



FOCUSED CONSULTATION MATERIAL

FSC-POL-30-001a Lists of FSC Highly Hazardous
Pesticides

1/08/2023



INTRODUCTION

Welcome to the focused consultation of the update of the FSC-POL-30-001a Lists of FSC Highly Hazardous Pesticides (also referred to as 'Lists of FSC HHP').

The **focused consultation is open between 1 August and 30 September 2023** and will be used to collect expert stakeholders' feedback on the draft updated Lists of FSC HHP. FSC encourages all expert-interested stakeholders to participate and provide their feedback during this period.

Please click [here](#) to submit your responses in the FSC consultation platform.

You can save current progress and edit your responses until you submit your final response. It is possible to edit your responses until the close of the consultation period. The estimated time to complete all question items (including the necessary time to read the updated Lists of FSC HHP) is 25 mins.

Thank you in advance for your participation.

Please contact Francesco Patino, process lead in this update, at forestmanagement@fsc.org for comments or questions.

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Background information

FSC requires certified Organizations to use integrated pest management (IPM) to avoid, or aim to eliminate, the use of chemical pesticides in management units (MU), and minimize risks to human health and the environment while maintaining economically viable management.

However, in certain circumstances, after having identified and determined the likely impacts of a pest, weed or disease and having considered all available pest management strategies, the use of chemical pesticides may be identified as the most suitable control. The FSC Pesticides Policy regulates the use of chemical pesticides in these situations.

The FSC Pesticides Policy is based on the following main considerations:

1. First, highly hazardous pesticides (HHPs) are identified and categorized as prohibited, highly restricted or restricted according to their hazard;
2. Second, where integrated pest management (IPM) identifies the need to use a permitted chemical pesticide as a measure of last resort, an environmental and social risk assessment (ESRA) is conducted at different levels to identify the nature and degree of risk together with the measures for mitigation, and the monitoring requirements.
3. The Policy highlights the importance of repairing and compensating for any damage to environmental values and human health and of monitoring both the use of pesticides and the impact of the Policy itself.

FSC has Lists of FSC Highly Hazardous Pesticides that are updated at least every 3 years, based on existing criteria, indicators and thresholds to reflect potential changes made to the classification of the active ingredients in the international databases listed in Annex 1 of [<FSC-POL-30-001 FSC Pesticides Policy>](#).

The update of the Lists of FSC HHP is being conducted between May 2023 and January 2024 through an accelerated revision process as described in [<FSC-PRO-01-001 The Development and Revision of FSC Requirements>](#).

For this exercise, FSC has established an internal working group supported by 2 independent technical experts. Learn more about this revision process on the [dedicated process page](#) on FSC Connect.

The consultation material for this focused consultation is:

- Draft [<FSC-POL-30-001a Lists of FSC Highly Hazardous Pesticides>](#) (updated draft version of the addendum).
- Supporting material: Changes in Draft 1-0.

The focused consultation is open between 1 August and 30 September 2023.

After the consultation period, FSC and expert consultants will revise the draft based on the collected feedback. The final version of the draft of the updated Lists of FSC HHP is expected to be delivered and submitted for approval in November 2023.

The publication of the updated Lists of FSC HHP is expected in January 2024.

METHODOLOGY FOLLOWED TO DEVELOP DRAFT 1-0

Every single active ingredient listed under the three FSC lists (Prohibited, Highly Restricted and Restricted) has been checked for all the identified hazard criteria, indicators and thresholds listed in Annex 1 of the FSC Pesticides Policy and summarized below:

Hazard group	Number	Criterion
Relevant International Agreements or Conventions	1.1.a	Stockholm (POP)
	1.1.b	Rotterdam (PIC)
	1.1.c	Montreal
Acute toxicity	2.1.a	Extremely or highly hazardous (Ia and Ib)(WHO)
	2.1.b	Acute toxicity mammals and birds LD50< 200mg/kg body weight
	2.1.c	Fatal if inhaled (H330) (GHS)
Chronic toxicity	3.1.a	Carcinogen and probable carc. (1 and 2A) (IARC)
	3.1.b	Carcinogen and probable carc (US EPA)
	3.1.c	Carcinogen and probable carc. (1A &1B) (EU GHS)
	4.1.a	Mutagen and probable mut. (1A and 1B) (EU GHS)
	5.1.a	Reproductive toxicant and probable repr. tox. (1A and 1B) (EU GHS)
	6.1.a	Category 1 (EDC EU)
	6.1.b	Suspected carcinogen (Cat. 2)(GHS) and Reproductive Toxicity (Cat. 2) (GHS)
Environmental toxicity	7	Aquatic Toxicity (LC/EC 50 <50 µg/l)
	8	Environmental toxicity (Persistent; Bioaccumulation; Leaching)
Dioxins	9	Dioxins (residues or emissions)
Heavy metals	10	Heavy Metal

The sources used to verify the current classification of the active ingredients are those listed in Annex 1 of the FSC Pesticides Policy. They are also listed below:

1. [Stockholm Convention](#)
2. [Rotterdam Convention](#)
3. [Montreal Protocol](#)

4. WHO Classification
5. The Footprint Pesticide Properties Database (PPDB)
6. The Pesticide Manual British Crop Protection Council (BCPC) (new subscription – not available for free)
7. GHS Regulation 1272/2008/EC
8. US EPA Lists of Carcinogenic Pesticides
9. IARC: Agents reviews by the IARC Monographs. Volumes 1-102 International Agency for Research on Cancer (IARC), Lyon, France
10. EDC 1 (Sources 2000-2007)

The new classification has been compared to the classification reported in the Lists of FSC HHP and all the changes have been reported in Draft 1-0. When such changes led to moving or deleting an active ingredient, this has been done accordingly, as reported in Supporting material: Changes in Draft 1-0.

CHANGES IN DRAFT 1-0

As a result of the update of the Lists of FSC HHP, 41 changes were identified.

These changes include:

- a) 8 key changes made to the List of FSC Prohibited HHP.
 - 2 pesticide active ingredients were brought from the List of FSC Highly restricted HHP.
 - 1 pesticide active ingredient was brought from the List of FSC Restricted HHP.
 - 5 pesticide active ingredients remain on the List of FSC Prohibited HHP (had updates in their criteria).

- b) 11 key changes made to the List of FSC Highly restricted HHP.
 - 2 new pesticide active ingredients.
 - 3 pesticide active ingredient were brought from the List of FSC Restricted HHP.
 - 6 pesticide active ingredients remain on the List of FSC Highly restricted HHP (had updates in their criteria).

- c) 17 key changes made to the List of FSC Restricted HHP.
 - 2 new pesticide active ingredients.
 - 1 pesticide active ingredient was brought from the List of FSC Prohibited HHP.
 - 1 pesticide active ingredient was brought from the List of FSC Highly restricted HHP.
 - 13 pesticide active ingredients remain on the List of FSC Restricted HHP (had updates in their criteria).

- d) 5 deleted pesticide active ingredients from the Lists of FSC HHP.
 - all from the List of FSC Restricted HHP.

You will find more detailed information on the changes (e.g., CAS number, reason, source of information) in the file 'Supporting material: Changes in Draft 1-0'.

BACKGROUND AND INTERESTS

Please help us understand more about your background and interests by filling in the questions below:

1. Please select your region:

- Africa
- Asia Pacific
- Europe
- Latin America
- North America

2. Please select the option that best identify yourself regarding your background and interests:

- Academia / research organization
- Assurance Services international (ASI)
- Certificate Holder
- Certification body
- FSC Network Partner
- FSC International
- Governmental organization
- ISEAL member
- Non-Governmental Organization (NGO)
- Other (please specify)

3. If you are an FSC member, please specify your chamber:

- Economic South
- Economic North
- Environmental South
- Environmental North
- Social South
- Social North

4. Please add your email address if you give your consent to be contacted by the process lead.

Bear in mind information and comments received will be addressed in compliance with data protection requirements.

QUESTIONS

Question 1. To what extent do you agree that this draft version of the updated Lists of FSC HHP accurately reflects the classification of pesticides that meet the criteria, indicators and thresholds presented in FSC-POL-30-001 FSC Pesticides Policy according to the sources listed in Annex 1 of the Policy?

- 100% agree
- 75% agree
- 50% agree
- 25% agree
- 0% agree

Question 2. Please briefly explain your rationale and/or include suggestions for improvement.

Question 3. Do you identify further changes to be included to the List of FSC Prohibited HHP, according to the criteria, indicators, thresholds, and official sources of information presented in the FSC Pesticides Policy? Please briefly explain your rationale.

Question 4. Do you identify further changes to be included to the List of FSC Highly Restricted HHP, according to the criteria, indicators, thresholds, and official sources of information presented in the FSC Pesticides Policy? Please briefly explain your rationale.

Question 5. Do you identify further changes to be included to the List of FSC Restricted HHP, according to the criteria, indicators, thresholds, and official sources of information presented in the FSC Pesticides Policy? Please briefly explain your rationale.

Question 6. Do you identify any risks or opportunities related to the proposed changes presented in the draft version? Please briefly explain your rationale and refer to specific pesticide active ingredients.

THANK YOU VERY MUCH FOR YOUR PARTICIPATION

FSC thanks you very much for providing your feedback in this consultation!

As a reminder, it is possible to change your responses while the consultation is open until 30 September 2023. Even if you have submitted your response, you can return and edit it.

For further information on this revision process, please visit our [current processes site](#) on the FSC website.



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