



SUSTAINABLE FORESTRY INITIATIVE

*Good for you. Good for our forests.®*

## The Facts on Responsible Forestry – Chemical Use

There is a perception in the marketplace that FSC does not allow chemicals and bans their use. In fact, both SFI & FSC require minimization of chemical use and many FSC companies are given exemptions to use FSC's "banned" chemicals.

### FSC Standards Allow Chemical Use

FSC encourages non-chemical approaches; however its Principles and Criteria have no conditions for timed phase-out of the use of chemicals. For example, the FSC-US Forest Management Standard (v1.0)<sup>1</sup> requires that "the forest owner/manager strive to reduce the use of other chemical pesticides and biocides, and work towards their eventual phase-out whenever feasible".

- FSC's Brazil Standard states "chemical products are utilized only in clearly justified situations" and that "FSC Guidelines on compliance with pesticides use are respected".
- FSC's Russian Standard states "the enterprise shall have a strategy for the use of biological and chemical control methods of pest management" and do not call for a complete phase-out of the use of chemicals.
- FSC's Sweden Standard does not call for a complete phase-out of chemical use and notes: "If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks."

FSC has a banned list<sup>2</sup> of pesticides, however, under official FSC policy, forest managers can apply for a pesticide derogation/exemption<sup>3</sup> to use the 'highly hazardous pesticides' prohibited by the FSC Principles and Criteria. There are 74 derogation approvals worldwide for use of these pesticides on FSC-certified forests – more than half (43) specified for FSC-certified plantation management.<sup>4</sup>

FSC audits indicate that not only are pesticides being used but in some cases their use does not meet the requirements of the FSC regional standard. For example, FSC audits show the following FSC-certified forests in the United States have derogations (exemptions) for the use of pesticides that are found on their "banned" list. Some of them, such as hexazinone, are commonly used in forestry in the United States and are approved for such use by the United States Environmental Protection Agency.

- *SmartWood 2008 Annual Audit Report for FSC Lake States Uni®* (316,000 acres) states 2,267 litres of Hexazinone (Velpar) were used to treat 613 acres in 2008.
- *SCS Forest Management and Stump-to-Forest Gate Chain-of-Custody Certification Evaluation Report – Red River Forests*

*Partnership (2010)*<sup>5</sup> (a 130,000-acre forest management unit based in California) lists 14,252 pounds of Hexazinone to treat 4,641 acres; 63.25 pounds of 2,4-D to treat 361 acres; no amounts for "highly hazardous pesticides' ethylhexyl ester, Atrazine and Diflufenzuron, Dicamba, Permethrin

Despite these facts, FSC continues to allow FSC companies and FSC campaigning groups to misrepresent SFI in the marketplace claiming that FSC is chemical-free:

- Print Perfect website states: 'We recommend paper stock accredited with the Forestry Stewardship Council (FSC) Certification. The FSC seal approval is only given to ecologically and ethically sound timber producers who have to comply with a strict criteria. "Timber must not be genetically modified, be pesticide free, must not impact indigenous peoples...and must not be harvested from natural forests or habitat."<sup>7</sup>
- Dogwood Alliance: "Unlike the FSC, SFI rubber stamps some of the most destructive logging practices, attempting to hide them behind a green sheen. SFI allows for large-scale clearcutting, conversion of natural forests to plantations, unlimited use of toxic chemicals in forest management, and many other of the worst practices that leave behind a wake of degradation and destruction."<sup>8</sup>

### Bottom Line

The SFI Standard allows the use of forest chemicals that have been approved by federal, state and local governments. The SFI Standard has six auditable requirements related to minimizing chemical use, including the use of least-toxic and narrowest spectrum pesticides necessary to achieve management objectives and use of integrated pest management wherever feasible. The standard also requires that pesticides be used in accordance with label requirements with the supervision of state/provincial-trained or certified applicators and that practices are appropriate for the situation, for example: notification of adjoining landowners or nearby residents concerning applications and chemicals used, designation of streamside and other needed buffer strips, monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes and other water bodies; and use of methods to ensure protection of threatened and endangered species. (SFI 2010-2014 Standard Objective 2, Performance Measure 2.2)<sup>9</sup>

<sup>1</sup>FSC-US Forest Management Standard (v1.0): [www.fscus.org/images/documents/standards/FSC-US%20Forest%20Management%20Standard%20v1.0.pdf](http://www.fscus.org/images/documents/standards/FSC-US%20Forest%20Management%20Standard%20v1.0.pdf) (page 44)

<sup>2</sup>FSC Pesticides Policy: Guidance on Implementation [http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/guidance\\_documents/FSC\\_GUI\\_30\\_001\\_V2\\_0\\_EN\\_FSC\\_Pesticides\\_Policy\\_Guidance\\_2007\\_.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/guidance_documents/FSC_GUI_30_001_V2_0_EN_FSC_Pesticides_Policy_Guidance_2007_.pdf)

<sup>3</sup>FSC Pesticides Policy 2005 [http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/policies/FSC\\_POL\\_30\\_001\\_EN\\_FSC\\_Pesticides\\_policy\\_2005.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/policies/FSC_POL_30_001_EN_FSC_Pesticides_policy_2005.pdf)

<sup>4</sup>List of Approved Derogations [http://www.fsc.org/fileadmin/web-data/public/document\\_center/publications/Technical\\_Updates/FSC-GUI-30-001a\\_V1-0\\_EN\\_Approved\\_Pesticides\\_Derogations\\_2011-10-25x.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/publications/Technical_Updates/FSC-GUI-30-001a_V1-0_EN_Approved_Pesticides_Derogations_2011-10-25x.pdf)

<sup>5</sup>SmartWood audit for FSC Lake States Unit [www.rainforest-alliance.org/forestry/documents/potatchforestholdingspubsum08.pdf](http://www.rainforest-alliance.org/forestry/documents/potatchforestholdingspubsum08.pdf)

<sup>6</sup>For the Red River Forests Partnership certification audit see [info.fsc.org/servlet/servlet.FileDownload?retURL=%2Fapex%2FPublicCertificateDetails%3Fid%3Da0240000005sW0jAAE&file=00P40000005bWoMEAU](http://info.fsc.org/servlet/servlet.FileDownload?retURL=%2Fapex%2FPublicCertificateDetails%3Fid%3Da0240000005sW0jAAE&file=00P40000005bWoMEAU)

<sup>7</sup>Print Perfect website: [http://www.printperfect.com.au/index.php?option=com\\_content&view=article&id=90&Itemid=161](http://www.printperfect.com.au/index.php?option=com_content&view=article&id=90&Itemid=161)

<sup>8</sup>Dogwood Alliance website International Paper [www.dogwoodalliance.org/campaigns/paper-companies/ip-mov/millions-of-dollars-spent-greenwashing/](http://www.dogwoodalliance.org/campaigns/paper-companies/ip-mov/millions-of-dollars-spent-greenwashing/)

<sup>9</sup>SFI 2010-2014 Standard [www.sfiprogram.org/files/pdf/Section2\\_sfi\\_requirements\\_2010-2014.pdf](http://www.sfiprogram.org/files/pdf/Section2_sfi_requirements_2010-2014.pdf) (page 6)