



Control Union Certifications (CU)

UK STAKEHOLDER CONSULTATION

Temporary Derogation for Propyzamide (Kerb) for forestry use

Start of consultation: Monday October 22nd 2007

Deadline for stakeholder comments: Friday 30th November 2007

CU is seeking stakeholder views on the use of Propyzamide - a remedial control measure for grass and herbaceous weed control.

This herbicide is currently listed by FSC (Forestry Stewardship Council www.fsc.org) as a Highly Hazardous Pesticide (see FSC Pesticides Policy: Guidance On Implementation FSC-GUI-30-001 Version 2-0 EN May 5, 2007).

Propyzamide has a temporary derogation from FSC for use in FSC certified forests until December 2007. For its continued use, derogation applications must be submitted by certificate holders with stakeholder comments. It is anticipated that continued temporary derogation will be awarded by FSC for a maximum 5 year period in early 2008.

CU on behalf of its certificate holders has prepared this consultation paper to determine continued temporary derogation for Propyzamide.

The responses from this consultation exercise will be collated by CU and submitted with derogation applications (2 part document – first part details the chemical and demonstrates need, second part details the certificate holder and justified use, and certification body) to FSC Policy and Standards Unit who will check applications and seek guidance as required from FSC Technical Advisors. Any recommendation for approval is passed to FSC Pesticides Committee.

Stakeholder views

Your comments are invited and in particular concerning the following points:

- ❖ Is this pesticide necessary in UK forestry?
- ❖ Are there alternatives which are economically viable, current research?
- ❖ What controls could be taken to minimise use?
- ❖ What would be the impact if derogation was not approved?
- ❖ Do you object to or support the use of this pesticide, and why?

Stakeholder views form an integral part of the derogation application process, if you are aware of any opinions held by other stakeholders please forward this consultation paper.

It is important that all those with a view or interest in the use of this chemical make an input to this consultation and your views are encouraged.

Technical details on Propyzamide

Forestry Commission Practice Guide Reducing Pesticide Use in Forestry (2004)

Active Ingredient (Herbicide)	Mode of Action:	Product name
Propyzamide	Herbicide (granular and liquid formulation)	Kerb

Refer to: **Table 2.1** Pesticide characteristics P114

Efficacy	Environmental risks	Comments
Very effective grass weedkiller. Controls established grass, and gives residual control.	Selective – few established herbaceous or woody species affected. Not hazardous to mammals or insects.	Effective winter weed treatment: offers long-term control, with good tree tolerance.

Refer to:

Table 1.7 Remedial control measures for grass and herbaceous weed control: new planting and restocking (continued). P56

Table 1.8 Remedial control measures for grass and herbaceous weed control: new planting on lowland arable or improved P63

Propyzamide has been a commonly used and important herbicide in UK forestry and has advantages over other herbicides in its ability to be used in wet weather when applied in granular form.

Health and Safety requirements specify application methods and UKWAS (UK Woodland Assurance Standard) has additional requirements concerning justification for use, also requiring that best practice guidelines are adhered to including no application within recommended distances of watercourses, and maintaining records of use for area applied to and amount of chemical used. This forms part of the FSC inspection process carried out by CU prior to approving any forest for FSC certification.

Returning stakeholder responses

Stakeholder responses should be returned by FAX or E-MAIL

Responses should be titled [Temporary Derogation for Propyzamide](#)

General stakeholder Responses should be sent to:

Control Union Certifications, Head Office, The Netherlands
Esther Hilhorst

FAX: 00 31 38 423 7040. The derogation application can be e-mailed to

E-mail: ehilhorst@controlunion.com

Individual CU client responses can be sent to the above or to:

Control Union Certifications
UK Certifications Manager
Paul Sandys

FAX: 08707 525 680

E-mail: psandys@controlunion.com

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