

SGS QUALIFOR and Soil Association WOODMARK

Public Consultation Exercise

FSC International ‘Highly Hazardous’ Pesticides Procedure - **Propyzamide**
Temporary Derogation application for SGS and Soil Association FSC certificate holders in the UK.

Start Date for Consultation – 12 October 2007

[End Date for Consultation – 26 November 2007](#)

Background

SGS Qualifor and Soil Association Woodmark have been preparing a draft joint application for temporary derogation of the pesticide Propyzamide (KERB etc.) on behalf of a number of their UK clients who have requested it. The product has become classified by FSC as “highly hazardous”¹. (¹as defined under FSC International rules – see annex 2 FSC Guidance Document FSC-GUI-30-001 “FSC pesticides Policy” available on their website www.fsc.org).

Active Ingredient	Product Name	Notes
Current status: temporarily derogated until 30 th December 2007*		
Propyzamide	KERB etc.	Granular and liquid herbicide for forestry use
*Use of this chemical is covered by a temporary derogation which is expected to continue while new applications are determined. Any FSC certificate holder who has NOT submitted an application for derogation will no longer be able to use the chemical from January 2008.		

Consultation invited

SGS Qualifor and Soil Association Woodmark invite your comments and consultation responses on the proposed Temporary Derogation application for Propyzamide.

Key questions covered by the Temporary Derogation application:

- Is this pesticide necessary in UK Forestry? And if so why?
- Are there any viable alternatives currently available? And if so what are they?
- What would be the economic impact if derogation were not achieved?
- What actions are currently being taken to minimise usage of such pesticides?
- What opinions do other stakeholders (e.g. environmental, social) hold?

Consultees’ comments form an important part of the application and therefore must be obtained prior to the final version of the application. To explain to those consultees without technical knowledge or familiarity of the product, the following summary of the key points of the draft application are as follows:

For many years Propyzamide has been one of the most commonly used herbicides in UK forestry. It is considered a very important tool for effective and economic forest management. It is applied in either granular or liquid form. Under existing safety and environmental legal requirements it must be applied safely both in respect to the environment, the public and the operator. Under existing FSC/UKWAS certification requirements, additional best practice guidelines must be followed including no application within recommended distances of watercourses.

The Forest Research branch of the Forestry Commission gives decision support guidance to managers on appropriate and selective use of pesticides and is a key reference document for UKWAS certification. FC Research describes Propyzamide as follows within its Practice Guide 'Reducing Pesticide Use in Forestry' (pub.2004):

“Efficacy - Very effective grass weed killer. Controls established grass and gives residual control.

Environmental risks – Selective, few established herbaceous or woody species affected. Not hazardous to mammals or insects.

Comments – Effective winter weed treatment, offers long term control with good tree tolerance.”

Forest managers make the following further comments:

Young Tree Establishment

Propyzamide allows for the elimination of grass competition before growth starts, so it can be more effective than May/June applications of Glyphosate. In granular form it allows work in wet/frosty and windy weather (when it may not be possible to spray other herbicides). It is therefore the only effective chemical to control grass in the dormant season to give residual control.

Environmental impact

Propyzamide use is limited to grass only as it species selective unlike Glyphosate. The amount used per tree is very small and only a very small area around each tree is treated.

Economic & Social benefits

Its use allows work during the winter months and so it is very helpful in spreading work, keeping contractors engaged throughout the year and achieving important work programmes. As well as being an effective chemical, it gives the manager flexibility so that essential weed control can be carried out in the Autumn / Winter, when labour resources are available, rather than only use a chemical such as Glyphosate which would usually be applied in late spring / early summer and clash with tree planting and weevil control obligations causing potential workload problems for management.

The product manufacturer's position is as follows:

The current hazard classification (which it is understood FSC have referred to) is based on a limited amount of data that was submitted previously for evaluation to the UK government's Pesticide Safety Directorate (PSD), notwithstanding the PSD gave its approval for use. As a coincidental but separate issue from its recent FSC classification, the manufacturer is seeking renewal of Propyzamide's PSD approval for early 2008. The manufacturer believes that the new submission contains more data to validly support a more favourable evaluation of its hazard classification.

Name	Contact	Address	Tel/email
SGS Qualifor	Douglas Orr	Douglas Orr & Co. Programme Manager on behalf of SGS Qualifor Forest Management Certification for the UK & Ireland: The Old Manse, Killearnan Tore, Muir of Ord Ross-shire IV6 7RY UK www.sgs.com/forestry	Office phone: 01463-871516 Mobile: 07775-690707 International: +44-1463-871516 douglasorr@btinternet.com
Soil Association	Janette Mckay	Soil Association Woodmark South Plaza Marlborough St Bristol BS1 3NX	0117 914 2435 jmckay@soilassociation.org

Individual SGS or Soil Association forest management client consultees should route their responses through their Certification Body contact as per above.

General consultees should send their comments to Fiona Angier of UKWAS.

Fiona Angier, UKWAS
c/o Confederation of Forest Industries (UK) Ltd
59 George Street (3rd floor)
Edinburgh, EH2 2JG

Email ukwas@confor.org.uk

Tel 0131 240 1419(UKWAS), 0131 240 1410 (ConFor); Fax 0131 240 1411

All comments from all sources will be collated and included within the application.

Information on ongoing procedure

The deadline for submission of the application to FSC international is 30th December 2007.

The derogation application comes in two parts. The first part relates to the general details of the pesticide, its usage, and any controls. The second part relates specifically to the Certification Body and the actual Certificate Holder. FSC state that derogations are not applicable UK wide but apply to each certificate holder who requires them and who can demonstrate that they use them only where no alternative is viable and are working towards alternative methods to minimise the use of these pesticides.

Any derogation granted by FSC will be for a maximum of 5 years. During this time certificate holders will be expected to move away from the need to use the product.

SGS Qualifor and SA Woodmark will be finalising the content of the applications between now and the deadline date. Anyone who wishes any clarification on procedure or further technical detail prior to completion of the formal application should contact Douglas Orr of SGS or Janette McKay of Soil Association (contact details above).

Further background information is also available from www.fsc.org

(End of consultation exercise paper – 4 pages)