

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

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A. Code Applicability for Mobile Seed Treater Scenarios B. Documentation and Auditing of Mobile Seed Treaters

A: Code Applicability for Mobile Seed Treater Scenarios

A number of various scenarios are evident for the operation, management and control of mobile seed treaters. This Bulletin outlines a number of scenarios and identifies the certification requirements for those who have direct control and management of the seed treater, those operating the seed treater and those entities who provide seed treatment product(s) to mobile seed treaters.

In all scenarios the entity that has direct control over the management and seed treatment application processes is required to be certified under the Accredited Seed Treatment Operation Standards.

- 1. Ag-retail location using 3rd party treating equipment, but ag-retail location staff operate the application equipment.**
 - The ag-retail has direct management and control of the seed treatment process. The ag-retail facility must be certified and meet all applicable protocols.
- 2. Ag-retail location staff advertise 3rd party (application equipment and staff) that treats seed.**
 - The 3rd party has direct management and control of the seed treatment process. The 3rd party seed treatment operation must be certified and meet all applicable protocols.
 - In situations where the ag-retail site MAY be responsible for ensuring seed treatment product(s) are stored in accordance with the protocols as part of business relationship with the 3rd party. It is the responsibility of both the 3rd party (seed treatment operator) and ag-retail location to document specific responsibilities of both parties to ensure that all applicable protocols are adhered to and provide documentable evidence as part of the 3rd party seed treatment operation audit.
 - The 3rd party is ultimately responsible to ensure that all applicable protocols are adhered to and clearly documented.
- 3. Ag-retail location advertising 3rd party contractor (equipment and staff) to treat seed at ag-retail location.**
 - The 3rd party has direct management and control of the seed treatment process. The 3rd party seed treatment operation must be certified and meet all applicable protocols.
 - In situations where the ag-retail site MAY be responsible for ensuring seed treatment product(s) are stored in accordance with the protocols as part of business relationship with the 3rd party. It is the responsibility of both the 3rd party (seed treatment operator) and ag-retail location to document specific responsibilities of both parties to ensure that all applicable protocols are adhered to and provide documentable evidence as part of the 3rd party seed treatment operation audit.

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- The 3rd party is ultimately responsible to ensure that all applicable protocols are adhered to and clearly documented.
- 4. Ag-retail location treat seed on-site with ag-retail location staff and application equipment.**
 - The ag-retail site has direct management and control of the seed treatment process. The ag-retail facility must be certified and meet all applicable protocols.
 - 5. Ag-retail location treat seed off-site with ag-retail location staff and application equipment.**
 - The ag-retail site has direct management and control of the seed treatment process. The ag-retail facility must be certified and meet all applicable protocols.
 - 6. Ag-retail location advertises seed treatment services with ag-retail owned mobile treater with 3rd party hired applicator.**
 - The ag-retail has direct management and control of the seed treatment process. The ag-retail facility must be certified and meet all applicable protocols.
 - All individuals actively treating seed would need to be trained accordingly including applicable operating procedures, emergency response preparedness and personal protective equipment requirements. As part of the audit process that auditor would look for documentation that provides evidence that training has occurred and that applicable protocols are adhered to by the 3rd party applicator(s) in addition to all other applicable protocols.
 - 7. Ag-retail location owns seed treating equipment and provides application equipment to producer for self-application of seed treatment product(s).**
 - The ag-retail has direct management and control of the seed treatment process. The ag-retail facility must be certified and meet all applicable protocols.
 - All individuals actively treating seed would need to be trained accordingly including applicable operating procedures, emergency response preparedness and personal protective equipment requirements. As part of the audit process that auditor would look for documentation that provides evidence that training has occurred and that protocols are adhered to by the applicator(s) in addition to all other application protocols.
 - 8. Ag-retail location supplies seed treatment product(s) to 3rd party seed treater (equipment and staff).**
 - The 3rd party has direct management and control of the seed treatment process. The 3rd party seed treatment operation must be certified and meet all applicable protocols.
 - The 3rd party is ultimately responsible to ensure that all applicable protocols are adhered to and clearly documented.
 - The obligation of the ag-retail location supplying seed treatment product(s) to any 3rd party treater is to ensure that the treater is certified and in good standing. A current list of certified seed treatment facilities is available from AWSA and is available online at www.awsa.ca

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9. Producer purchases seed treatment product(s) from Ag-retailer, hires 3rd party seed treater to apply seed treatment product(s) on-farm.

- The 3rd party has direct control of the seed treatment application process. Is treating seed for sale/gain and must be certified and meet all applicable protocols.
- Ag-retail location when selling/shipping product to producer should ensure the purchase waiver outlining the applicability of the Accredited Seed Treatment Operation Standards for on-farm application situations undertaken by a commercial seed treatment applicator is adhered to.

If there are situations that the preceding Bulletin does not clearly address it is the responsibility of the entity that has direct control over the management and seed treatment application process to contact the AWSA office to seek further clarification on the specific scenario for auditing purposes.

B. Documentation and Auditing of Mobile Seed Treaters

As a component of the audit process for the operation, management and control of mobile seed treaters the following criteria must be met:

- 1. ALL mobile seed treaters under control/management of the operator are required to be inspected and logged as part of the operational audit process.**
- 2. Upon completion of a successful audit each mobile treatment unit will be identified by a unique tracking number (as specified by the operator – i.e. treater #1, treater #2, etc.).**
 - Certification stickers will be provided by the auditor to the operator to be placed on the mobile treaters indicating the unique tracking number and re-audit date.
- 3. It is the responsibility of the operator/manager to ensure that all newly acquired mobile seed treaters successfully complete an audit prior to use.**
 - The addition of a newly acquired mobile seed treater does not trigger a complete operational audit in the interim between the biennial audit cycle. Only the newly acquired mobile seed treater is required to be assessed as part of the audit.

In all scenarios the entity that has direct control over the management and seed treatment application processes is required to be certified under the Accredited Seed Treatment Operation Standards.

For reference, pages 54 – 56 of the Accredited Seed Treatment Operation Standards (2016) manual outlines which protocols apply to mobile seed treaters.