

The Campaign for Responsible Rodenticide Use (CRRU) UK

The CRRU Point of Sale Work Group

Proof of Competence Documents: Question and Answer 2016

General

Q 1	Why are these documents necessary?
A 1	Effective proof of competence controls at the point of sale is a central requirement from the UK Regulatory Authority, CRD/HSE, for the implementation of a Stewardship Regime for Professional Use Rodenticides. Without these controls in place, Stewardship, and hence the authorisation, sale and use of these products, could not proceed.
Q 2	When do these documents come into force?
A 2	Professional Use Rodenticides which have Stewardship conditions attached to them will start to become available for sale to the market from 1st April 2016 onwards, and point of sale checks & controls must be in place by then for these products.

DOCUMENT 1 : FOR SUPPLY CHAIN PARTNERS **SUPPLY CHAIN COMPLIANCE DECLARATION**

Q 3	Who needs to fill in the Supply Chain Compliance Declaration?
A 3	Any company in the Supply Chain who wishes to purchase Professional Use Rodenticides which have Stewardship conditions attached to them, and which intends to sell these either to End Users of the products, or to companies who in turn will be selling the products onwards, will need to complete a Supply Chain Compliance Declaration, or equivalent, committing them to delivering Stewardship.
Q 4	What is deemed as 'equivalent' to the Supply Chain Compliance Declaration?
A 4	Some Supply Chain companies may decide to incorporate all the elements of the Supply Chain Compliance Declaration within their formal supply contracts. Provided these supply contracts capture all the elements of the Supply Chain Compliance Declaration, these contracts will be considered as 'equivalent'.
Q 5	How many Supply Chain Compliance Declarations does a company in the supply chain which will be selling on the products, have to fill in?
A 5	Every supplier company has the responsibility to ensure that all of their customers which will be selling on the Professional Use Rodenticides which have Stewardship conditions attached to them, has completed a Supply Chain Compliance Declaration, or equivalent. Therefore each supplier company will require a declaration from each of their Supply Chain channel partners.
Q 6	Who has the responsibility for holding/retaining records of the Supply Chain Compliance Declaration?
A 6	This is the responsibility of the upstream supplier company in each case.
Q 7	What happens if a Supply Chain partner breaches the terms of the Supply Chain Compliance Declaration?
A 7	As set out in the declaration, failure to adhere to the requirements of the declaration, and failure to demonstrate compliance with the declaration when reasonably required, may result in the withdrawal of supply of Professional Use Rodenticides which have Stewardship conditions attached to them.
Q 8	Who has responsibility for ensuring that Supply Chain partners are adhering to the requirements of the Supply Chain Compliance Declaration?
A 8	This is the responsibility of the supplier company.
Q 9	Will supply chain partners be given notification of a check by their supplier?
A 9	In the case of on-site checks, this is a matter for the supplier and Supply Chain partner to agree, however it is reasonable to expect that notification should be given, and a mutually acceptable timetable agreed, which should be held in a timely manner. In the case of "mystery shopper" type checks by the supplier, no notification is required.

Q 10	What evidence will be asked for during a check?
A 10	This is for the supplier and Supply Chain partner to agree, however it is reasonable to expect that this will include random checks on customer documentation to ensure that the correct Declarations are in place. The supplier may also ask for an explanation of what checking processes are in place in day to day ordering to ensure that the necessary Point of Sale controls are in place.
Q 11	Can a Supply Chain partner refuse a check by a supplier, and what are the consequences of this?
A 11	There is no legal obligation for a Supply Chain partner to agree to a check by their supplier. If, however, the supplier cannot satisfy themselves that their supply chain partner is adhering to the Supply Chain Compliance Declaration, then this may lead to the supplier ceasing to supply Professional Use Rodenticides which have Stewardship conditions attached to them.
Q 12	How long should suppliers retain copies of the Supply Chain Compliance Declarations?
A 12	Suppliers must retain copies of Supply Chain Compliance Declarations for as long as they continue working with the Supply Chain partner and their account remains open, or until such time that the declaration is amended or updated.
Q 13	How will internet purchases work?
A 13	All internet sellers of Professional Use Rodenticide products which have Stewardship conditions attached to them will need to adhere to the same Point of Sale checks as any other supplier. "Self-declarations" of compliance by customers is not enough – the internet seller must have copies of CRRU Approved Certificates or Farm Assurance Scheme membership prior to selling, in the same way as any other supply chain outlet.
Q 14	Who has the responsibility of checking that internet sellers are complying with the Stewardship conditions?
A 14	It is the responsibility of the company supplying to the internet seller to ensure that the internet seller understands, signs and complies with the Supply Chain Compliance Declaration.

DOCUMENT 2 : FOR CERTIFICATED USERS

CRRU APPROVED CERTIFICATION DECLARATION

Q 15	Where can I access the list of CRRU Approved Certificates?
A 15	The list of CRRU Approved Certificates is available on the CRRU website, and must be checked on a frequent and regular basis by suppliers. http://www.thinkwildlife.org/stewardship-regime/
Q 16	Who is the “senior person in authority” at an organisation?
A 16	This is a person with management responsibility for the Certificated Users. This can be a range of people, such as the owner of a small business, or in a larger organisation it might be the Operations Manager/Director.
Q 17	Are trainees who are not yet Certificated, but are working under the direction of a Certificated User, allowed to purchase or use professional use rodenticides with Stewardship conditions?
A 17	No. Only when the trainee has achieved the required Certification are they allowed to purchase or use professional use rodenticides with Stewardship conditions.
Q 18	In using this Declaration form, why are suppliers not required to receive copies of certification for all potential users?
A 18	There is recognition that a proportionate balance is needed, in that the declaration form covers a very wide range of potential user companies/organisations. Constant changes in staff at organisations would make administration by suppliers very challenging.
Q 19	Why do suppliers require the nomination of all delivery addresses for a User company/organisation?
A 19	This, coupled with the requirement for certification details for at least one Certificated User at each delivery address, ensures that suppliers know that a User company/organisation has the required Proof Of Competence in place for each and every location to which it delivers professional use rodenticides with Stewardship conditions.
Q 20	Why are User companies/organisations given the option in the declaration to list a Named Purchaser/Collector?
A 20	It is recognised that in some instances, User companies/organisations may need a person to purchase or collect on the behalf of a Certificated User.
Q 21	In the case of a Named Purchaser/Collector, does this person need to be certificated?
A 21	No, provided they are purchasing or collecting on the behalf of a Certificated User, as already set out in the declaration.
Q 22	How many Certification Declarations does a User company/organisation have to fill in?
A 22	One completed Certification Declaration form will be required for each supplier from which the User company/organisation intends to purchase Rodenticides which have Stewardship conditions attached to them.
Q 23	Who has the responsibility for holding/retaining records of the Certification Declaration?
A 23	This is the responsibility of the supplier company in each case.

Q 24	How long should suppliers retain copies of the Certification Declarations?
A 24	Suppliers must retain copies of Certification Declarations for as long as the customer account remains open, or until such time that the declaration is amended or updated.
Q 25	What happens if a User company/organisation breaches the terms of the Certification Declaration?
A 25	Failure to adhere to the requirements of the declaration may result in the withdrawal of supply of Professional Use Rodenticide products which have Stewardship conditions attached to them. In addition, failure to comply with the product label could have legal implications.
Q 26	What happens if the customer supplies incorrect or false information to the supplier?
A 26	The supplier should immediately cease supply of all Professional Use Rodenticides which have Stewardship Conditions attached to them.
Q 27	Who has responsibility for ensuring that User companies/organisations are adhering to the requirements of the Certification Declaration?
A 27	This is the responsibility of the supplier company to ensure that the initial declaration and associated documentation is completed correctly. It is also expected that suppliers will, as a matter of best practice, check with customers on a regular basis that there have been no material changes to the declaration.
Q 28	Is photo ID needed?
A 28	If a customer is already known to the supplier, and has an existing account, then photo ID is not needed. If, however, the customer is either a cash account, or a new account, then photo ID (eg passport, driving licence) is needed in conjunction with the certification in order to prove the identity of the new customer.
Q 29	Who is responsible for ensuring that Certification Declarations are kept up to date?
A 29	It is the responsibility of the certificate holder to notify the supplier if there are changes to certification status or nominated purchasers / collectors.
Q 30	Who is responsible for collating and keeping declaration forms where a certificated user is a member of a Buying Group which orders Professional Use Rodenticides which have Stewardship Conditions attached to them on behalf of their customers?
A 30	In this instance it is the responsibility of the Buying Group as the purchaser to ensure that all such members of the Buying Group complete the CRRU Approved Certification Declaration in the first instance. It is also the responsibility of the Buying Group to ensure that all members of the Buying Group continue to be compliant in future.

DOCUMENT 3 : FOR FARM ASSURANCE SCHEMES

CRRU ALIGNED FARM ASSURANCE SCHEME DECLARATION

Q 31	Who can sign the declaration?
A 31	Only the person named on the Farm Assurance Scheme membership.
Q 32	Which Farm Assurance Schemes are CRRU Aligned?
A 32	The list of CRRU Aligned Farm Assurance Schemes is available on the CRRU website, and must be checked on a frequent and regular basis by suppliers. http://www.thinkwildlife.org/stewardship-regime/
Q 33	Why are Farm Assurance Scheme members given the option in the declaration to list a Named Purchaser/Collector?
A 33	It is recognised that in some instances, Farm Assurance Scheme members may need a person to purchase or collect on the behalf of the Farm Assurance Scheme member.
Q 34	Who can use the Professional Use Rodenticides which have Stewardship conditions attached to them which have been supplied under a CRRU Aligned Farm Assurance Scheme Declaration?
A 34	Only staff conducting rodent control at the farm which is the Farm Assurance Scheme member, and when they follow the Farm Assurance Scheme protocol for rodent control.
Q 35	How many Farm Assurance Scheme Declarations does a Farm Assurance Scheme member have to fill in?
A 35	One completed declaration form will be required for each supplier from which the CRRU Aligned Farm Assurance Scheme member intends to purchase Rodenticides which have Stewardship conditions attached to them.
Q 36	Who has the responsibility for holding/retaining records of the CRRU Aligned Farm Assurance Scheme Declaration?
A 36	This is the responsibility of the supplier company in each case.
Q 37	How long should suppliers retain copies of CRRU Aligned Farm Assurance Scheme Declarations?
A 37	Suppliers must retain copies of CRRU Aligned Farm Assurance Scheme Declarations for as long as the customer account remains open, or until such time that the declaration is amended or updated.
Q 38	What happens if a Farm Assurance Scheme member breaches the terms of the CRRU Aligned Farm Assurance Scheme Declaration?
A 38	Failure to adhere to the requirements of the declaration, may result in the withdrawal of supply of Professional Use Rodenticide products which have Stewardship conditions attached to them.
Q 39	Who has responsibility for ensuring that Farm Assurance Scheme members are adhering to the requirements of the CRRU Aligned Farm Assurance Scheme Declaration?
A 39	This is the responsibility of the supplier company to ensure that the initial declaration and associated documentation is completed correctly. It is also expected that suppliers will, as a matter of best practice, check with customers on a regular basis that there have been no material changes to the declaration.

Q 40	How can supplier companies ensure that membership of aligned Farm Assurance Schemes is still current?
A 40	All Aligned Farm Assurance Schemes issue membership certificates on an annual basis, and so supplier companies need to take note of membership expiry dates, and ask for copies of new membership certificates either annually in the case of regular customers, or at the time of sale for infrequent customers. In addition, some Farm Assurance Schemes operate online membership checking services in real time, and suppliers may opt to use these where they are available.
Q 41	What happens if a Farm Assurance Scheme does not align its rodent control standards in line with the CRRU Code of Best Practice by no later than end December 2017?
A 41	Any Farm Assurance Scheme which does not have its rodent control standards aligned with the CRRU Code of Best Practice by end December 2017 can no longer be used as Proof Of Competence to allow the purchase of Professional Use Rodenticide products which have Stewardship conditions attached to them.
Q 42	How will suppliers be made aware of which Farm Assurance Schemes remain CRRU Aligned beyond December 2017?
A 42	It is the responsibility of suppliers to regularly check the CRRU website for updates to the list of CRRU Aligned Farm Assurance Schemes. In addition, regular communications and updates of changes to the list of CRRU Aligned Farm Assurance Schemes are expected to be made both by CRRU and by key Agricultural stakeholder organisations.
Q 43	Is photo ID needed?
A 43	If a customer is already known to the supplier, and has an existing account, then photo ID is not needed. If, however, the customer is either a cash account, or a new account, then photo ID (eg passport, driving licence) is needed in conjunction with the Farm Assurance Scheme membership in order to prove the identity of the new customer.
Q 44	Who is responsible for collating and keeping declaration forms where a farmer is a member of a Buying Group which orders Professional Use Rodenticides which have Stewardship Conditions attached to them on behalf of their customers?
A 44	In this instance it is the responsibility of the Buying Group as the purchaser to ensure that all such members of the Buying Group complete the CRRU Aligned Farm Assurance Scheme Declaration in the first instance. It is also the responsibility of the Buying Group to ensure that all members of the Buying Group continue to be compliant in future.



VERSION 1: DECEMBER 2015