



Agrichemical Warehousing Standards Association

ACCREDITED SEED TREATMENT OPERATION STANDARDS

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Accredited Seed Treatment Operation Standards Audit Protocol Guide

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Company Name: _____

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Audit Date: _____

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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 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 manager@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 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 Seeds Canada 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 access PCP seed treatment products registered 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 2020, it is required to be re-audited within calendar year 2022 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 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 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; and
3. 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.

QUALITY ASSURANCE AUDITS

To ensure compliance with the Standards and to help identify opportunities for continuous improvement, quality assurance audits are conducted. At the discretion of AWSA, Auditors will visit certified sites, unannounced, to complete these condensed audits. These audits are at no cost to the operator. A quality assurance report will be provided. If deficiencies are noted, corrective action steps, within defined time frames, will be prescribed (Reference Compliance and Enforcement Policy and Appeals Policy).

COMPLIANCE AUDIT AND CERTIFICATION TERMS AND CONDITIONS

Prior to the issuance of a certificate of compliance, sites will be required to electronically review and agree to the following terms and conditions of the compliance audit and certification.

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:

- a) 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;
- b) 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;
- c) 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 Program managers as the AWSA may designate from time to time;
- d) 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;
- e) 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;
- f) 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 Program 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;
- g) 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;
- h) The operator understands that non-compliance with the standards will result in the cessation of shipments of seed treatment products by manufacturers and distributors in Canada;
- i) Operator agrees to share data for the purposes of seeking and maintaining certification. All data collected will be maintained in compliance with AWSA's data collection policy. A list of certificate holders will be made available to AWSA certified Ag-retailers for the purposes of confirming certification.

COMPLIANCE & ENFORCEMENT

1. Complainant notifies AWSA

A written complaint is to be sent to AWSA c/o Program Manager by e-mail to manager@awsa.ca. The complainant is to outline details of the alleged non-compliance infraction. The Program Manager will respect the confidentiality of the complainant.

2. Qualification Process:

- AWSA to send an AWSA Auditor to the site to check all details.
- As a working goal, the complaint is to be addressed within three working days.
- Program Manager makes final recommendation to AWSA management.
- AWSA to notify complainant on or before the fourth working day as to status.

3. Resolution Process:

First Offence

- Operator has three working days to undertake and complete corrective action.
- Operator to confirm issue corrected in writing.
- Infraction record remains on file for two years from date of infraction.
- If situation is not corrected within three working days, certification is withdrawn, and manufacturers/distributors are notified. A complete re-audit is required at the operators' expense. Recertification is issued following a successful audit. Infraction record remains on file for two years from date of infraction.
- AWSA has option for second auditor visit to confirm compliance.
- Unannounced audits will be performed at AWSA's expense the following year.

Second Offence (same operation, same violation, within a 2-year period (730 days) from 1st offence)

- A fine of \$5,000.00 is levied and payment is due in 30 days.
- Operator has three working days to undertake and complete corrective action.
- Operator to confirm issue corrected in writing.
- Infraction record remains on file for two years from date of second infraction.
- If situation is not corrected within three working days, certification is withdrawn, and manufacturers/distributors are notified. A complete re-audit is required at the operators' expense. Recertification is issued following a successful audit. Infraction record remains on file for two years from date of second infraction.
- All manufacturers & distributors advised of second offence.
- AWSA has option for second auditor visit to confirm compliance. Follow up visits will be unannounced.
- Unannounced audits will be performed at AWSA's expense within the following 2 years.

Third Offence (same operation, same violation, within a 2-year period (730 days) from 2nd offence)

- A fine of \$10,000.00 is levied and payment is due is 30 days
- Operator has three working days to undertake and complete corrective action.
- Operator to confirm issue corrected in writing.
- Infraction record remains on file for two years from date of second infraction.
- If situation is not corrected within three working days, certification is withdrawn and manufacturers/distributors are notified. A complete re-audit is required at the operators' expense. Recertification is issued following a successful audit. Infraction record remains on file for two years from date of second infraction.
- All manufacturers & distributors advised of second offence.
- AWSA has option for second auditor visit to confirm compliance. Follow up visits will be unannounced.
- Unannounced audits will be performed at AWSA's expense the following years

Fourth Offence (same operation, same violation, within a 2-year period (730 days) from 3rd offence)

- Certification immediately withdrawn for 547 days (1.5 years), no three-day grace period. Manufacturers immediately notified that operator is ineligible for receipt for seed treatment products. Following 547 days, a complete re-audit is required at the operators' expense. Recertification issued following a successful audit.

Example:

1. Operation has verified complaint on May 1, 2017 (but rectified within three working days).
2. 1st infraction on file until April 30, 2019.
3. 2nd infraction committed (same protocols) on May 1, 2018 (but rectified in three working days). Operation now in 2nd infraction status which is on file for two years from date of second infraction (until April 30, 2020). A \$5,000.00 fine is levied.
4. 3rd infraction committed (same protocol) on February 15, 2019 (but rectified in three working days). Operation now in 3rd infraction status which is on file for two years from date of third infraction (until February 14, 2021). A \$10,000.00 fine is levied.
5. If operation has 4th infraction (same protocol) between February 15, 2019 and February 14, 2021 certification is withdrawn for a 547 day period and all manufacturers/distributors are notified.

AWSA AUDIT APPEALS PROCESS

Part A: AWSA Audit Interpretation Appeals Process

This Process applies to interpretation discrepancies of the standards between certified operations and AWSA representatives

1. During the audit process, Audited Operations are first encouraged to resolve any uncertainties or disagreements with an AWSA Auditor. The AWSA Senior Auditor and/or AWSA Program Manager may be consulted for assistance in the interpretation and application of the standards.
2. The Audited Operation may request a review by the AWSA Senior Auditor, who may recommend to the AWSA Program Manager to amend the audit decision. This review is a pre-requisite to a formal appeal to the AWSA Appeals Committee.
3. If AWSA has issued notification that the certification be declined or withdrawn, the Audited Operation (“Appellant”) may appeal by submitting a written statement to the AWSA Program Manager explaining the circumstances and grounds for appeal.
 - a. This request shall be sent via registered mail or via email (manager@awsa.ca);
 - b. 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 reimbursed; and
 - c. In the event of an appeal of the AWSA Senior Auditor’s decision, the withdrawal of certification will not proceed until the appeal has been determined.
4. The AWSA Program Manager will require a written report, including supporting documentation concerning the matter(s) under appeal from the Appellant and AWSA Senior Auditor. The reports will be forwarded to the AWSA Appeals Committee.
5. The hearing of the AWSA Appeals Committee shall:
 - a. Consist of the AWSA Board Chair, AWSA Executive Director, AWSA Program Manager and may include additional AWSA Board members at the discretion of the Board Chair;
 - b. Appeals Committee members will be screened to ensure conflicts of interests do not exist;
 - c. Be provided a copy of the written reports submitted by the Appellant under appeal;
 - d. Be provided a copy of the report of the AWSA Senior Auditor to the Appellant;
 - e. Shall invite the AWSA Senior Auditor and the Appellant to submit any further information within five working days of receiving the invitation;

- f. May review the relevant matter with the AWSA Senior Auditor and the Appellant either in person, via telephone or in writing;
 - g. May seek out additional regulatory or professional opinions to consider as part of the appeals process;
 - h. Shall render a decision on the appeal as expeditiously as possible while respecting the principles of procedural fairness and public safety
 - i. Shall report back to the Appellant on the status of the appeal every ten business days until a final decision is rendered,
 - j. The Appeals Committee will provide a final record of decision to the AWSA Program Manager for furtherance to the Appellant; and
 - k. The AWSA Appeals Committee at their discretion may reimburse the appeal fee where the Appellant has raised a significant issue that has industry wide significance that results in clarification of the standards.
6. In the event that the withdrawal or declination of certification is confirmed upon appeal, the withdrawal of certification will be in effect at such a time as the operation receives formal correspondence from the AWSA Program Manager and will be in effect until such time as the Audited Operation completes an audit receiving confirmation of compliance with the standards from an AWSA Auditor.

Part B: AWSA Appeals for Standards Variance

This process applies to requests for consideration for a variance to a specific protocol within the standard either for a period of time or indefinitely.

Periodically Audited Operations may seek consideration for a variance to a specific protocol within the standard either for a period of time or indefinitely. The process to request a protocol variance is as follows:

1. Contact the AWSA Program Manager to complete the Variance Request Form to identify the following:
 - a. The specific protocol(s) within the standards that the variance request is applicable to;
 - b. The current operational situation as it relates to the specific protocol(s) identified;
 - c. Changes to the operational situation that are anticipated or planned with relative time required to complete;
 - d. Rationale for the variance request (such as financial hardship, construction scheduling, operational efficiency, timeline extensions, etc.);
 - e. Ruling from local building inspector, fire chief or other regulatory authority of relevance to the specific protocol(s) identified;
 - f. Additional information that the Audited Operation site management feel would aid in the decision-making process;

- g. The Audited Operation and AWSA Auditor may choose to consult the AWSA Program Manager for assistance in the interpretation and application of the standards;
 - h. Formal correspondence of the variance request decision will be provided by the AWSA Program Manager to the Audited Operation seeking variance consideration within ten working days of receipt. If a decision has not be finalized after the initial ten business days a status update will be issued every ten business days until a final decision is rendered; and
 - i. AWSA shall render a decision as expeditiously as possible while respecting the principles of procedural fairness and public safety.
2. If the Variance Request is denied the Audited Operation may choose to enact the AWSA Audit Appeals Process.

Part C: AWSA Compliance & Enforcement Appeals Process

This Process applies to appeals related to corrective action requirements issued to Audited Operations or for appeals related to issuance of notices of violations to Audited Operations.

1. During the Compliance and Enforcement process, Audited Operations are first encouraged to resolve any uncertainties or disagreements with an AWSA Auditor that is performing the AWSA Compliance Assessment. The AWSA Senior Auditor and/or AWSA Program Manager may be consulted for assistance in the interpretation and application of the standards.
2. Following the initial and any subsequent AWSA Compliance Assessments, Audited Operations will be provided a reasonable period of time to correct identified area(s) of non-compliance before certification is withdrawn based on the AWSA Auditor's assessment and confirmation from the AWSA Program Manager on the specific time required to correct the deficiency.
3. If the Audited Operation has been issued notification that the certification will be withdrawn, the Audited Operation ("Appellant") may appeal the actions identified in the Compliance Assessment by submitting a written statement including supporting documentation concerning the matter(s) under appeal to the AWSA Program Manager via registered mail or via email (manager@awsa.ca) explaining the circumstances and grounds for appeal. At that point the formal AWSA Appeals Process will be enacted.

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 current edition of 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 Program manager of change in ownership upon closing of purchase/transfer agreement;
2. Upon receipt of ownership change notification, the Program manager will forward an "Compliance Audit and Certification Terms and Conditions" 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.

POLICY ON JUST IN TIME SEED TREATMENT PRODUCT ACQUISITION

Accredited Operators without designated storage areas for seed treatment products can acquire seed treatment products for on time application. In this situation a safe operating procedure (SOP) is required which limits product on hand to a one-day supply; or multiple days provided there are no extra containers of seed treatment product being stored (i.e., product is not "in use".) "In use" is defined as being attached to the seed treater. In the event that the operator is using multiple products, some of each product could be on-hand and considered in use and would be stored within the containment area.

For audit evidence, the Auditor will look for a SOP and documentation (agreement/ acknowledgement) from their chosen retailer that this process is in place and fully understood. This documentation would need to be updated annually. At no point should there be extra totes/jugs of seed treatment product be in storage.

SCOPE OF ACCREDITED SEED TREATMENT OPERATION STANDARDS

The standards apply to the storage of PCP regulated 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 PCP regulated seed treatment products.

There are no restrictions on shipments of seed treatment products to farmers for on-farm seed treatment to be applied exclusively within their farming operation. If a farmer is contracting a 3rd party applicator to treat seed, the 3rd party applicator must be an Accredited Seed Treatment Operation. Farmers will be required to complete a waiver with their ag-retailer(s) to access seed treatment products (reference Bulletin #9).

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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
A1	All storage and fixed seed treatment areas are located at distances in excess of 30m from environmentally sensitive areas. <u>Note:</u> - Provincial Pesticide Act Regulation	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.

For storage and fixed seed treatment areas that were pre-audited prior to March 31, 2015 and grandfathered with respect to the **30m** buffer, confirmation of grandfathering approval is held on file by AWSA.

Reference: Bulletin #1 - Grandfathering

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

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
A3	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. <u>Note:</u> - Fire Code Regulation/National Building Code	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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
A4	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). <u>Note:</u> - National Building Code	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.

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

- A5** During the site examination the Auditor will *determine* that the parking lot(s) will not obstruct passage of fire and emergency vehicles. (Reference Protocol A3).

<u>NO.</u>	<u>PROTOCOL</u>	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. If rollup doors are the primary access points, warning signage is required.

<u>NO.</u>	<u>PROTOCOL</u>	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: <ul style="list-style-type: none"> 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	

SECTION B – BUILDING STRUCTURE AND EQUIPMENT

Auditors will *examine* physical attributes of the **structure and equipment used/installed** in its operations that could pertain to either the building or the area within a building used for seed treatment and seed treatment product(s) storage processes.

Using *professional judgment*, the **National Building, Fire and Electrical Codes** (except where provincial codes exist) and the Protocol, Auditors will *determine* **application and compliance**.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B1	<p>a. The storage area(s) exterior walls are constructed to provide a minimum <u>one-hour</u> fire resistance rating or are of non-combustible material.</p> <p>b. The storage area(s), if enclosed within a building, must be <u>separated</u> from other occupancies by a permanent two-hour fire separation. Interior fire compartment separation wall openings are provided with self-closing doors having resistance rating of 1.5 hours, including the frames.</p>	<p>Mandatory</p> <p>Mandatory</p>	

B1 The Auditor will *confirm* this by physical examination. If the storage area is a separate storage area (room) within a larger building then the area must be separated from other occupancies by a permanent two-hour fire separation. The auditor will *observe* the ratings on all doorframes. Roll up fire doors require fuseable links/activation devices on both sides of the opening.

The definition of “other” occupancies could include the following: offices, maintenance shops, lunchrooms, or other areas which may be physically occupied. The Auditor will *confirm* by physical examination. Reference Bulletin # 2.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B2	<p>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.</p> <p>b. The seed treatment area(s), if enclosed within a building, must be <u>separated</u> 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.</p> <p><u>Note:</u> - National Fire Code</p>	<p>Mandatory</p> <p>Mandatory</p>	

B2 The definition of “other” occupancies could include the following: offices, maintenance shops, lunchrooms, or other areas which may be physically occupied. The Auditor will *confirm* by physical examination.

Reference: Bulletin # 1 – Grandfathering. Bulletin # 2 – Occupancy and separation scenarios.

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. Automatic fire shutters are acceptable in lieu of wired glass.

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.

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 a containment system in place to contain volumes of spilled liquids.</p> <p>b) The <u>seed treatment area</u> has a containment system in place to contain volumes of spilled liquids.</p> <p><u>Note:</u> - Provincial Pesticide Act Regulation</p>	<p>Mandatory</p> <p>Mandatory</p>	

B7 Containment can be achieved by a variety of methods. The auditor will determine if the accredited areas are protected by retention curbing or is a designed containment system.

- Concrete or metal containment (spill pans) areas are to include retention curbing that is a minimum of 10 cm height around the perimeter. If the curbing is made of angle iron or concrete that is not a single pour, caulking which is impervious to chemical spill absorption must be applied to ensure that spills cannot seep out through a crack. Angle iron must be made of sufficient gauge in order to prevent damage during routine operations or is firmly affixed to a wall.
- Accredited areas 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.
- Multi-floor storage/treatment areas need curbing on all levels.
- Baffled spill pallets are acceptable as a means of containment. If baffled spill containment pallets are used as a means of containment the following must be achieved:
 - The baffled pallets must be constructed of a chemical resistant material.
 - The baffled pallets must be crack free.
 - Annual inspection is required as part of the overall site's safe operating procedures.
 - There must be at a minimum 110% spill containment capacity of the largest container on the pallet.
- Portable containment berms are an acceptable means of containment for mobile seed treaters. If portable berms are used as a means of containment for mobile treaters the following must be achieved:
 - The berm must be constructed of a chemical resistant material,
 - Have curbing a minimum of 10 cm height around the perimeter.
 - The berm must be free of any signs of damage or wear.
 - Annual inspection is required as part of the overall site's safe operating procedures.
- Containment for seed treatment area must be encompass all areas where product is being applied and housed. For example – containment must be present under totes, hose connection points and under the active product application area.

Reference: Bulletin # 1 – Grandfathering and the Policy on Renovation of Accredited Operations
Reference: Bulletin # 4 – Guidelines for Portable Storage Containers (inter-modal) Conversion.

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> <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>	<p>30</p> <p>Mandatory</p>	

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><u>Note:</u> - 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.

For mobile treaters with portable containment ponds, the Auditor will *use professional judgment* to determine if the containment pond is in good condition and will require documentation that shows maintenance has been done in accordance with manufacturers recommendations.

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

B10 Floors and floor support structures must be non-combustible.

Reference Bulletin #1 for Grandfathered provisions and the Policy on Renovation of Accredited Operations.
 Reference: Bulletin # 4 – Guidelines for Portable Storage Containers (inter-modal) Conversion.

NO.	PROTOCOL	Full Compliance Score	Actual Score
B11	The accredited areas (both storage and seed treatment) do not have any active floor drains. <u>Note:</u> - Provincial Pesticide Act Regulation	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	The <u>storage area</u> has active mechanical ventilation designed to provide a minimum of two air changes/hr when the area is occupied.	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: $\frac{\text{Length} \times \text{width} \times \text{height}}{30} = \text{minimum CFM requirement}$

30

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

30

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 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.

<u>NO.</u>	<u>PROTOCOL</u>	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; b) A properly secured fire extinguisher is installed on each forklift; c) A properly secured fire extinguisher is installed on the mobile seed treatment unit.	20 20 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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
B18	Seed treatment equipment: 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	Mandatory 20	

B18 *Visual inspection of seed treatment equipment.*

<u>NO.</u>	<u>PROTOCOL</u>	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* current documentation (within the last 12 months) for the fire detection and monitoring system to verify that it provides 24-hour protection for the entire structure.

<u>NO.</u>	<u>PROTOCOL</u>	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* current documentation (within the last 12 months) for the fire detection and monitoring system and to verify that it provides 24-hour protection for the entire structure.

B. STRUCTURAL	Full Compliance Score	Actual Score
SCORED ITEMS There are 18 Mandatory and 2 Recommended protocols in this section.	190	

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>a) 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> <p>b) First aid kit; 30</p> <p>c) Eyewash station or eyewash shower 30</p> <p>d) Sealable salvage container (over pack); 10</p> <p>e) Both absorbent/neutralizing materials as per MSDS/SDS; 10</p> <p>f) Aluminum shovel and a broom; 10</p> <p>g) PPE (including: gloves, goggles, coveralls and rubber boots); 10</p> <p>h) Respirator and chemical cartridge(s) (if applicable – product specific). 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 supplier label, or workplace label, or a label regulated by the Pest Control Products (PCP) Act, which makes the reader aware of the potential hazards and risks when handling and using seed treatment products.</p> <p><u>Note:</u> - Provincial Pesticide Act Regulation</p>	Mandatory	

- C3** The Auditor will *examine* products in the accredited areas. Each regulated (WHMIS, TDG, PCP) seed treatment product will have an applicable label.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
C4	All treated seed is labeled in accordance with regulatory requirements. <u>Note:</u> 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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
C10	<p>Empty seed treatment containers are:</p> <p>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;</p> <p>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.</p>	<p>10</p> <p>10</p>	

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). For sites where the owner is the sole operator, written rules are required.

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. Exemption where the owner is the sole operator.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
D3	All personnel 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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
D4	WHMIS training has been provided for all personnel handling seed treatment products.	Mandatory	

D4 Federal and Provincial regulations require that WHMIS training be provided to personnel 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).

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
D5	Seed treatment product label training (i.e., comprehension) has been provided for all personnel 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	<p>An individual who is responsible for the seed treatment operation has obtained provincial seed treatment operator certification (if applicable—refer to provincial requirements).</p> <p>Note: - Provincial Pesticide Act Regulation (if applicable).</p>	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. Training must also include instruction specific to the class of forklift being operated. Note – Includes electric motor hand or hand-rider trucks.

NO.	PROTOCOL	Full Compliance Score	Actual Score
D8	<p>For all employees working within the seed treatment operation, the site has developed and implemented an environmental health and safety training program applicable to their work. Training will consist of:</p> <ul style="list-style-type: none"> 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. 	Mandatory	

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-and D are exempt.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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. For sites where the owner is the sole operator, b) applies.

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

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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
E3	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. <u>Note:</u> - Provincial Environmental Requirement may exceed the protocol requirement	Mandatory	

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

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
E4	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.	30	

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

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
E5	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. <u>Note:</u> - Electrical Code	Mandatory	

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

<u>NO.</u>	<u>PROTOCOL</u>	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> <p>a) Heating system; b) Forklift trucks; c) Ventilation systems; d) Dock levelers.</p>	<p>10 10 10 10</p>	

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

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
E7	<p>This operation has <u>written</u> procedures for maintenance:</p> <p>a) Bagging and/or bulk handling equipment; b) Care and use of seed treatment equipment; c) Containment inspection and maintenance.</p>	Mandatory	

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

<u>NO.</u>	<u>PROTOCOL</u>	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> <p>a) First aid kit; b) Eyewash station; c) Fire extinguishers; d) Personal protection equipment; e) Spill cleanup equipment and supplies.</p>	Mandatory	

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

<u>NO.</u>	<u>PROTOCOL</u>	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.

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

E10 a) *Verify* with the operator the availability of 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 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.

<u>NO.</u>	<u>PROTOCOL</u>	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 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><u>Note:</u> - 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 monthly while the accredited area is occupied and/or seed treatment products are being stored.</p> <p>b) The current annual certified inspection tag must be attached to the fire extinguisher.</p> <p><u>Note:</u> - 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	<p>The operation has established a standard written operating procedure requiring all accidents/incidents be investigated, recorded and reported.</p> <p><u>Note:</u> - CSA Z1005 Incident Investigation Standard</p>	Mandatory	

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

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	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 ten mandatory protocols in this section.	200	

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.

<u>NO.</u>	<u>PROTOCOL</u>	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?

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

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?

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
F3	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: 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.	10 10 10 10	

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

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

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

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

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

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

F7 Sample Questions:
a) What is the daily inspection procedure (circle check)?
b) What is the proper procedure to drive a loaded forklift down an incline?
c) Describe the safe refueling procedure for the forklift.
d) Describe the position of the forks when traveling forward empty.

F.	EMPLOYEE KNOWLEDGE	Full Compliance Score	Actual Score
	SCORED ITEMS There are no mandatory protocols in this section.	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 dated index that references page numbers and an organizational chart.</p> <p>The 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, and product suppliers; 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; 	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 on the mobile unit and is stored in a weatherproof 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.

<u>NO.</u>	<u>PROTOCOL</u>	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.

<u>NO.</u>	<u>PROTOCOL</u>	Full Compliance Score	Actual Score
G4	<p>The operation has established a list of relevant phone numbers and contact persons that is prominently displayed, 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 prominently 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.

<u>NO.</u>	<u>PROTOCOL</u>	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. Drill exercises must include an event which activates the ER plan. 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 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 all seed treatment products.

Seed Treatment Storage Area – a fixed area designated for the storage of 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.

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.

Outdoor Treatment Area – For clarity, outdoor treatment areas are defined as not being inside a structure. If it has a wall or 2 for a windbreak purpose and a roof to manage weather this is not considered an indoor environment. More than two walls and a roof constitutes an indoor environment. The presence of doors constitutes an indoor environment.

Technical Bulletins

#	Bulletin Topic	Issue Date
1	Grandfather Provisions	Re-issued October 18, 2022
2	Fire Separation Requirements for Storage and/or Treatment Areas Enclosed Within Multiple Occupancy Buildings Relating to Protocols B1 & B2	Re-issued June 15, 2023
3	Provincial Requirements for Seed Treatment Operators	Re-issued June 1, 2023
4	Guidelines for Portable Storage Containers (inter-modal) Conversion to Accredited Seed Treatment Operation Standards	Re-issued January 1, 2022
5	Clarification Protocol B7 – Containment	Withdrawn
6	Disposal of Treated Seed	August 2016
7	A. Code Applicability for Mobile Seed Treater Scenarios B. Documentation and Auditing of Mobile Seed Treaters C.	Re-issued January 1, 2021
8	Seed Treatment Products – Shipping Guidance	Re-issued January 1, 2021
9	Farmer Access to Seed Treatment Products for On-farm Application – Shipping Guidance	Re-issued January 1, 2021
10	Commercial Seed Treater Access to Designated Seed Treatment Products for Commercial Application on non-Designated Commodities – Shipping Guidance	Withdrawn

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Revised October 18 , 2022

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.
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.

Protocol B3 states:

For storage and/or seed treatment areas, windows that have been installed in interior fire separation walls are required to have a fire resistance rating of 2 hours, mounted in fixed steel frames.

For sites pre-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 states: The accredited area:

a) The storage area has a containment system in place to contain volumes of spilled liquids.

b) The seed treatment area has a containment system in place to contain volumes of spilled liquids.

B7(a), States all storage areas must have containment. This is a mandatory protocol. 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, they are grandfathered for this provision for the sloped floor configuration

In 2022, Protocol B7(b) changed from being 30 points to being mandatory. Sites pre-audited to March 31, 2015 are considered grandfathered and not required to meet this mandatory requirement.

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.

For b10(a), no grandfathering provisions were allowed.

For B10(b) for sites pre-audited prior to March 31, 2015, for seed treatment areas which are constructed of combustible materials, if they were elevated they 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.

In 2022, Protocol B10(b) changed from being 30 points to being mandatory. For sites certified prior to January 1, 2022 that scored zero points for protocol B7(b) are considered grandfathered and not required to meet this mandatory requirement. Any retrofits/renovations done after January 1, 2022, will require containment.

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Revised: June 15, 2023

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.

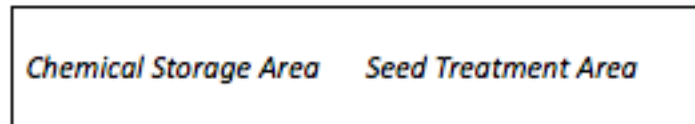
Seed treatment areas pre-audited prior to March 31, 2015 can be also grandfathered to allow for seed cleaning activities in the same area as the seed treatment area. Sites not grandfathered require separation, as outlined in Protocol B2, between the seed cleaning area and the seed treatment area.

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.

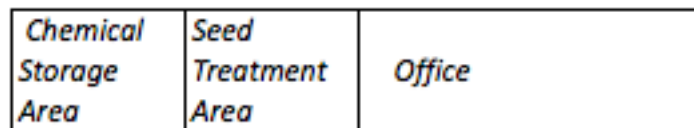
Interpretation examples:

Scenario 1:



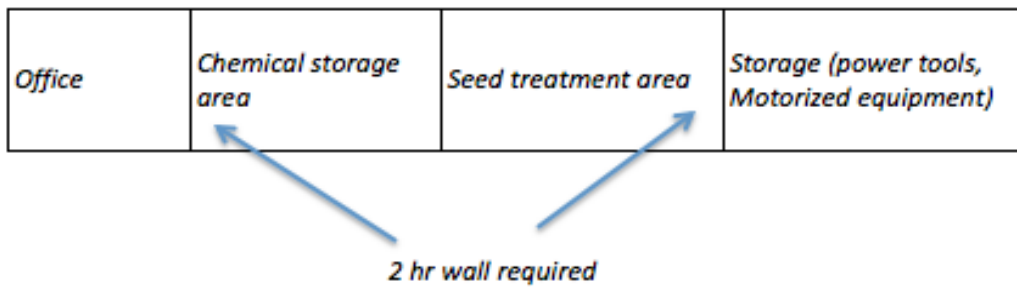
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A separate between the chemical storage area and seed treatment area is not required. Given the storage and treatment area is treated as one, the entire area must complete with the requirements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

Scenario 2.



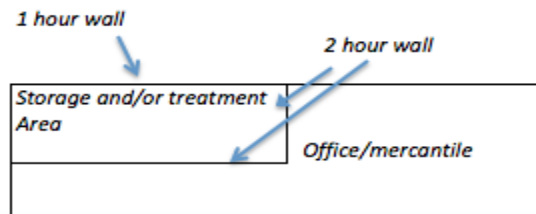
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. The wall between the Seed treatment area and the office must have a two-hour fire rating. The wall between the chemical storage area and seed treatment area is optional.

Scenario 3.



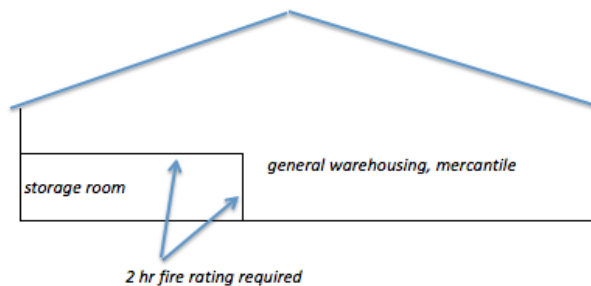
In this scenario, the exterior walls must be non-combustible or provide a minimum of a one-hour fire rating. A two-hour fire separation is required between the office area and the chemical storage area. A two-hour fire separation is also required to separate chemical storage area from the general storage 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).

Questions/Answers

Question/Scenario	Answer/Interpretation
Does Insulation impact the fire-rating of a wall assembly?	<p>Yes – Many warehouses use insulation in their wall assemblies to provide protection from the elements. This is allowed provided:</p> <ul style="list-style-type: none"> • If the insulation is applied to non-combustible construction materials (steel studs, steel siding etc.), evidence would be required that confirms the insulation is non-combustible. If the insulation is combustible, the wall assembly must be made up of a combination of materials (insulation, drywall) to get the required rating (1 or 2 hours). For walls made of combustible materials, insulation must be factored into the assembly to confirm that the combination of materials provides a 1 (or 2) hour rating.
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
Can plywood be applied over drywall?	<p>Some warehouses apply plywood over drywall to serve as protection from impact.</p> <p>The addition of wood structural panels covering the fire-rated gypsum board wall assemblies is permitted. (Reference NBC 2015, Clause 3.1.5.12)</p> <p>Further, when constructed of combustible materials, plywood is allowed to be added onto of the drywall. (Reference NBC 2015, Clause 3.1.5.6)</p> <p>See Warehouse Bulletin # 4 (January 2023) for further details.</p>
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)).
Can a fire-proof cabinet be used to store seed treatment products?	<p>Yes provided that the cabinet capacity does not exceed the storage of 1000L. Signage and containment is required. Ventilation inside the cabinet is not required. The room within which the cabinet is housed does not require firewalls. Documentation to evidence fire proofing of the cabinet is necessary. The rating that will be on the cabinet is NFPA 30. The fire cabinet must be located within a containment area (or the cabinet has internal containment sufficient to contain 110% of the largest container stored). There are no special flooring requirements for the room within which the cabinet is housed.</p>

<p>What is considered product storage versus in use?</p>	<p>A tote that is connected to a seed treater is considered in use. All other seed treatment products must be kept in the designated storage area.</p>
<p>Can paint be used to achieve a fire rating?</p>	<p>Paint doesn't give any fire rating. It provides flame spread ratings which is something completely different. Fire resistant resists the flame spread whereas fire walls prevent the structural failure in case of fire.</p> <p>When the seed code was implemented some grandfathered sites with elevated treaters with combustible support structure (i.e., wood) were granted allowance to use paint with a fire spread rating of A on the support structure. This would not be acceptable for any new certifications or renovation of existing certified sites.</p>
<p>What is the building code classification for a storage area and what is the classification for the treating area?</p>	<p>F1 or F2.</p> <p>For the treatment area the products are not combustible/explosive, then explosion proof wiring is not needed.</p> <p>If the products are not combustible/explosion proof, the storage and treatment area is classified as F1.</p>

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Re-Issued: June 1, 2023

NUMBER: 3

Provincial Requirements for Seed Treatment Operators

Protocol D6 states: An individual who is responsible for the seed treatment operation has obtained provincial seed treatment operator certification.

Note: the auditor will inspect the current certification of at least one employee to ensure that a pertinent onsite staff member holds valid provincial certification/licence.

Province	Licence Required	Description	More information
British Columbia	Pesticide Applicator Certificate	People applying restricted pesticides in BC must have a valid pesticide applicator certificate. The BC Ministry Environment issues pesticide applicator certificates, dispenser certificates and licenses for pest control companies and pesticide sales outlets. When certification is required, it is the person applying the pesticides who needs to be certified.	BC Ministry of Environment
Alberta	Pesticide Service Registration	Business that provide pesticide application for hire or reward are required to have a Pesticide Service Registration for the specific pesticide application services that are offered. The primary employee should be registered and may oversee other assistants that perform application activities. The registration is a one-time registration that is free of charge.	Alberta Environment and Parks 780-427-6311
Saskatchewan	Pesticide Service Licence. Pesticide applicator Licence Commercial Seed Treatment	Companies or individuals that conduct pesticide applications as part of their business for hire or reward are required to hold a Pesticide Service Licence . To operate a commercial seed treater, the Ministry of Agriculture would require the company to have at least one employee who has current (within the last five years) Commercial Seed Treatment Training PEST 175 and who holds	Saskatchewan Ministry of Agriculture 306-787-4662 pesticidelicensing@gov.sk.ca

	Training PEST 175	<p>the Pesticide Applicator License from the governing and licensing body, the Ministry of Agriculture.</p> <p>The primary employee responsible for the application activities should be licenced and may oversee other assistants that perform application activities. The licence term is one year.</p>	
Manitoba	Pesticide Applicator Licence	Commercial pesticide applicator that applies pesticides for a fee, charge or other valuable consideration. The primary employee responsible for the application activities should be licenced and may oversee other assistants that perform application activities. The licence term is one year with an annual fee of \$100.	Manitoba Agriculture (204) 945-7672
Ontario	There is no specific provincial licencing requirements in Ontario pertaining to commercial seed treatment application.	But in order to be eligible to receive a shipment of commercial class pesticides the operator would need either an Ontario Pesticide Vendors Licence or Grower Pesticide Safety Certification. Alternatively an operator may elect to become a Licenced Pesticide Exterminator with the Ontario Ministry of Environment.	Ontario Pesticide Education Program 800-652-8573
Quebec	CD11 – Aures cas d’application – Enrobage des semences avec des pesticides	Sous Categorie CD11 – Aures cas d’application – Enrobage des semences avec des pesticides	https://www.environnement.gouv.qc.ca/pesticides/permis/modif-reglements2017/index.htm
Prince Edward Island	Pesticide Applicator Certification	<p>An individual or company that wants to apply a commercial class pesticide must obtain a pesticide applicator certificate. All pesticide applicator certificates are issued by the Environment, Water and Climate Change.</p> <p>Licences are \$75 and are valid for 5 years.</p>	<p>Environment, Water and Climate Change.</p> <p>902-368-5599</p>
Nova Scotia	Pesticide Applicator Certification	<p>In Nova Scotia anyone who sells or applies a commercial or restricted class pesticides must be certified by Nova Scotia Environment.</p> <p>Licences are valid for 5 years.</p>	Environment and Climate Change

New Brunswick	Pesticide Applicator Certification	Any individuals wishing to handle (purchase, sell, store, transport or use) a non-domestic pesticide must hold a Pesticide Applicator Certificate. Commercial (Classes A through K) certification is issued annually. Private (Class L) certification is issued for up to five (5) years.	Email: Pesticides@gnb.ca Fax: 506 453 2390 Telephone: 506 453 7945 or 506 444 5361
Newfoundland	N/A		

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Re-Issued: January 1, 2022

NUMBER: 4

Guidelines for Portable Storage Containers (inter-modal) Conversion to Accredited Seed Treatment Operation Standards

Portable storage containers for this Bulletin are defined as inter-modal used to transport goods on railcars, trucks and ocean vessels. They come in a wide range of sizes and heights with typical sizes of 2.4 meters (8 feet) in width, up to 16 meters (52 feet) in length and 2.5 meters to 3 meters (8.5 to 10 feet) in height. Basic constructions of these containers are steel walls, roof and floor.

When converting a container for seed treatment product storage all protocols are applicable. The Bulletin was developed to aid operators in the conversion process.

Section A – Siting and Exterior Requirements

- All containers must be in compliance with distance requirements references in protocols A1, A2 and A3.
- All containers must be in compliance with applicable lighting and signage requirements referenced in protocols A4, A5, A6, A7 and A8.

Section B – Building Structure and Equipment

- B5, B6, B9 – Based on typical container configuration protocols will be compliant.
- B1 – Containers must be non-combustible (steel rigid frame). Any combustible materials on the interior walls would have to be removed or constructed to meet a 1-hour fire rating.
- B7 – Metal sheeting is deemed impervious to chemical spill and is deemed compliant. The auditor is required to verify the integrity of the container floor to ensure there are no holes or seams where liquid can escape. Retention curbing (10 cm) is required for inside containment. In most cases the walls could act as a curb. Curbing would be required at the doors. This can be achieved by placing metal sheeting or angle iron at a height of 10 cm at the doorway. Ensure the curbing is leak proof at the edges (e.g. caulking may be required).

In cases where wooden decking covers the metal container floor and the floor is not visible for inspection, containment can be achieved by either:

- metal sheeting can be used on top of the wooden deck. The sheeting must be attached to the metal frame and have curbing of 10 cm around the full perimeter or;
- baffled pallets can be used.
- B10 – Floors and floor support structures must be constructed of non-combustible materials. The metal exterior of the shipping container is acceptable. Wooden decking inlaid on top of the exterior

floor is acceptable provided containment is achieved (see B7 above). Shipping containers must be placed on level non-combustible material (e.g. gravel).

- B11 – The container does not have an active floor drain.
- B12 – Ventilation system must be designed to provide a minimum of 2 air changes per hour. See example of ventilation calculation for the appropriate configuration.
- B14 – The ventilation system must be designed to control explosive vapours.
- B15 – If heat is required (no flame), electric wall heaters are common, these units would need to be CSA approved, hardwired and at a height in excess of the floor curbing (10 cm).

Protocols that have not been referenced either apply for all seed treatment storage facilities or are not applicable.

Quick Conversion Checklist

- Ensure the container is completely steel (frame, walls, and roof).
- Remove all combustible materials from inside walls/ceiling of the container or covered for a 1 hour rating.
- Weld steel deck to the floor support beams or steel walls, if a solid steel floor is not present.
- Place storage container on level non-combustible material (e.g. well drained compacted gravel base).
- Weld steel angle iron (10 cm) at doorway for internal containment. Ensure containment is leak-proof. (B10)
- Ventilation cut is a maximum 30 cm (12 inch) from the floor at opposite end of container from doors (B14)
- Hard wire lighting, ventilation and heating system (no flame) in container above containment curbing.
- Complete ventilation measurement prior to installing mechanical ventilation to ensure minimum 2-hour air exchange is achieved.
- Raised steel mesh floors can be installed to allow for drive in capabilities to the storage container.
- Container security can easily be achieved by applying a pad lock on doors.

Issued: August 8, 2016

Number: 6

Disposal of Treated Seed Guidelines

The use of seed treatment products is an integral part of agricultural production and are widely used within Canada. However, it is important that any treated seed that no longer fits its intended purpose is responsibly disposed of in accordance with best management practices and relevant federal, provincial and municipal laws and regulations.

There are a number options for the responsible disposal of treated seed that an operation can employ. The following options may not fit every seed treatment operation and are designed to be used as “*potential*” disposal options. These options may be impacted by the pesticide active ingredient(s) on the seed, application rate, volume of treated seed destined for disposal, as well as any applicable laws and regulations.

1. Plant treated seed

Plant treated seed at an agronomically acceptable rate to ensure the maximum label rate per acre of pesticide(s) is not exceeded and plant at an appropriate depth for the seed to achieve germination. If treated seed is broadcast on the soil surface incorporate immediately.

2. Disposal at an approved landfill

Treated seed in some instances may be permitted for disposal in a landfill. However, prior to disposal the seed handler should contact the landfill to ensure treated seed meets landfill criteria and all applicable laws and regulations.

3. Use as a fuel source

Treated seed in some instances may be used as an alternative fuel source. Operations such as cement kilns and power plants utilize various non-fossil fuel sources. However, prior to disposal the seed handler will need to contact the facility to ensure the facility has applicable permits and the willingness to receive treated seed for disposal.

4. Disposal via a waste management facility

Treated seed may be disposed of via high temperature incineration. Waste management companies in many instances are able to accept treated seed for transport and ultimate destruction via high temperature incineration, but the seed handler will need to contact a waste management facility to ensure the company has the applicable permits and willingness to receive treated seed for disposal.

In addition to the various disposal options previously identified there are several treated seed disposal practices that are **not** recommended including:

- 1. Composting treated seed**
- 2. Spreading on to fallow or non-cropped field without incorporating seed**
- 3. Disposal at a landfill that does not have applicable permits**
- 4. Disposal via a waste management facility that does not have applicable permits**
- 5. Burning on farm.**

Disposal of seed treatment containers

Treated seed may be held in various containers including paper or plastic seed bags, totes or molded seed boxes. These various containers may still contain seed dust, debris or small amounts of treated seed and should be disposed of responsibly and in compliance with any applicable laws and regulations.

1. Disposal in an approved industry stewardship program

Depending on the relative geography within Canada there are programs that exist where paper and plastic seed bags (i.e. 25 kg) and polypropylene sacks (i.e. 500 to 1000 kg) may be returned for safe disposal as part of an industry initiative (visit www.cleanfarms.ca).

2. Return containers to product manufacturer

Molded seed boxes in many cases may be returned to the product manufacturer or seed distributor for safe disposal or re-use.

3. Dispose of in an approved landfill

Seed treatment bags and tote sacks in some instances may be permitted for disposal in a landfill. However, prior to disposal the seed handler should contact the landfill to ensure seed treatment bags and tote sacks meet landfill criteria and all applicable laws and regulations.

4. Disposal via a waste management facility

Seed treatment containers may be disposed of via high temperature incineration. Waste management companies in many instances are able to accept a wide range of treated seed containers for transport and ultimate destruction via high temperature incineration.

In addition to the various disposal options previously identified there are several treated seed container disposal practices that are **not** recommended including:

- Never re-use seed containers that have contained treated seed. In some instances molded containers may be reused by the seed distributor following a thorough cleaning and disinfection process.

Treated Seed in Grain Shipments

Treated seed can become a significant risk to human and animal health and negatively impact grain trade if any treated seed is found in grain shipment to elevators. The following are best practices to prevent treated seed in grain deliveries:

1. Clean up spills and safely dispose of immediately
2. Clean all equipment, bins and vehicles thoroughly after seeding and before harvest
3. Visually inspect all equipment, bins and bulk containers for the presence of treated seed

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Updated: January 1, 2021

NUMBER: 7

**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.

- 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 facility is available from AWSA and is available online at www.awsa.ca

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.

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Updated: January 1, 2021

NUMBER: 8

Seed Treatment Products – Shipping Guidance

This Bulletin provides clarification to ag-retailers and distributors to ensure compliance with the seed treatment product no-ship policy.

Effective January 01, 2021 only commercial seed treatment operations that have successfully completed an audit will be eligible to receive shipments of seed treatment products for commercial application (i.e. for sale or gain) from distributors or ag-retailers.

Note: a complete listing of all Accredited Seed Treatment Operation sites and corresponding site specific certification number is available to access on the AWSA website (www.awsa.ca).

Scenario Analysis – a number of common industry scenarios have been identified with requirements for each situation:

- 1. Ag-retail location staff applying seed treatment products on any commodity as part of service offering**
 - Required to complete Accredited Seed Treatment Operation Standards audit.
- 2. Ag-retail location offering seed treatment service of seed treatment products on any commodity with 3rd party equipment and staff**
 - 3rd party required to complete Accredited Seed Treatment Operation Standards audit.
 - Ag-retail operation MAY be responsible for seed treatment product storage. Evidence must be provided to AWSA auditor as part of audit outlining defined roles and responsibilities of both parties.
- 3. Ag-retail ships seed treatment products to commercial seed treatment operation applying product on any commodity.**
 - Ag-retail facility must ensure that the commercial seed treatment operation is an Accredited Seed Treatment Operation (as evidenced by a current site-specific certification number)
 - The Accredited Seed Treatment Operation Standards site specific certification number must be included on all shipping documents (i.e. invoice(s) and bill(s) of lading).

4. Ag-retail ships seed treatment products to farmer for on-farm treatment

- There are no restrictions on shipments of seed treatment products to farmers for on-farm treatment.
- Ag-retail operations are required to inform farmers who receive a shipment(s) of seed treatment product(s) for on-farm application to acknowledge that the seed treatment is to be applied exclusively within their farming operation.
- Ag-retail operations are required to inform farmers that if 3rd party applicator retained to apply seed treatment must be Accredited Seed Treatment Operators.
- Farmer acknowledgement waivers must be updated annually.

5. Ag-retail facility sells previously packaged seed that has been treated with a seed treatment product (i.e. product was previously treated prior to ag-retail site receiving product)

- There are no Accredited Seed Treatment Operation Standards requirements for the selling previously packaged seed that has been treated with a seed treatment product.

Note: for additional mobile seed treatment clarification refer to Bulletin # 7 *Code Applicability for Mobile Seed Treater Scenarios*

Shipping Documentation Requirements

Ensure:

- Shipments of seed treatment product(s) to an Accredited Seed Treatment Operation should include the site-specific certification number on applicable shipping documents (i.e. invoice(s) and bill(s) of lading).

Notes:

- As part of the AWSA Agrichemical Warehousing Standards audit process (Reference AWSA Agrichemical Warehouse Standards Protocol E16) an AWSA auditor will inspect a sample of shipping documents to verify that seed treatment product was shipped in compliance with the no-ship policy.
- If a facility is identified as wrongfully shipping seed treatment products the AWSA Compliance and Enforcement Process will be invoked.

Agrichemical Warehousing Standard Association

ACCREDITED SEED TREATMENT STANDARDS BULLETIN

Updated: January 1, 2021

NUMBER: 9

Farmer Access to Seed Treatment Products for On-farm Application – Shipping Guidance

This Bulletin provides clarification to ag-retailers and distributors to ensure compliance with the seed treatment product no-ship policy.

Effective January 01, 2021 only commercial seed treatment operations that have successfully completed an audit will be eligible to receive shipments of seed treatment products for commercial application (i.e. for sale or gain) from distributors or ag-retailers.

Farmer access to seed treatment products for on-farm application:

- There are no restrictions on shipments of seed treatment products to farmers for on-farm seed treatment to be applied exclusively within their farming operation.
- If farmer is contracting a 3rd party applicator to treat seed, the 3rd party applicator must be an Accredited Seed Treatment Operation.

Shipping Documentation Requirements

Ensure:

- Shipments of seed treatment product(s) to a farm operation should include a current waiver form signed annually (see example) or equivalent verification of farmer acknowledgement is on file. The information may be included on the bill of lading, product invoice or other means of shipping documentation (as per company policy) indicating the end user acknowledges (via signature) is aware of the application restrictions for all shipments of seed treatment products they receive for on-farm treatment.

Notes:

- As part of the AWSA Agrichemical Warehousing Standards audit process (Reference AWSA Agrichemical Warehousing Standards Protocol E16) an AWSA auditor will inspect a sample of shipping documents to verify that seed treatment product are shipping in compliance with the no-ship policy.
- If a facility is identified as wrongfully shipping designated seed treatment products the AWSA Compliance and Enforcement Process will be invoked.

Declaration of On-farm Application of Seed Treatment Product

By signing this document you confirm the following statements are true:

1. I confirm that I understand that effective January 01, 2021 that the seed treatment products I receive for application are to be used exclusively for my own farming activities.
2. I understand that the conditions of the On-farm Application of Seed Treatment Product Declaration does not permit the application of seed treatment products on seed that as part of a service offering (for sale or gain) beyond my own farming activities.
3. I acknowledge that if I contract with a 3rd party to apply seed treatment products, that the 3rd party must be an Accredited Seed Treatment Operation.
4. I agree to notify the ag-retailer/distributor in advance of any changes in use, scope or operation associated with my on-farm seed treatment that may result in a change in the applicability of the On-farm Application of Seed Treatment Product Declaration (i.e. treating seed for sale or gain). Failure to provide such notice may result in non-compliance penalties under the Accredited Seed Treatment Operation Standards.

I understand and agree to the terms of this Declaration.

Customer Signature: _____ Date: _____

Operation Name: _____

Witness: _____ Date: _____

Notes:

- This Confirmation must be renewed annually and kept on file.
- 3rd party applicators can be verified as being Accredited Seed Treatment Operations by visiting www.awsa.ca

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	Y	Y	Y	Y	NA	NA
A2	Mandatory	Y	Y	Y	Y	NA	NA
A3	Mandatory	Y	Y	NA	Y	NA	NA
A4	10	Y	Y	NA	Y	NA	NA
A5	10	Y	Y	Y	Y	NA	NA
A6	10	Y	Y	NA	Y	Y	Y
A7	20	Y	Y	Y	Y	Y	Y
A8	60	Y	Y	NA	Y	Y	Y

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	Y	NA	NA	Y	NA	NA
B1 b	Mandatory	Y	NA	NA	Y	NA	NA
B2 a	Mandatory	NA	Y	NA	NA	NA	NA
B2 b	Mandatory	NA	Y	NA	NA	NA	NA
B3	20	Y	Y	NA	Y	NA	NA
B4	Mandatory	Y	Y	NA	Y	NA	NA
B5	20	Y	Y	NA	Y	NA	NA
B6	20	Y	Y	NA	Y	NA	NA
B7 a	Mandatory	Y	NA	NA	Y	Y	NA
B7 b	Mandatory	NA	Y	Y	NA	NA	Y
B8a	30	Y	NA	NA	Y	Y	NA
B8 b	Mandatory	Y	NA	NA	Y	Y	NA
B9 a	30	NA	Y	Y	NA	NA	Y
B9 b	Mandatory	NA	Y	Y	NA	NA	Y
B10 a	Mandatory	Y	NA	NA	Y	Y	NA
B10 b	Mandatory	NA	Y	NA	NA	NA	NA
B11	Mandatory	Y	Y	NA	Y	Y	NA
B12	Mandatory	Y	NA	NA	Y	NA	NA
B13	Mandatory	NA	Y	NA	NA	NA	NA
B14	10	Y	NA	NA	Y	NA	NA
B15	Mandatory	Y	Y	NA	Y	NA	NA
B16	Mandatory	Y	Y	Y	Y	Y	Y
B17 a	20	Y	Y	Y	Y	NA	NA
B17 b	20	Y	Y	Y	Y	NA	NA
B17 c	Mandatory	NA	NA	NA	NA	Y	Y
B18 a	Mandatory	NA	Y	Y	NA	NA	Y
B18 b	20	NA	Y	Y	NA	NA	Y
B19	Recommend	Y	Y	NA	Y	NA	NA
B20	Recommend	Y	Y	NA	Y	NA	NA

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	Y	Y	Y	Y	NA	NA
C2	120	Y	Y	Y	Y	Y	Y
C3	Mandatory	Y	Y	Y	Y	Y	Y
C4	Mandatory	Y	Y	Y	Y	Y	Y
C5	20	Y	Y	Y	Y	NA	NA
C6	10	Y	Y	NA	Y	NA	NA
C7	10	Y	Y	Y	Y	Y	Y
C8	Mandatory	Y	Y	Y	Y	Y	Y
C9	Mandatory	Y	Y	Y	Y	Y	Y
C10	20	Y	Y	Y	Y	Y	NA
C11	Mandatory	Y	Y	Y	Y	NA	NA
C12	Mandatory	NA	Y	Y	NA	NA	Y

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	Y	Y	Y	Y	Y	Y
D2	Mandatory	Y	Y	Y	Y	Y	Y
D3	Mandatory	Y	Y	Y	Y	Y	Y
D4	Mandatory	Y	Y	Y	Y	Y	Y
D5	Mandatory	Y	Y	Y	Y	Y	Y
D6	Mandatory	Y	Y	Y	Y	Y	Y
D7	Mandatory	Y	Y	Y	Y	Y	Y
D8	Mandatory	Y	Y	Y	Y	Y	Y
D9	Mandatory	Y	Y	Y	Y	Y	Y
D10	Mandatory	Y	Y	Y	Y	Y	Y

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	Y	Y	Y	Y	NA	NA
E2	Mandatory	Y	Y	Y	Y	NA	NA
E3	Mandatory	Y	Y	Y	Y	NA	NA
E4	30	NA	Y	Y	NA	NA	Y
E5	Mandatory	Y	Y	NA	Y	NA	NA
E6	30	Y	Y	NA	Y	NA	NA
E7	Mandatory	NA	Y	Y	NA	NA	Y
E8	Mandatory	Y	Y	Y	Y	Y	Y
E9	Mandatory	Y	Y	Y	Y	Y	Y
E10	60	Y	Y	Y	Y	Y	Y
E11	20	Y	NA	NA	Y	Y	NA
E12	20	Y	NA	NA	Y	Y	NA
E13 a	10	Y	Y	Y	Y	Y	Y
E13 b	Mandatory	Y	Y	Y	Y	Y	Y
E14	Mandatory	Y	Y	Y	Y	Y	Y
E15	20	Y	Y	Y	Y	Y	Y
E16	Mandatory	NA	Y	Y	Y	Y	Y

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	Y	Y	Y	Y	Y	Y
F2	50	Y	Y	Y	Y	Y	Y
F3	40	Y	Y	Y	Y	Y	Y
F4	20	Y	Y	Y	Y	Y	Y
F5	10	Y	Y	Y	Y	Y	Y
F6	40	Y	Y	Y	Y	Y	Y
F7	20	Y	Y	Y	Y	Y	Y

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	Y	Y	Y	Y	Y	Y
G2	60	Y	Y	Y	Y	Y	Y
G3	20	Y	Y	Y	Y	Y	Y
G4	20	Y	Y	Y	Y	NA	NA
G5	30	Y	Y	Y	Y	Y	Y
G6	Recommend	Y	Y	NA	Y	NA	NA
G7	Recommend	Y	Y	NA	Y	NA	NA

