

Guidance Note:

FSC® Environmental and Social Risk Assessment For the Use of Chlorantraniliprole (CTPR)

Purpose and Scope

The FSC policy regulates the use of chemical pesticides in certified forests. It promotes **Integrated Pest Management (IPM)** to avoid or minimise pesticide use while ensuring environmental, social, and economic sustainability. This applies to certified forests but excludes third-party nurseries.

Forest Managers must conduct a **comparative ESRA** to:

- Identify the **lowest-risk option** for pest, weed, or disease control.
- Define conditions for pesticide use.
- Establish mitigation and monitoring measures.

ESRAs must inform **operational planning**. Stakeholder engagement and transparency are required; assessments must be made available upon request. This ESRA covers standard forestry uses of weevil control post planting.

Indicator from UK ESRA	Primary Control Measure	Supervision and Management
CTPR.1 Operations conform to FISA Safety Guide 202 Application of pesticides by hand-held equipment.	• Use of only trained and competent operators.	• Site inspections • Corrective actions raised, as necessary. • Toolbox talks issued where relevant.
CTPR.2 Operators hold NPTC PA1 and PA6 certificates of competence or LANTRA equivalents.	• Only operators with suitable qualifications can be assigned to do pesticide application.	• Site inspections • Corrective actions raised, as necessary. • Toolbox talks issued where relevant.
CTPR.3 There is an appropriate COSHH assessment.	• Refer to Certificate Holders' CoSHH Assessments for mixing and application.	• CoSHH Assessments are included in the Operators Site Documentation.
CTPR.4 Operators comply with the requirements and relevant recommendations of the product Emergency Approval	• The Extension of Use approval is included with the Operative's Site Documentation. • Use of only trained and competent operators.	• Site inspections • Corrective actions raised, as necessary. • Toolbox talks issued where relevant.
CTPR.5 Records of CTPR usage are maintained, including trade name, active ingredient, quantity of active ingredient used, period of use, number and frequency of applications, location and area of use, and reason for use. These records are kept for a minimum of five years.	• Pesticide Application Record completed and returned by the operator for every application. • Data from forms retained by the certificate holder.	• Records checked by forest manager and during internal audits.

CTPR.6 There is awareness of research into chemical and non-chemical alternatives to CTPR carried out by Forest Research, the Hylobius Industry Research Programme, or other agencies.	Not directly related to on site activity. Certification Manager holds the responsibility for disseminating information. (also see CTPR 7)	
CTPR.7 Individual certificate holders or group schemes with a total certified area of more than 5,000 hectares provide financial or in kind contributions to research into chemical and non-chemical alternatives to acetamiprid carried out by Forest Research, the Hylobius Industry Research Programme or other agencies.	Group Scheme Manager holds the responsibility for disseminating information.	- Membership of Group Scheme. - Tilhill are members of HIRP, the industry body working to support research into the management of Hylobius, where one of the aims is the development alternatives to chemicals in areas of high Hylobius population. - We continue to commit to this research and currently involved in the scoping of the subgroup for hylobius control
CTPR.8 Operations conform to UK Forestry Standard requirements and guidelines in relation to buffer zones around watercourses, waterbodies, and abstraction points. There is no usage, mixing or filling of acetamiprid within 10 m of permanent watercourses with a channel <2 m wide, within 20 m of wider watercourses or lakes, reservoirs, large ponds or wetlands, or within 50 m of abstraction points for public or private water supplies, such as springs, boreholes, wells or surface water intakes	- Sites are inspected prior to operations to identify any issues including drains directly connected to watercourses. - Appropriate measures included in the instructions given to the operator. - Water supplies are identified on site maps and the buffer zone around them marked on the ground. - Use of only trained and competent operators to identify other buffers.	- Site inspections - Corrective actions raised, as necessary. - Toolbox talks issued where relevant.
CTPR.9 Impacts on water quality are monitored using data collected by drinking water inspectorates and/or statutory environment protection agencies.	This is done at a UK level	Research carried out by Forest Research shows that CTPR does not contaminate watercourses if the controls in this document are full implemented.

CTPR.10 Applications are targeted to avoid run-off into the soil or contact with non-target plants.	• Applications are targeted to avoid run-off into the soil or contact with non-target plants • Use only trained and competent operators.	• Site inspections with corrective actions raised, as necessary. • Toolbox talks issued as necessary • Managers to follow Tilhill CTPR guidance note. As per Forest Research note Interim guidance on the integrated management of <i>Hylobius abietis</i> in UK forestry, which recommends that 'The spray should be carefully directed to cover the entire circumference of [the] lower half of the stem, allowing the solution to flow down the stem and onto the root collar. In addition the foliage should be treated, as this allows the systemic insecticide to be absorbed and then translocated around the plant. Run-off into the soil, or drift to surrounding soil or vegetation, should be minimised through the use of low spraying pressures (around 1 bar) and suitable nozzles, such as an adjustable cone nozzle.' Apply as per product label, Forester should be applied as 10-20ml diluted spray per tree at a 2% solution ie 20 ml product per 1 litre water
CTPR.10a Non-target species	While with any insecticide there are theoretical potential impacts on bees if they were to ingest it CTPR application is to non-flowering plants, this minimises the risk of exposure of bees to the chemical.	• Local beekeepers shall be consulted ahead of commencement of spraying operations
CTPR.11 There is appropriate consultation with the relevant statutory nature conservation body and/or other experts to identify and mitigate potential threats to statutory designated sites within and/or adjacent to the management unit.	• Only applicable to designated sites. • Consents obtained where required.	• Site management Forest Plans and maps identify all designated sites. • Scoping procedure ensures contact with local agencies.
CTPR.12 Operators have and use adequate personal protective equipment as specified on the product label and in the COSHH assessment.	• Use only trained and competent operators. • CoSHH Assessment provided to lead operator.	• Site inspections with corrective actions raised, as necessary. • Toolbox talks issued as necessary

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CTPR.13 Operator exposure to CTPR is monitored using pesticide application records and site checks of use of personal protective equipment. There is appropriate follow up action if personal protective equipment is not being used.	• CoSHH Assessment for required PPE. • Pesticide Application Record confirms use. • Use of only trained and competent operators.	• Site inspections with corrective actions raised, as necessary. • Toolbox talks issued as necessary.
CTPR.14 Operator health concerns are monitored using pesticide application records and site checks. There is appropriate follow up action if health concerns are identified.	• Pesticide Application Record contains section for reporting ill effects. • Ill effects raised soon as reported and followed up by internal investigation.	• Ill effects reported to Forest Manager & recorded
CTPR.15 CTPR containers are stored safely and securely.	• All operators required to use suitable storage boxes on site.	• Use of only trained and competent operators. • Site inspection with corrective actions raised, as necessary. • Toolbox talks issued as necessary

Indicator from UK ESRA	Primary Control Measure	Supervision and Management
CTPR.16 Operations conform to Forestry Commission Practice Guide 15 guidance on protecting the public	• Sites are inspected prior to operations to identify any access issues and appropriate measures included in the instructions given to the operator. • Consultation with local authority and local people is carried out if appropriate. • Site maps marked up where appropriate	• Use of only trained and competent operators. Site inspections with corrective actions raised, as necessary. • Toolbox talks issued as necessary
CTPR.17 Where it is desirable to restrict public access to minimise health and safety risks, such restrictions are kept to the minimum extent and duration necessary to achieve their aims.	• Site maps and contract instructions. • Signs are put in place as required and access routes diverted or closed as appropriate and as identified in Ace 16 and removed 24hrs after completion. • Use of only trained and competent operators.	• Site inspections with corrective actions raised, as necessary. • Toolbox talks issued as necessary

Operational Checklist from ESRA Controls

1. Pre-commencement	Comments
Site Name/location:	
Date:	
People	
All operators are suitably qualified	
Copies of all certificates of competence are held on file	
CoSHH and PPE	
CoSHH assessment identifies appropriate PPE	
CoSHH assessment given to main operator and PPE agreed	
Pesticide Approvals	
"Off-label" approval checked and provided to operator	
Application rate agreed and operator provided with Gazelle SG mixing and calibration document	
Buffer Zones	
Site walked and watercourses marked on site map	
Drains checked and either: - disconnected from watercourses by silt trap and suitable buffer. - or connected drains marked on site map and to be buffered as per watercourses	
Sensitive buffers (e.g., Water supplies) marked on site map and physically on the ground with flag or tape	
Equipment	
Operator has appropriate nozzles pesticide to target tree	
Operator has suitable pesticide storage box	
Records	
Operator understands reporting requirements and has appropriate form to complete	
Public Access	
Access routes identified on site map	
Signs in place to warn members of public or divert access route	
Access routes buffered if required.	
Designated Sites	
Appropriate agency consulted	
Approval obtained if required	
Sensitive areas marked on site map and physically on the ground with flag or tape	
Site Map	
Site map checked and copy given to operator	
2. Completion Record	
Records	
Pesticide Application Record returned by Operator	
Pesticide Application record checked and filed	
Ill effects (if any) recorded and followed up	
Public Access	
Signs removed 24hrs after job concluded	
Waste Management	
All waste removed from site and disposed of correctly	

3. Supervision and Management

Date	Observations	Actions Taken

4. Guidance Note

Before the ESRA is contemplated the decision to use a pesticide must be justified through an Integrated Pest Management approach.

The UK level ESRA contains a set of requirements designed to control the risk of contamination of operators, the environment, and members of the public. These controls represent best practice in the use of pesticides. At a local level, the forest manager is required to show how these controls have been implemented in practice and how any site-specific issues have been deal with. It is therefore possible to create a checklist of items that must be in place before an operation begins. When an operation is completed there are requirements of record keeping.

To comply with the requirements of the ESRA it is also necessary to show, through supervision and management of the operation, that it was carried out correctly. The level of supervision and management should be related to the scale, intensity and risk posed. This would be determined by such issues as the presence of water supplies, public footpaths etc as well as the overall area to be treated.

A completed copy of the attached template should be retained for each pesticide application along with the additional documentation it refers to.