

Record Keeping for Commercial Pesticide Applicators

As pesticide applicators, you are required to keep records of your pesticide use. There are federal laws that require you to keep records – the EPA and the USDA both have record keeping requirements - and there are state laws – the NH Division of Pesticide Control requires that all applicators, both private and commercial, keep daily use records and they require that you submit a yearly annual use report.

Daily use records:

Pes 901.02:

- All applications of pesticides by registrants or permittees shall be recorded simply and accurately with records being maintained at the firm, branch office, or subsidiary for pesticide applications performed by personnel working from such firm, branch office or subsidiary.
- Registrants and permittees shall keep and maintain these records for a period of at least 2 years whether or not there is a renewal of certification.
- The records shall be made available to the division to verify compliance.

This means that any time you apply pesticides, whether you're private or commercial, supervisory or operational, there needs to be a record of that application and those records need to be kept at your local office. If you work for a company with multiple locations, your application records need to be kept at your home branch that you work out of.

Your records need to be on file at your office for at least 2 years after the date that you used the pesticide. Even if you do not renew your applicator's license, you still need to maintain those records for 2 years.

Inspectors from the Division of Pesticide Control will come out periodically and ask to see your records. You must be able to provide those records on the spot. So, daily records should be accurate, organized, and accessible.

There is not a designated form for daily records. You can use whatever system works for you, as long as the records include the 7 items listed in Pes 901.02. You can download a daily record sheet at the link below, or use a form of your own. Many commercial for-hire applicators use a copy of their job sheets or invoices as daily records. As long as the records are simple, accurate, and include the 7 required pieces of information, you can use your own system.

Annual use reports:

Pes 901.04

In addition to Pes 901.02 (Daily Use Report), all records pertaining to the application of pesticides, as required under RSA 430:33 I, II, shall be made available to the division on an annual basis, for the period ending October 31, on or before December 1.



Annual use reports are a summary of the total amount of pesticides used and the amount of area treated each year. There IS a designated form to be filled out for this. The Division of Pesticide Control will mail the form to you each fall with your recertification package.

The annual use report covers all applications made from November 1 through October 31 each year.

The form is due back to the Division by December 1st. Failure to return your accurately completed form will result in suspension of your certification. Failure to return your form by June 1st will result in termination of your certification (to get your license back, you will have to retake the exams).

Fill out all information legibly and accurately.

- You can use a single form for multiple licensed applicators working for the same business, or fill out separate forms for each. Just be sure that each application is accounted for only once.
- Make only one entry per pesticide product used. For example, if you used RoundUp Pro several times, you will enter ONE LINE for RoundUp Pro.
 - You will enter the TOTAL number of acres treated with that product. If the same piece of land was treated multiple times with that product, count the area only one.
 - You will enter the TOTAL amount of the product used. Add up the total amount of undiluted product used over all applications during the year.
 - Record all totals in pounds, gallons, or ounces. Use of other units will result in rejection of your form.
 - This is where good daily records are needed!!
 - o Fill in the first 6 columns ONLY. Do not fill in the columns for "DPC Use Only".

Not only are pesticide records required by law, but they can also benefit you and your business and help you make management decisions. It is advisable to record MORE than is required by law – weather conditions, time of day, etc. can make your records more valuable to you.

Complete and accurate records can...

- Document crop history or site history.
- Help you evaluate how well a chemical worked.
- Help you manage pesticide resistance.
- Help you plan for future purchases.
- Provide documentation in the event of a complaint or lawsuit.

Daily Use Record Sheet: http://agriculture.nh.gov/publications-forms/documents/pesticide-daily-use-report.pdf

Annual Use Report Sheet: http://agriculture.nh.gov/publications-forms/documents/pesticide-yearly-use-report.pdf (This form will also be mailed to you annually).