FSC Pesticides Policy and HIRP

Stuart Wilkie
Scottish Woodlands
UKWAS Director/ HIRP Chair

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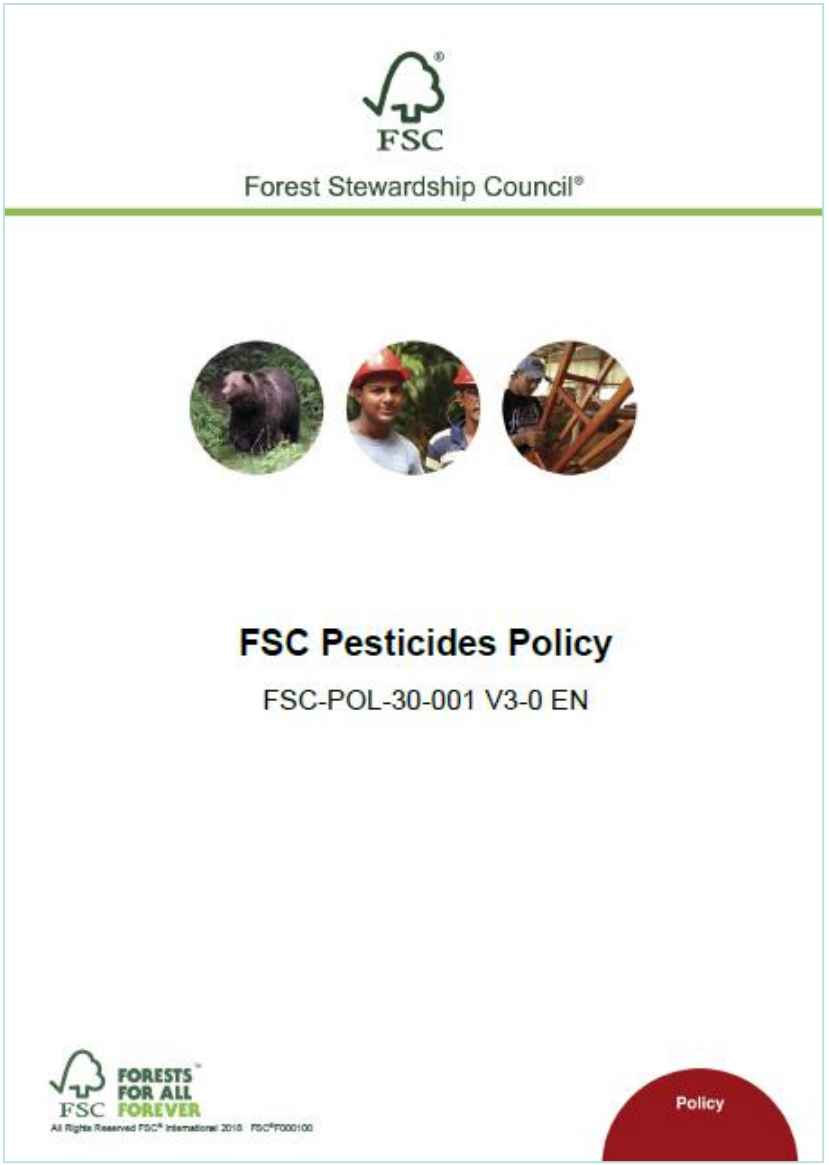
Introduction

Effective from 1st August 2019.

Transition period ended 31st December 2020.

We should have been complying from 1st January 2021.

We are a year in. How do you demonstrate compliance?



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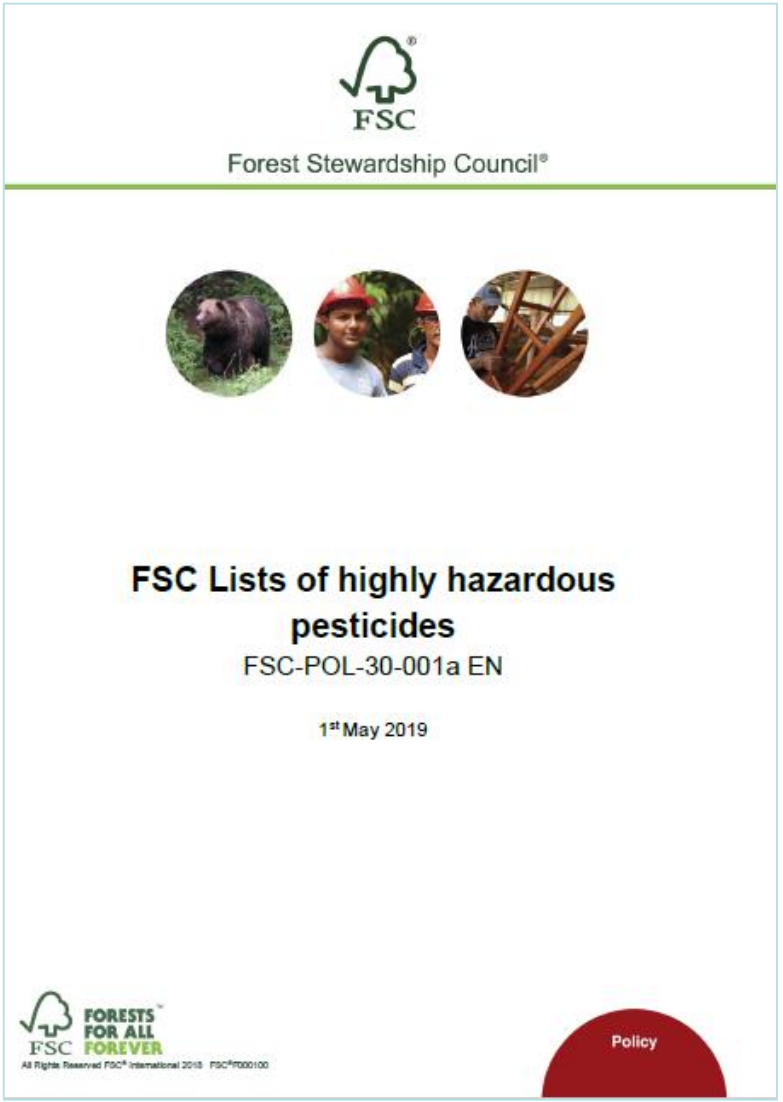
Background

- FSC would prefer we did not use pesticides but realise that this is not always feasible.
- Pesticides should be used only as a last resort
- Pesticides have been ranked by FSC according to their toxicity measured against internationally recognised criteria.



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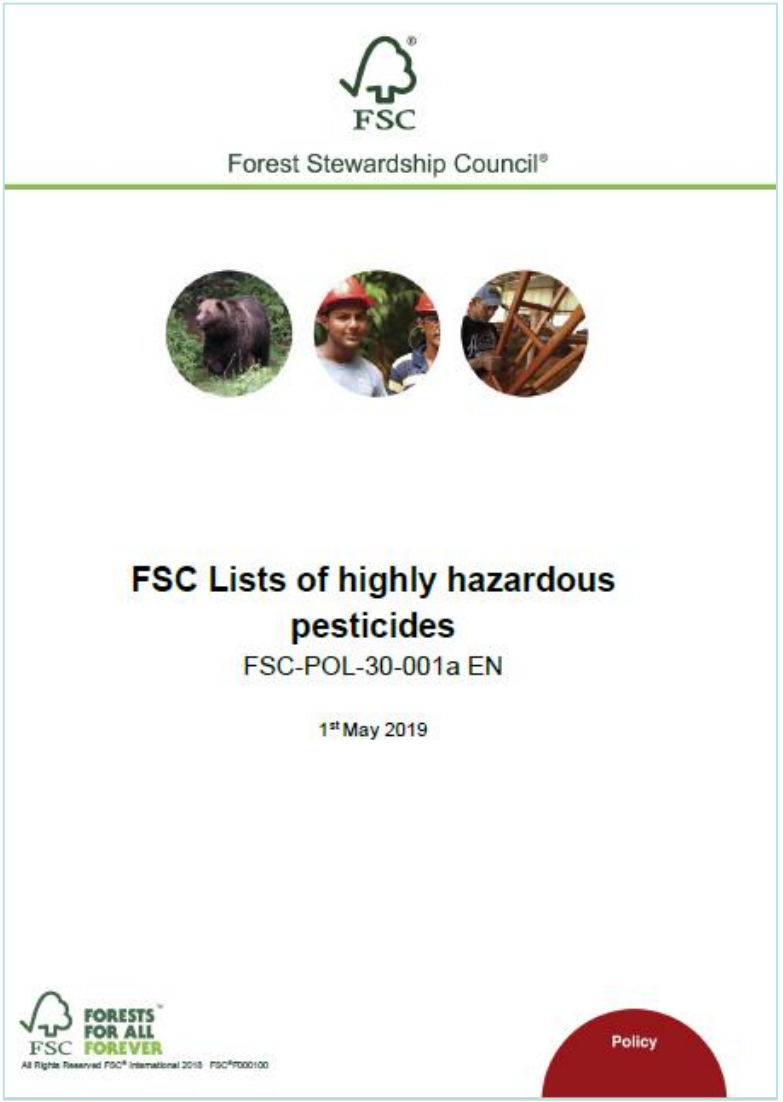
Highly Hazardous Pesticides

Hazard group	Number	Criteria
Relevant International Agreements or conventions	1	Relevant International Agreements or conventions
Acute toxicity	2	Acute toxicity to mammals and birds
Chronic toxicity	3	Carcinogenicity
	4	Mutagenicity to mammals
	5	Developmental and reproductive toxicity
	6	Endocrine disrupting chemical (EDC)
Environmental toxicity	7	Acute toxicity to aquatic organisms
	8	Persistence in soil or water and low sorption potential and bio-magnification and bio-accumulation
Dioxins	9	Dioxins (residues or emissions)
Heavy metals	10	Heavy metals



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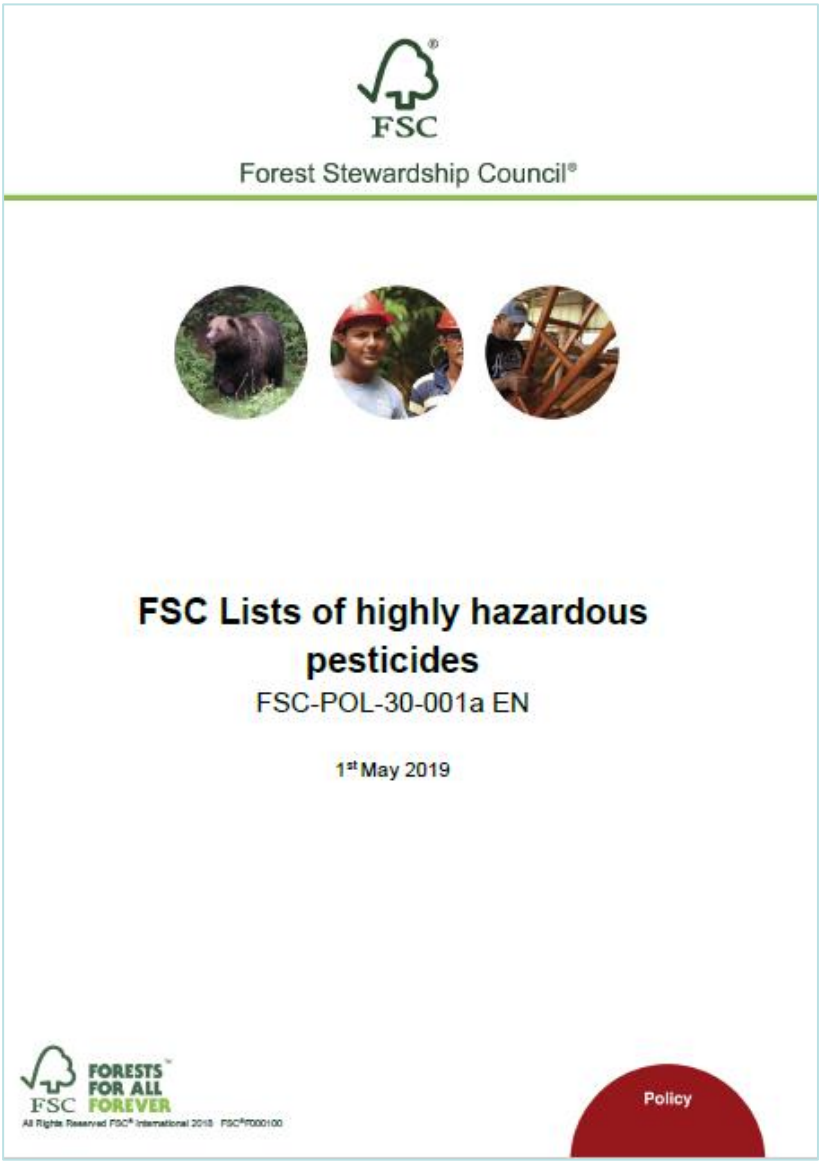
Highly Hazardous!

- Prohibited
- None in UK

- Highly Restricted
- e.g. Cypermethrin

- Restricted
- e.g. Acetamiprid and Glyphosate

- Unclassified
- e.g. Propyzamide



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FSC Policy

Two main parts

1. Integrated Pest Management (IPM)

2. Environmental and Social Risk Assessment (ESRA)

UKWAS 5 Requirements

3.4.1a) **Integrated pest management** (IPM) is used, giving priority:

- Firstly, to management practices which avoid pest problems
- Secondly, to non-chemical pest control methods including biological control agents
- Lastly, to chemical pesticides.

3.4.2 a) Where chemical control methods are considered necessary, an **environmental and social risk assessment** is prepared at WMU level.

b) This risk assessment process selects the pest control option that, relative to other options, broadly demonstrates:

- The least social and environmental damage
- Greater effectiveness, and
- Equal or greater social and environmental benefit.

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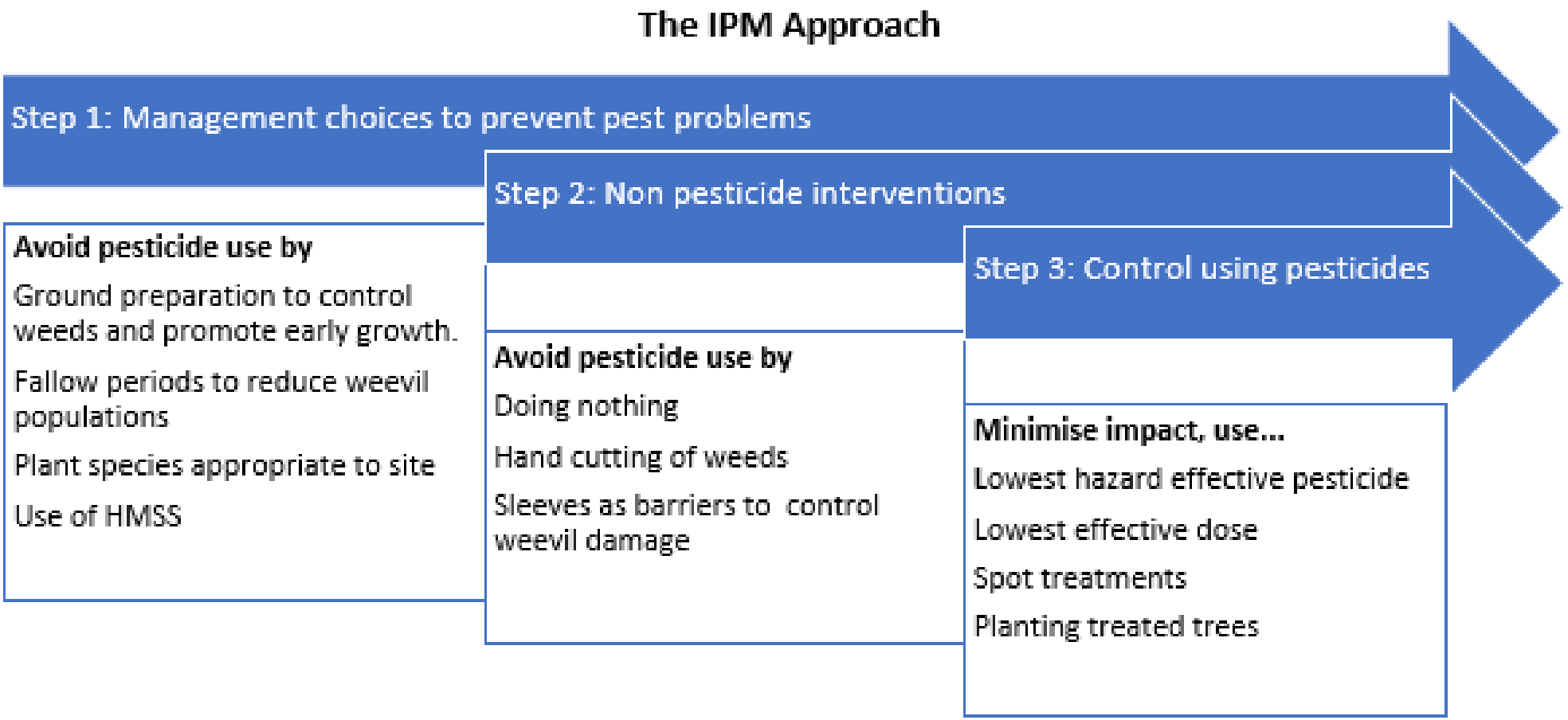
IPM (Integrated Pest Management)



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How does HIRP fit in?

1. Develop an improved predictive Hylobius abietis population model, appropriate for use in all forest situations.
2. Create a regularly updated guide on Hylobius abietis integrated pest management for use by all stakeholders across the sector.
3. Develop alternatives to chemicals that work in areas of high Hylobius abietis population, including physical barrier products.
4. Develop a viable biocontrol option – using insect pathogenic organisms such as fungi and nematodes that prey on and kill Hylobius abietis.
5. Use tree genetics to identify resistance characteristics in SS with a view to breeding more resistant planting stock.
6. Identify a range of alternative, weather resistant, non-neonicotinoid pesticides, that have low environmental impact, and that might be used as a last resort if other methods of non-chemical protection fail

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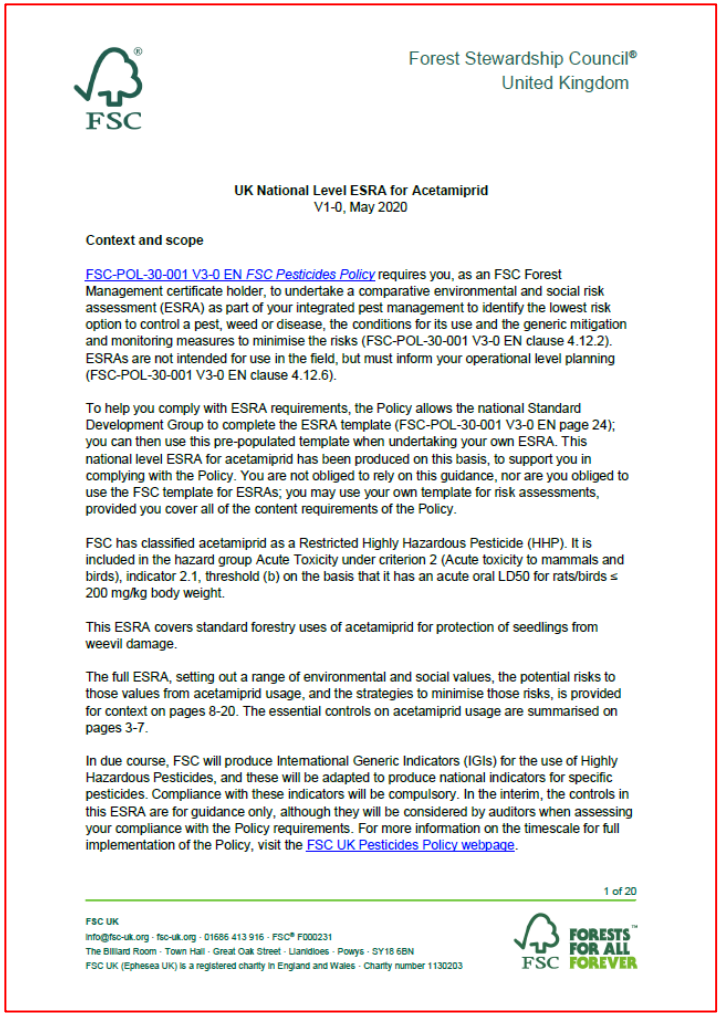
Environmental and Social Risk Assessment

The ESRA

These are available from the FSC UK website if you are interested. Runs to 20 pages.

The important bit is the list of controls



Forest Stewardship Council®
United Kingdom

UK National Level ESRA for Acetamiprid
V1-0, May 2020

Context and scope

FSC-POL-30-001 V3-0 EN *FSC Pesticides Policy* requires you, as an FSC Forest Management certificate holder, to undertake a comparative environmental and social risk assessment (ESRA) as part of your integrated pest management to identify the lowest risk option to control a pest, weed or disease, the conditions for its use and the generic mitigation and monitoring measures to minimise the risks (FSC-POL-30-001 V3-0 EN clause 4.12.2). ESRAs are not intended for use in the field, but must inform your operational level planning (FSC-POL-30-001 V3-0 EN clause 4.12.6).

To help you comply with ESRA requirements, the Policy allows the national Standard Development Group to complete the ESRA template (FSC-POL-30-001 V3-0 EN page 24); you can then use this pre-populated template when undertaking your own ESRA. This national level ESRA for acetamiprid has been produced on this basis, to support you in complying with the Policy. You are not obliged to rely on this guidance, nor are you obliged to use the FSC template for ESRAs; you may use your own template for risk assessments, provided you cover all of the content requirements of the Policy.

FSC has classified acetamiprid as a Restricted Highly Hazardous Pesticide (HHP). It is included in the hazard group Acute Toxicity under criterion 2 (Acute toxicity to mammals and birds), indicator 2.1, threshold (b) on the basis that it has an acute oral LD50 for rats/birds ≤ 200 mg/kg body weight.

This ESRA covers standard forestry uses of acetamiprid for protection of seedlings from weevil damage.

The full ESRA, setting out a range of environmental and social values, the potential risks to those values from acetamiprid usage, and the strategies to minimise those risks, is provided for context on pages 8-20. The essential controls on acetamiprid usage are summarised on pages 3-7.

In due course, FSC will produce International Generic Indicators (IGIs) for the use of Highly Hazardous Pesticides, and these will be adapted to produce national indicators for specific pesticides. Compliance with these indicators will be compulsory. In the interim, the controls in this ESRA are for guidance only, although they will be considered by auditors when assessing your compliance with the Policy requirements. For more information on the timescale for full implementation of the Policy, visit the FSC UK Pesticides Policy webpage.

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Info@fsc-uk.org · fsc-uk.org · 01686 413 916 · FSC® F000231
The Billiard Room · Town Hall · Great Oak Street · Llanidloes · Powys · SY18 6BN
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ESRA – List of Controls

Exposure Elements	Minimum list of values	Description of why/why not a risk	Mitigation strategies defined to minimize risk	Controls
			Overview From the descriptions of risk, it is clear that the principal issues are worker safety/welfare and the potential for the contamination of water. Mitigation strategies are focussed on these key risks, but also address the other, lesser risks identified: the potential impacts on non-target insect species, the potential for the contamination of wild foods, and effects on public access. **General strategies** While this ESRA comes at a point in the IPM process where it has already been decided that the use of acetamiprid is necessary, most of the risks described can be mitigated to some degree by minimising the volume used, in terms of the number of seedlings treated, the volume applied to each seedling, and the frequency of application. For this reason, the overarching UKWAS requirement to minimise pesticide use (UKWAS 3.4.1(b) [FSC 10.7.2]) is a key general mitigation strategy. This is monitored via UKWAS 3.4.3 [FSC 10.7.8]. Mitigation of risks to worker safety and water, as well as risks such as poorly targeted applications affecting non-target insect species, can be achieved largely through conformance to FISA Safety Guide 202 *Application of pesticides by hand-held equipment*, which addresses the following issues: • Certificates of competence, • Personal protective equipment (PPE) and hygiene requirements, • The applicator, • Emergency procedures, • Planning to spray, • Preparing to spray, • Spraying, • After spraying, and	**Ace.1** Operations conform to FISA Safety Guide 202 *Application of pesticides by hand-held equipment*. Guidance note: *Owners/managers may also find it useful to refer to* Pesticides: Code of practice for using plant protection products *in England and Wales,* Pesticides: Code of practice for using plant protection products in Scotland, *or* Pesticides: Code of practice for using plant protection products *in Northern Ireland.* **Ace.2** Operators hold NPTC PA1 and PA6 certificates of competence or LANTRA equivalents. **Ace.3** There is an appropriate COSHH assessment. **Ace.4** Operators comply with the requirements and relevant recommendations of the product label and the extension of authorisation for a minor use of a plant protection product.

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ESRA – List of Controls

Ace.1 Operations conform to FISA Safety Guide 202 Application of pesticides by hand-held equipment.

Ace.2 Operators hold NPTC PA1 and PA6 certificates of competence or LANTRA equivalents.

Ace.3 There is an appropriate COSHH assessment.

Ace.4 Operators comply with the requirements and relevant recommendations of the product label and the extension of authorisation for a minor use of a plant protection product

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ESRA – List of Controls

Exposure Elements	Minimum list of values	Description of why/why not a risk	Mitigation strategies defined to minimize risk	Controls
			• Weather conditions. Checking conformance with FISA202 ensures adherence to the COSHH assessment (i.e. an assessment carried out in accordance with the Control of Substances Hazardous to Health Regulations 2002); the use of a suitable, properly maintained and calibrated applicator; appropriate emergency planning and safety signage; safe transport and storage; and appropriate waste disposal. Most of this will be achieved through suitable contracts and supervision. All risks are mitigated to some degree by appropriate operator training, as evidenced by certificates of competence. All operators working with acetamiprid should hold the National Proficiency Tests Council (NPTC) or Scottish Skills Testing Service (SSTS) certificates PA1 (Foundation module) and PA6 (Hand-held applicators) or LANTRA equivalents. PA1 leads to the following outcomes: • Outcome 1. Know the legislative requirements and codes of practice relating to the use of pesticides • Outcome 2. Understand the relevance of product information • Outcome 3. Know how to minimise the risk of human contamination and implement emergency procedures • Outcome 4. Know how to store and transport pesticides safely • Outcome 5. Know how to manage and dispose of surplus pesticide and waste materials • Outcome 6. Know the record keeping requirements • Outcome 7. Know how to minimise the risk of environmental contamination and implement emergency procedures	**Ace.5** Records of acetamiprid usage are maintained, including trade name, active ingredient, quantity of active ingredient used, period of use, number and frequency of applications, location and area of use, and reason for use. These records are kept for a minimum of five years. **Ace.6** There is awareness of research into chemical and non-chemical alternatives to acetamiprid carried out by Forest Research, the Hylobius Industry Research Programme or other agencies. *Guidance note: Owners/managers should refer to the Forest Research note* Interim guidance on the integrated management of *Hylobius abietis* in UK forestry. **Ace.7** Individual certificate holders or group schemes with a total certified area of more than 5,000 hectares provide financial or in kind contributions to research into chemical and non-chemical alternatives to acetamiprid

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How does HIRP fit in?

Ace.6 There is awareness of research into chemical and non-chemical alternatives to acetamiprid carried out by Forest Research, the Hylobius Industry Research Programme or other agencies.

Ace.7 Individual certificate holders or group schemes with a total certified area of more than 5,000 hectares provide financial or in kind contributions to research into chemical and non-chemical alternatives to acetamiprid carried out by Forest Research, the Hylobius Industry Research Programme or other agencies.

Guidance note: In kind contributions may include providing sites for field trials.

While large enterprises and other owners/managers may consider carrying out their own investigations into chemical and non-chemical alternatives to acetamiprid, to maximise the benefits of such investigations they should be coordinated with the work of agencies and other owners/managers wherever possible.

Concluding Remarks?

Membership of, and contribution to the work of HIRP is fully aligned with FSC pesticide requirements and is a means of demonstrating compliance.

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Thank you

Stuart Wilkie
Environment and
Certification Manager

E: stuart.wilkie@scottishwoodlands.co.uk
W: www.scottishwoodlands.co.uk

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