B2

Protocol B2 stated:

- a. The exterior walls of the seed treatment area(s) are constructed to provide a minimum one-hour fire resistance rating or be constructed of non-combustible material. Seed treatment areas pre-audited prior to March 31, 2015 can be grandfathered and exempted from this provision.
- b. The seed treatment area(s), if enclosed within a building, must be separated from other occupancies by a permanent two-hour fire separation. Interior fire compartment separation wall openings are provided with self-closing doors and if applicable, fire dampers having resistance rating of 1.5 hours, including the frames.

The grandfathering provision stated that seed treatment areas pre-audited prior to March 31, 2015 could be grandfathered and exempted from this provision, with the exception of offices, lunchrooms and maintenance shops.

Seed treatment areas pre-audited prior to March 31, 2015 can be also grandfathered to allow for seed cleaning activities in the same area as the seed treatment area. Sites not grandfathered require separation, as outlined in Protocol B2, between the seed cleaning area and the seed treatment area.

Protocol B3

Protocol B3 stated:

For sites audited prior to March 31, 2015 windows could have been wired glass provided that they were not less than 6mm thick and mounted in fixed steel frames.

Protocol B7

Protocol B7 stated: The accredited area:

- c) The storage area has curbing 10 cm minimum in height around the perimeter or may be protected by a containment system incorporating floors sloped to a collection area that is 10 cm lower than the perimeter surface, and/or to drains leading only to a designed containment area specifically used for chemical spills;
- d) The seed treatment area has curbing 10 cm minimum in height around the perimeter or may be protected by a containment system incorporating floors sloped to a collection area that is 10 cm lower than the perimeter surface, and/or to drains leading only to a designed containment area specifically used for chemical spills.

The grandfathering provision stated that for sites pre-audited prior to March 31, 2015, that are protected by a containment system incorporating floor drains sloped to a containment area which is 10cm lower than the perimeter surface, and/or drains leading to a designed containment area for chemical spills, are grandfathered for this provision.

Protocol B10

Protocol B10 stated:

- a. Floors and floor support structures for the storage area must be constructed of non-combustible materials.
- b. Floors and floor support structures for seed treatment areas must be constructed of non-combustible materials.

The grandfathering provision stated that for clause B –for grandfathered seed treatment areas, which are constructed of combustible materials. If elevated, must have a minimum one-hour fire resistance rating on the underside of the supporting structure (floor), around the perimeter with solid barrier sheathing. If not elevated (i.e., the floor supports are resting on the ground), the floor does not require a fire resistance rating, nor is sheathing required around the perimeter.

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Revised: April 2016

NUMBER: 2

Fire Separation Requirements for Storage and/or Treatment Areas Enclosed Within Multiple Occupancy Buildings (Relating to Protocols B1 & B2)

Protocols B1 and B2 outline structural requirements for Storage (B1) and Seed Treatment (B2) areas. This bulletin is provided to clarify the fire separation requirements when storage and/or seed treatment areas are housed within a building with multiple occupancies.

Protocol B1 states:

*The **storage area(s)**, if enclosed within a building, must be separated from other occupancies by a permanent two-hour fire separation. Interior fire compartment separation wall openings are provided with self-closing doors and if applicable, fire dampers having resistance rating of 1.5 hours, including the frames.*

The definition of “other” occupancies could include the following: offices, maintenance shops, lunchrooms, or other areas, which may be physically occupied. This excludes occupancies associated with seed (treated or untreated) handling/storage processes.

Examples of incompatible occupancies/equipment include:

- Storage of power tools and/or storage of fuel powered equipment (which contain fuel)
- Sales/mercantile areas
- Feed storage

Protocols B2 states:

*The **seed treatment area(s)**, if enclosed within a building, must be separated from other occupancies by a permanent two-hour fire separation. Interior fire compartment separation wall openings are provided with self-closing doors and if applicable, fire dampers having resistance rating of 1.5 hours, including the frames.*

The seed treatment areas pre-audited prior to March 31, 2015 can be grandfathered and exempted from this provision, with the exception of offices, lunchrooms and maintenance shops

The definition of “other” occupancies could include the following: offices, maintenance shops, lunchrooms, or other areas which may be physically occupied. This excludes occupancies associated with seed (treated or untreated) handling/storage processes.

Examples of incompatible occupancies/equipment include:

- Storage of power tools and/or storage of fuel powered equipment (which contain fuel)
- Sales/mercantile areas
- Feed storage

The seed treatment areas pre-audited prior to March 31, 2015 can be grandfathered and exempted from this provision, with the exception of offices, lunchrooms and maintenance shops.

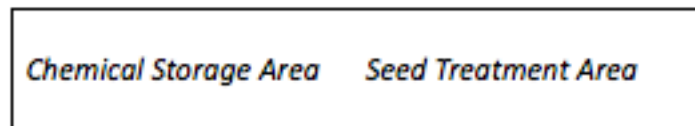
Seed treatment areas pre-audited prior to March 31, 2015 can be also grandfathered to allow for seed cleaning activities in the same area as the seed treatment area. Sites not grandfathered require separation, as outlined in Protocol B2, between the seed cleaning area and the seed treatment area.

Note: If the seed treatment area is seasonal, the storage area can be used for other purposes provided that no agrichemicals are present in the off-season. A SOP is required to evidence this procedure.

If as part of the seed treatment area there are augers (including belts) that protrude through established firewalls they will be viewed as exempt from requiring a damper or an alternative modification to achieve a fire rating.

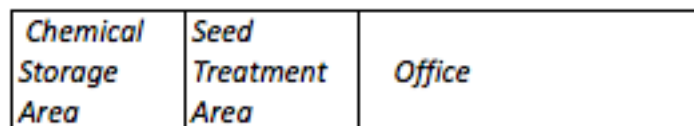
Interpretation examples:

Scenario 1:



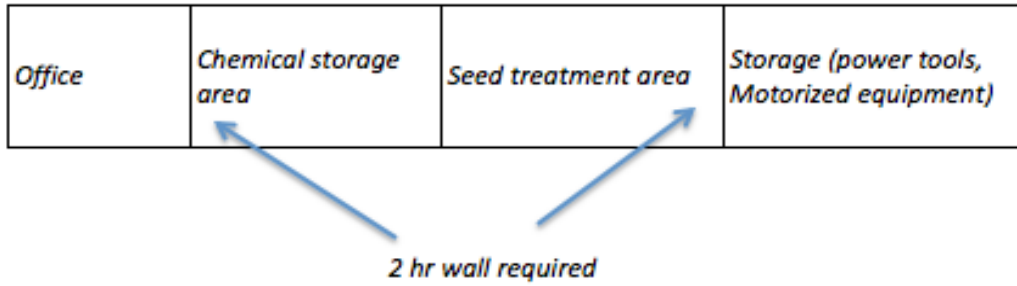
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A separate between the chemical storage area and seed treatment area is not required. Given the storage and treatment area is treated as one, the entire area must complete with the requirements for both storage and treatment.

Scenario 2.



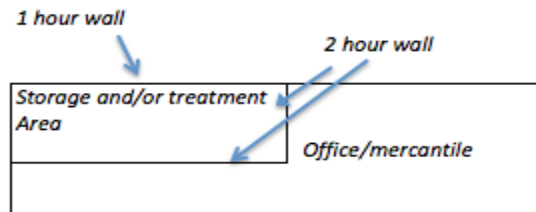
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. The wall between the Seed treatment area and the office must have a two-hour fire rating. The wall between the chemical storage area and seed treatment area is optional.

Scenario 3.



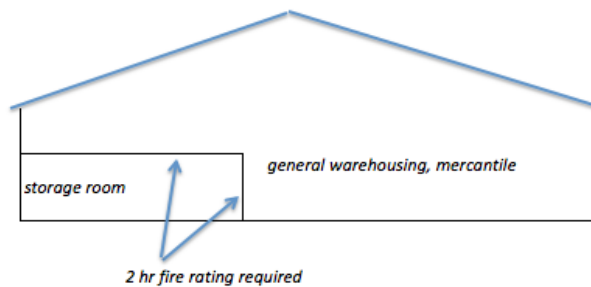
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A two-hour fire separation is required between the office area and the chemical storage area. A two-hour fire separation is also required to separate chemical storage area from the general storage area. This division can be the wall between the chemical storage area and the seed treatment area if the site is grandfathered. If the site is not grandfathered, a two-hour fire separation is required between the seed treatment area and the general storage area.

Scenario 4.



In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A two-hour fire separation is required between the office/Mercantile area and the chemical storage/treatment area.

Scenario 5.



In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A two-hour fire separation is required between the general warehouse/mercantile area and the chemical storage area. The ceiling of the storage room would require a two hours fire rating (both sides).

Construction Scenarios

Question/Scenario	Answer/Interpretation
Structural Steel framed warehouse. Does the addition of spray foam installation affect the fire rating of the wall assembly?	Documentation is required to evidence the fire rating of the spray foam installation.
For a wall assembly separating a mercantile area and a seed treatment and/or storage areas, is fire rating required on both side of the wall?	Fire rating is required on both sides of the wall
For a 1 or 2 hour fire wall assembly that is constructed of metal frame and drywall, does the additional of plywood to the drywall (to protect from damage) affect the fire rating of the wall?	Yes, the plywood would lessen the fire rating of the wall assembly.
When a treatment area is enclosed within a building and there is an opening through which an auger runs to load trucks outside, what is required to maintain a 1-hour fire rating?	Exterior doors and windows do not require fire rating; consequently rating around pass through is not required. Fire rating would be required for openings in interior fire separation walls.
For interior firewalls – how high must they be?	For interior fire walls, the 2 hours wall assembly must go up to the roof, unless the storage and/or treatment areas are fire compartments (i.e. the walls and the ceiling have a two hour rating (see scenario #5)).

AID FOR SITES TO DETERMINE APPLICABILITY OF STANDARDS

Note: This chart is to be used as a guide for facilities to assess each protocol's applicability. Due to the dynamic nature of seed treatment facilities not all of the protocols may be applicable based on individual operation activities.

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
A1	Mandatory	X	X	X	X	-	-
A2	Mandatory	X	X	X	X	-	-
A3	Mandatory	X	X		X	-	-
A4	10	X	X	-	X	-	-
A5	10	X	X	X	X	-	-
A6	10	X	X	-	X	X	X
A7	20	X	X	X	X	X	X
A8	60	X	X	-	X	X	X

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
B1 a	Mandatory	X	-	-	X	-	-
B1 b	Mandatory	X	-	-	X	-	-
B2 a	Mandatory	-	X	-	-	-	-
B2 b	Mandatory	-	X	-	-	-	-
B3	20	X	X	-	X	-	-
B4	Mandatory	X	X	-	X	-	-
B5	20	X	X	-	X	-	-
B6	20	X	X	-	X	-	-
B7 a	Mandatory	X	-	-	X	X	-
B7 b	30	-	X	X	-	-	X
B8a	30	X	-	-	X	X	-
B8 b	Mandatory	X	-	-	X	X	-
B9 a	30	-	X	X	-	-	X
B9 b	Mandatory	-	X	X	-	-	X
B10 a	Mandatory	X	-	-	X	X	-
B10 b	30	-	X	-	-	-	-
B11	Mandatory	X	X	-	X	X	-
B12	Mandatory	X	-	-	X	-	-
B13	Mandatory	-	X	-	-	-	-
B14	10	X	-	-	X	-	-
B15	Mandatory	X	X	-	X	-	-
B16	Mandatory	X	X	X	X	X	X
B17 a	20	X	X	X	X	-	-
B17 b	20	X	X	X	X	-	-
B17 c	Mandatory	-	-	-	-	X	X
B18 a	Mandatory	-	X	X	-	-	X
B18 b	20	-	X	X	-	-	X
B19	Recommend	X	X	-	X	-	-
B20	Recommend	X	X	-	X	-	-

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
C1	Mandatory	X	X	X	X	-	-
C2	120	X	X	X	X	X	X
C3	Mandatory	X	X	X	X	X	X
C4	Mandatory	X	X	X	X	X	X
C5	20	X	X	X	X	-	-
C6	10	X	X	-	X	-	-
C7	10	X	X	X	X	X	X
C8	Mandatory	X	X	X	X	X	X
C9	Mandatory	X	X	X	X	X	X
C10	20	X	X	X	X	X	-
C11	Mandatory	X	X	X	X	-	-
C12	Mandatory	-	X	X	-	-	X

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
D1	Mandatory	X	X	X	X	X	X
D2	Mandatory	X	X	X	X	X	X
D3	Mandatory	X	X	X	X	X	X
D4	Mandatory	X	X	X	X	X	X
D5	Mandatory	X	X	X	X	X	X
D6	Mandatory	X	X	X	X	X	X
D7	Mandatory	X	X	X	X	X	X
D8	100	X	X	X	X	X	X
D9	Mandatory	X	X	X	X	X	X
D10	Mandatory	X	X	X	X	X	X

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
E1	Mandatory	X	X	X	X	-	-
E2	Mandatory	X	X	X	X	-	-
E3	Mandatory	X	X	X	X	-	-
E4	30	-	X	X	-	-	X
E5	Mandatory	X	X	X	X	X	X
E6	30	X	X	-	X	-	-
E7	Mandatory	-	X	X	-	-	X
E8	Mandatory	X	X	X	X	X	X

E9	Mandatory	X	X	X	X	X	X
E10	60	X	X	X	X	X	X
E11	20	X	-	-	X	X	-
E12	20	X	-	-	X	X	-
E13 a	10	X	X	X	X	X	X
E13 b	Mandatory	X	X	X	X	X	X
E14	20	X	X	X	X	X	X
E15	20	X	X	X	X	X	X
E16	Mandatory	-	X	X	X	X	X

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
F1	20	X	X	X	X	X	X
F2	50	X	X	X	X	X	X
F3	40	X	X	X	X	X	X
F4	20	X	X	X	X	X	X
F5	10	X	X	X	X	X	X
F6	40	X	X	X	X	X	X
F7	20	X	X	X	X	X	X

Protocol	Compliance	Seed Treatment Storage Area	Seed Treatment Application Area (Inside)	Seed Treatment Application Area (Outside)	Mobile Seed Treater (permanent storage)	Mobile Seed Treater (mobile storage)	Mobile Seed Treatment Application (mobile treater)
G1	Mandatory	X	X	X	X	X	X
G2	60	X	X	X	X	X	X
G3	20	X	X	X	X	X	X
G4	20	X	X	X	X	-	-
G5	30	X	X	X	X	X	X
G6	Recommend	X	X	-	X	-	-
G7	Recommend	X	X	-	X	-	-

