

FSC Highly Hazardous Pesticide Derogation 2016 Public Comment Template

Closing date for comments – 24 January 2016

Please provide your details (optional)

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Please select which FSC Highly Hazardous Pesticide Derogation(s) you are commenting on:

Pesticide	
1080	<input checked="" type="checkbox"/>
Amitrole	<input checked="" type="checkbox"/>
Alpha cypermethrin	<input checked="" type="checkbox"/>
Fipronyl	<input type="checkbox"/>

Please select the forest company(s) you are interested in providing comment to:

Forest Company	
Albany Plantations Fibre Limited (WA)	<input checked="" type="checkbox"/>
Hancock Queensland Plantations – HQP (QLD)	<input type="checkbox"/>
PF Olsen (Aus) Pty Ltd (VIC, SA, WA, QLD)	<input checked="" type="checkbox"/>
Australian Bluegums Ltd (VIC, SA, WA)	<input checked="" type="checkbox"/>
Forestry Tasmania	<input type="checkbox"/>
Hancock Victoria Plantations - HVP (VIC, SA)	<input type="checkbox"/>
WAPRES(WA)	<input checked="" type="checkbox"/>
Bunbury Fibre (WA)	<input checked="" type="checkbox"/>
Forico (TAS)	<input type="checkbox"/>
SFM (TAS, VIC, SA)	<input type="checkbox"/>

Please note that this public comment is for comment on the FSC Highly Hazardous Pesticide Derogation renewal applications only. Comments regarding non- FSC Highly Hazardous chemicals or broader forest operations are not able to be duly considered in this consultation process and stakeholders should direct these comments to FSC International.

**Comments received after 24 January 2016 may not be considered in the
derogation application process.**

When your comments are completed please return your comments to your preferred forest company representative (see table below), or to the National Coordinator Kevin O'Grady at [kopinnacle@gmail.com](mailto:kopinacle@gmail.com) or PO Box 41 Eltham Victoria 3095.

The Forest industries Federation WA (FIFWA) is the industry association representing the forest products industry in Western Australia. FIFWA supports responsible forest management and is the custodian of the Code of Practice for Timber Plantations in Western Australia. From this perspective FIFWA welcomes the opportunity to provide comment of the on the FSC Highly Hazardous Pesticide Derogation renewal applications for 1080, Amitrole and Alpha-cypermethrin.

FIFWA recognises that 1080, Amitrole and Alpha cypermethrin are chemicals which have been used by plantation managers in Western Australia for many years, they are all registered chemicals with the APVMA for use compatible with that stipulated in the derogations. FIFWA is unaware of any adverse impacts caused to employees, the general public or the environment through the use of these registered chemicals in plantations when prepared, handled and used in accordance with the label.

1080.

FIFWA recognises the legal responsibility of plantation managers to control declared pest animals on their properties, regardless of whether the pest is a threat the plantation itself such as foxes and cats. 1080 is widely used in Western Australia to control predatory pests as 1080 is a naturally occurring substance in Western Australia and many native species have a level of natural resistance to 1080 poisoning, making it a preferred control to other chemicals which would likely have a greater impact on native species.

Accepting the greatest risk of non-target species poisoning is to domestic animals FIFWA notes the applicants have committed to reducing this risk by implementing a range of measures in accordance with the Code of Practice for Timber Plantations in Western Australia such as undertaking neighbour engagement and by adopting a range of additional measures such as erecting signage, and using 1080 in conjunction with other control measures such as shooting, trapping and fencing where appropriate.

Pest management fulfils a legal and social responsibility. FIFWA raises no specific concerns with the derogation sought for the use of 1080 in Western Australian plantations.

Amitrole

FIFWA notes forest managers seeking to use Amitrole have committed to a range of controls above and beyond the regulatory controls as outlines the Code of Practice for Timber Plantations in Western Australia including; providing additional personal protective equipment to prevent inhalation such as respirators and/or cab-air filters. With respect to the environment FIFWA acknowledges the controls stipulated to reduce spray drift, buffers from waterways and other

sensitive environments. Long term water monitoring results demonstrate the effectiveness of the approach, concluding no differences detected between aquatic fauna in 'impacted' and 'control' streams.

Given amitrole is unique pesticide in that it covers both grass and broadleaf pest species without damage to eucalyptus crop trees and is both commercially viable and more effective than any other known alternative, FIFWA raises no objections to the use of amitrole when used in accordance with the label and in conjunction with the nominated controls.

Alpha-cypermethrin.

FIFWA acknowledges the undeniable need to control leaf defoliating insects as they have the potential to completely annihilate plantations. Alpha-cypermethrin an effective pesticide to control leaf defoliating insects and is widely used by the agricultural industry.

FIFWA notes forest managers intend to limit the use of Alpha-cypermethrin to ground applications where trees are less than 10 meters tall. However applicants claim aerial spraying is more effective in taller plantations and preferable to upward blowing. This being said FIFWA notes forest managers are largely using alternative pesticides for the control of insects except for outbreaks of swarming insects exceeding pest thresholds.

The Code of Practice for Timber Plantations in Western Australia provides guidelines to plantation managers undertaking aerial spraying, FIFWA notes the derogation meets these guidelines.

Recognising the potential impact to non- target species (in particular bees), FIFWA notes the applicants have committed to reducing this risk by implementing a range of measures such as spraying in the early morning when bees are not foraging and consulting with known apiarists in the affected area.

Given the adherence to the stipulated control measures and giving consideration to the need to control leaf defoliating insects to ensure the survival of plantations FIFWA raises no concern with the derogation sought for the use of Alpha-cypermethrin in Western Australian plantations.