

General Information

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BASIS Registration Limited

Stores Inspection and Assessment Scheme

Background

BASIS operates as an independent registration, standards and certification scheme serving pesticide, fertiliser and allied organisations and interests, recognised under the Plant Protection Product (sustainable use) Regulations 2012. It was started in 1977 by the trade organisations in the crop protection industry at the behest of the Government and was incorporated in April 1978. Interest in non-agricultural pesticides was included from 1991, and BASIS became a registered charity in 1999.

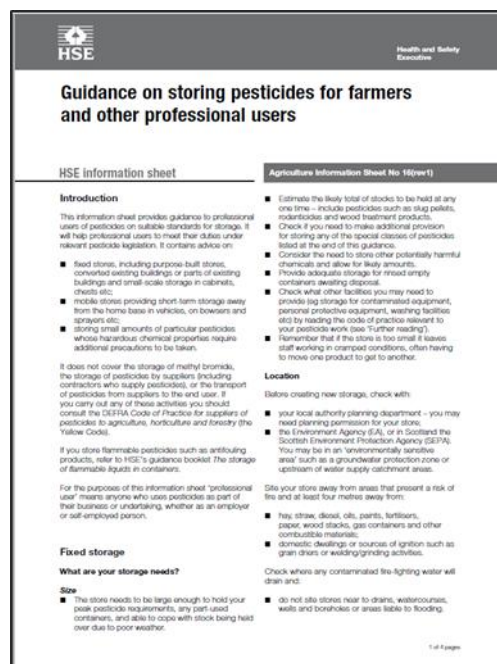
The organisation also provides a forum for the industry's trade associations and individuals to discuss all matters relating to the maintenance and improvement of professional standards.

Legislation

Anyone who **advertises, sells, supplies, stores or uses** a pesticide (including for their own homes and gardens) is bound by legislation.

UK pesticide law is strongly **related** to EU pesticide legislation. The Plant Protection Products (Sustainable Use) Regulations tell us that we have to comply with the legislation by following approved Codes of Practice. In the UK the Code of Practice is the **Defra Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry**.

HSE also provide Guidance Notes which should be adhered to alongside the approved Code.



The BASIS Stores Inspection Scheme ensures other Regulations are also considered by operators of professional pesticide stores. This may include Environmental legislation such as the Water Framework Directive, Fire legislation such as the Regulatory Reform Fire Safety Order, and the Health & Safety at Work Act. COSHH regulations. COMAH regulations will also apply to some sites (Please see Appendix 1).

BASIS is a registered Charity and has committees working with each sector of the business. These committees have representation from other interested parties including legislators and stakeholders. The members of the BASIS Logistics Committee represent the needs for the storage and distribution sector. A list of the current members of this committee and the terms of reference are listed in Appendix 2 of this booklet.

The Code of Practice advises that professional pesticide stores should have an inspection by an independent organisation. The PPP (SU) Regulations state that storage facilities should provide protection against unwanted releases into the environment. BASIS provides assurance and proof that you are taking these requirements seriously and endeavouring to comply with the regulations through the BASIS Scheme. The PPP (SU) Regulations also states that you should have sufficient numbers of suitably trained and certificated staff. (BASIS Certificate in Crop Protection for advisers and the Nominated Storekeeper Certificate for store operators). Details of these courses can be found on the BASIS website www.basis-reg.co.uk

BASIS Operates Several Types of Store Inspection Schemes.

These are based on your company / store operations and requirements. We are able to cater for most business operations dealing with pesticides and rodenticides.

A Small Stores Scheme (Under 100lts)
RAMPS only store (Aluminium phosphide storage only)
BACCS Scheme (Amenity Contractors storage)
BASIS Stores Inspection Scheme (Professional Pesticide Stores)
Rodenticides only Scheme
End User Scheme
Transport Only Scheme (No fixed Store)
Contract Only Scheme (No fixed Store)

Objectives of the BASIS Stores Inspection Scheme

The aim of this Scheme is to ensure

- adherence with current regulations and good practice
- a high standard of safety in the storage, distribution and contract application of pesticides;
- a due regard for the protection of the environment;
- that people offering advice on pesticides, at the time of sale have received proper training and have the appropriate certification as listed (in the annex to the regulations).
- that Nominated storekeepers have obtained a Certificate of Competence and maintained the knowledge learned through regular refresher training

The registration process

To register your store for the BASIS Stores Inspection Scheme, you need to complete an application form which can be downloaded from the BASIS website: www.basis-reg.co.uk

Once we receive your application, we will check we have all the information we need and then invoice you for the cost of registration. This is an annual cost and is made up of two or three charges depending on your store requirements.

- 1) A registration charge.
- 2) A charge relating to the size of your bunded storage facility.
- 3) An additional small charge if you have multiple operations requiring more than one area to be audited for instance; a store and a seed treatment plant or a store and a contracting operation, or store and a Rodenticide Point of Sale Audit.

If you need to ask us to clarify how you are to be charged, please contact stores@basis-reg.co.uk or call 01335 301318.

Every year, shortly before your annual invoice is issued, you will be sent an audit of your listed BASIS qualified staff who we have previously been notified are based in one of your depots or stores. This must be reviewed and signed annually by the BASIS Nominated Director (person within your organisation who has senior responsibility for BASIS matters) as part of the audit process.

Company Registration is for one year and renewable annually, for which an annual fee is payable. To be awarded a Certificate of Registration you must have:

- a) Completed and returned the Annual staff audit return
- b) Passed your store audit (rectified any non-compliances identified at audit)
- c) Paid your invoice

Certificates are valid from 1st January to 31st December and are non-transferrable.

The audit process

This information relates to a standard Professional Pesticide store and is meant as a guideline only as to what to expect. Each type of audit process differs slightly but the core of the audit remains largely the same. Please contact the BASIS office for specific details.

The BASIS auditing team are highly experienced individuals who have undergone training through BASIS and are also all qualified Nominated Storekeepers.

They are assigned a list of stores geographically and will arrange the visits to stores to fit with others in the area. You will receive notice of the visit no later than 2 weeks prior to the visit date. You will also receive a copy of the Storekeepers Checklist (Appendix 3) to aid with ensuring items for inspection are available. Please try and accommodate the visit date where possible as rearrangement of one visit within an area can be costly.

Audit visits last approximately 1-2 hours and will be conducted during normal working hours.

Please ensure that a nominated storekeeper or other person with responsibility is available to accompany the auditor.

Content of Audit

You will have already received the Storekeeper checklist which lists the documentation, equipment, signs and other items that will be inspected.

Some of the documentation will need to have been reviewed annually as a BASIS scheme requirement, as these standards are based around not just legislation but also good practice.

Some of the documentation the assessor will ask to see is listed here however please refer to the checklist for a full list.

EA Approval or Current Environmental Risk Assessment

Current Fire Authority Approval/Acknowledgement & a completed Fire Risk Assessment

Emergency Contingency Plan including current site and drain plan

Public and employer liability insurance document

Health & Safety Policy-reviewed every 12 months and signed

Current COSHH Assessment for the products stored and/or used

Inventory of stock -held available and accessible away from the store

Accident Book

Poisons Register and Signed Orders (if applicable)

DGSA-in house of external contract

The Auditor will then ask to see your storage facilities and where you keep spill kit and PPE etc.

The list of items to be checked is listed on the storekeeper checklist.

These include:

Fire extinguishers

Brush

Shovel

Absorbent (Spill kit)

PPE

The Assessor will look around your store and check the condition of your stock including the labels.

Once the audit is completed electronically by the auditor, a brief hand-written report will be left indicating any deficiencies to be rectified.

Following the Audit

A full written report will be sent to the company Nominated Director within 2 weeks of the audit being completed.

Any deficiencies should be rectified and evidence sent to the BASIS office, this can be in the form of photographs, receipts, documentation etc.

Once the audit actions have been closed your store will become compliant (Pass)

Please do not hesitate to contact the BASIS Logistics Department if you have any queries on 01335 343945 email: stores@basis-reg.co.uk

Further guidance

Appendix 1 – COMAH Guidance

Appendix 2 – BASIS Logistics Committee

Appendix 3 – Storekeeper Checklist

Useful Links

Read more about the stores inspection scheme:

<http://www.basis-reg.co.uk/Schemes/BASIS-Scheme/About-BASIS-Scheme>

Read more about the BASIS Certificate in Crop Protection (FSTS)

<http://www.basis-reg.co.uk/Exams-and-Courses/Course-Listing/CourseAreaID/1c1b92d1-eb07-413c-ab2e-b0e0d2325d64>

Read more about the Nominated Storekeepers Certificate of Competence

<http://www.basis-reg.co.uk/Exams-and-Courses/Course-Listing/CourseAreaID/91257990-e73c-4e73-932f-64c68cef3570>

Read more about the government (HSE) requirements for pesticides

<http://www.hse.gov.uk/pesticides/>

Read more about the specified training certificates in relation to pesticide use, advice and storage

http://www.hse.gov.uk/pesticides/resources/R/Recognised_certificates.pdf

Read more about all aspects of Health & Safety

<http://www.hse.gov.uk/>

194_17

194_17 Guidance note on COMAH and the BASIS Store Inspection Scheme

21 June 2017 v1.0

This document provides guidance on the interaction between the Control of Major Accident Hazards Regulations 2015 (COMAH), pesticide sale and supply stores registered and certified with BASIS Registration Ltd, and the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry (published 1998).

Principles of COMAH

Regulation 5 of COMAH requires that "every operator must take all measures necessary to prevent major accidents and to limit their consequences for human health and the environment." The COMAH regulatory regime is based on the principle of reducing all levels of risk to as low as is reasonably practicable (ALARP). Operators should consider: 'What more can I do to reduce the risks?' and explain: 'Why have I not done it?' As a minimum, operators are expected to implement good practice.

COMAH and good practice

Sources of good practice relevant to activities that fall under COMAH include approved Codes of Practice and standards produced by organisations such as the British Standards Institution. The COMAH Regulations are enforced by the COMAH Competent Authority (CA), either the Environment Agency or Health and Safety Executive as appropriate, who take on board evidence of compliance with relevant Codes of Practice when determining whether COMAH has been complied with.

In cases where good practice has not been established, the first step should be to examine the good practice that applies in comparable circumstances, for example that used in a similar process, to determine if it is transferable or can be modified to achieve at least the same level of protection.

COMAH and BASIS registration of professional pesticide stores

The [COMAH performance and recognition framework](#) identifies registration and certification of professional pesticide stores with BASIS as evidence of adoption of good practice for risk reduction. The CA will take into account certified BASIS scheme membership as evidence of the operator complying with the [Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry](#).

It is not compulsory to be a certified member of the BASIS Store Inspection Scheme to show compliance with the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry, or to show compliance with COMAH. However, certified BASIS scheme membership shows that the standards of the Code of Practice have been independently assessed by competent bodies.

Codes of Practice and inspections

Where a Code of Practice says an operator must have an inspection, then a COMAH inspection will not always suffice. The CA does inspect against Codes of Practice, but because the CA focuses its resource against measures relevant to Major Accidents, it may not inspect against the full requirements of all codes or standards relevant or applicable to the operation or undertaking.

So, where an establishment has been inspected by the CA for its COMAH activities, the activity of sale and supply pesticide stores will still require an independent inspection to satisfy the requirements of the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry.

Relationship between BASIS scheme and COMAH

The requirements of the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry (compliance with which is checked through the BASIS Store Inspection Scheme or another independent

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

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inspection) and COMAH are related but not mutually exclusive - they complement each other, in a similar way to other regimes such as Environmental Permitting.

As such, there is no opt out of compliance with the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry for pesticide stores that are required to notify under the COMAH regime, as explained below:

- Compliance with the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry helps to ensure that various pieces of legislation relating to sale and supply pesticide stores are complied with.
- Participation in the BASIS Store Inspection Scheme satisfies the requirements of the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry which the COMAH regime does not. Operators of sale and supply pesticide stores not participating with the BASIS scheme must still ensure an independent inspection of their store is carried out in order to comply with the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry.
- For COMAH, we may conclude that a measure in a Code of Practice is not applicable when considering Major Accident control. This does not mean it is not required at all, or that it confers no benefit, it may simply relate to more minor accident hazards.
- Individual COMAH officers audit within their area of expertise and any single inspection where no non-compliances are found cannot be interpreted to be a full demonstration of compliance with all requirements, including compliance with the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry.
- COMAH recognises involvement in the BASIS Store Inspection Scheme as evidence of adoption of good practice. Other relevant good practice includes the CIRIA guidance 'C736 Containment Systems for the Prevention of Pollution', which is also required by the BASIS Store Inspection Scheme.
- COMAH concentrates on major accident hazards, so lesser hazards and their mitigation may not be recognised. These 'lesser' hazards associated with sale and storage of pesticides are picked up in the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry and addressed in the BASIS Store Inspection Scheme, alongside other related regulatory aspects such as waste duty of care. It is highly likely that requirements of the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry may not be covered during COMAH CA interventions because of the major accident focus.¹

This guidance note will be reviewed annually, and also in response to the publication of any updates or revisions to the Code of Practice.

For more information consult the publications here <http://www.hse.gov.uk/comah/ca-guides.htm> and <http://www.hse.gov.uk/pubns/books/1111.htm>

Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture & Forestry (published 1998) http://www.hse.gov.uk/pesticides/resources/Y/yellow_code.pdf

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

www.gov.uk/environment-agency

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Appendix 2

Andy Richardson – Independent Chairman

Lucy Geddes – EA Representative

Martin Ball – CRD Representative

Richard Cullen – Distributor Representative

Hazel Doonan – AIC Representative

Mark Dempsey – Local Authority Representative

Matt Whieldon – CPA Representative

Rob Mackie – Chief Fire Officers Association (CFQA)

John Waterhouse – AIC Representative

Stephen Jacobs – BASIS Chief Executive Officer

Lindsay Smith-Boam – BASIS Logistics Manager

Appendix 3

Forestry Commission Nominated Storekeeper Checklist

<http://www.basis-reg.co.uk/Portals/1/Resources/Distributor%20Area/FC%20NSK%20Check%20List%20for%20Storekeepers.pdf>

Nominated Storekeeper Checklist

<http://www.basis-reg.co.uk/Portals/1/Resources/Distributor%20Area/NSK%20Check%20List%20for%20Storekeepers.pdf>

Small Stores Nominated Storekeeper Checklist

<http://www.basis-reg.co.uk/Portals/1/Resources/Distributor%20Area/Small%20Store%20NSK%20Checklist.pdf>

All checklists can also be found using the web link below:

<http://www.basis-reg.co.uk/Schemes/BASIS-Scheme/Distributor-Area>