

**UKWAS & FSC UK National Initiative
Public Consultation Exercise
FSC International Highly Hazardous Pesticides – Derogation applications for UK**

Start Date for Consultation – 14th May 2007

End Date for Consultation – 27th June 2007

All consultation responses to go to: Richard Robertson, FSC-UK
Preferably via email - Richard@fsc-uk.org

Position as at 14th May 2007

The UKWAS Chemicals Working Group and the FSC UK National Initiative have been preparing draft applications for UK derogations for various “highly hazardous” pesticides as defined under FSC International rules. An article which was published in early May (e.g. see Forestry & British Timber (May) or FTN (June) or www.ukwas.org.uk), written by Rob Shaw, Chairman of the UKWAS Chemicals Working Group, identified a list of pesticides that were being considered for derogation applications. Following consultation with some of the larger certificate holders, the certification bodies active in the UK and members of the Working Group there has been some revision and a proposed final list of derogation application pesticides is set out below.

Active Ingredient	Product Name	Notes
Current status: temporarily derogated until 30 th June 2007*		
Alpha-cypermethrin	Contest	Weevil control agent
Cypermethrin	Forester	Weevil control agent
Dichlobenil	Casoron G	Granular herbicide
Current status: no current derogation - new application		
Aluminium phosphide	Phostoxin	Rabbit gassing compound
Current status: current derogation expires in July 2007 - renewal application *		
Warfarin	n/a	Poison for Grey squirrels
*These derogations are expected to continue until new applications are determined.		

Consultation invited

The FSC UK National Initiative and UKWAS therefore invite your comments and consultation responses on the above proposals. As a guide the following are sources of background information and contacts who can help inform the consultation exercise.

- Derogation application forms – available from www.fsc.org
- Background on derogations – available from www.fsc.org
- Certification Bodies active in the UK:

Name	Contact	Address	Tel/email
Control Union	Paul Sandys	2 South View Sandford Crediton Devon EX17 4LP	01363 777504 psandys@controlunion.com
SGS Qualifor	Douglas Orr	SGS House Johns Lane Tividale Oldbury West Midlands B69 3HX	01463 871516 DouglasOrr@btinternet.com
Smartwood	Simon Jeffreys		01476 860788 uk@smartwood.org
Soil Association	Gus Hellier	Soil Association Woodmark South Plaza Marlborough St Bristol BS1 3NX	0117 914 2435 wm@soilassociation.org

Certification Bodies will be able to advise individual clients on how they are participating in the process, and advise on the need for individual clients to hold a derogation. Individual clients may route their responses through their Certification Body if they wish, or send comments directly.

Some key issues to which responses are required are:

- Are these pesticides 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 derogations 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?

Without a full set of responses we will be unable to make the best derogation applications.

Information on ongoing processes

During the consultation process UKWAS and the FSC UK National Initiative will be co-operating and consulting with the active UK Certification Bodies with a view to submitting a single UK set of derogation applications. The deadline for submission of the applications is 30th June 2007.

The derogation applications come 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. Those Certification Bodies who join in this process will receive, in the event of a successful application, both parts, with the second part completed as far as is possible. The Certification Body would then ensure the second part is completed by each client, and then submit the full applications to FSC International for approval on a client by client basis. Derogations are no longer 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.

The UKWAS Chemicals Working Group and FSC UK National Initiative will be finalising the content of the applications between now and the deadline date. Anyone who wishes to become involved in assisting this process, or who wishes any clarification on process and procedure should contact Rob Shaw by email on rob.shaw@scottishwoodlands.co.uk