

**Environmental and Social Risk Assessments for Chemical Pesticides  
Used in the Eastern Ontario Forest Group on FSC® Certified Lands**

**Contents**

List of pesticides used in EOMF FM Group.....2  
Environmental and Social Risk Assessment (ESRA) for Aminopyralid and Metsulfuron-methyl ....4  
Environmental and Social Risk Assessment (ESRA) for Azadirachtin.....11  
Dichlorprop Environmental and Social Risk Assessment (ESRA) .....19  
National-level Glyphosate Environmental and Social Risk Assessment (ESRA) .....26  
Imazapyr Environmental and Social Risk Assessment (ESRA) .....35  
National-level Triclopyr Environmental and Social Risk Assessment (ESRA) .....43

**List of pesticides used in EOMF FM Group**

Number	FSC Hazardous Pesticide Category	Active Ingredient	Tradename(s)	Registration (Pest Control products Act #)	Pesticide Group	Company	Rationale for Use	Notes
1	Restricted	Glyphosate and its salts	Roundup WeatherMax, Roundup Transorb, Roundup XRT, VisionMax, VP480	27487	9	Bayer Canada	Tending and site preparation, (difficult to regenerate species, e.g. Pw, Oak), Control of invasive and noxious species (Dog strangling vine, garlic mustard, buckthorn, poison ivy)	Currently used within Group
2	Triclopyr is <b>not</b> considered a highly hazardous pesticide (HHP) per the FSC Pesticide Policy (FSC-POL-30-001 V3-0 EN) and the FSC Lists of HHP (FSC-POL_30_00a EN)	Triclopyr	Garlon RTU	29334	4	Corteva Agriscience Dow AgroSciences Canada Inc.	Tending of difficult to regenerate species (Pw, oak) Control of invasive and noxious species	Currently used within Group
3	Aminopyralid and Metsulfuron-mythel (same as above)	Aminopyralid and Metsulfuron-mythel	ClearView	29752	2 & 4	Corteva Agriscience Dow AgroSciences Canada Inc.	Tending for control of broadleaf species, including invasive and noxious species (e.g. wild parsnip) Selective herbicide for post-emergent control of annual and perennial broadleaf weeds, invasive plants and shrubs.	Currently used within Group
4	Azadirachtin (same as above)	Azadirachtin	TreeAzin	30559	4	BioForest	Azadirachtin is a systemic insecticide used to manage specific insect pests of trees in forest, woodlot, urban, and residential landscapes. Azadirachtin is a <b>botanical</b> insecticide	Currently used within Group

							derived from the neem tree.	
5	Restricted	2,4-D+ Dichlorprop-P	Dichlorprop-DX Etaprop XT Etaprop +		4	Dichlorprop-DX = IPCO  Etaprop = Nufarm Agricultural Inc.	Control of difficult-to-kill, noxious weeds including invasive species such as Dog-strangling Vine and Spotted Knapweed that heavily degrade forest ecosystems. Effective control of deep-rooted species.	Currently used within Group
6	Imazapyr (not an HHP)	Imazapyr	Habitat Aqua	32374	2	BASF	Control of invasive species in non-cropland areas, including where contact with surface water is a risk	Currently used within the group

**Environmental and Social Risk Assessment (ESRA) for Aminopyralid and Metsulfuron-methyl**

This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Aminopyralid and Metsulfuron-methyl is not considered a highly hazardous pesticide (HHP) per the FSC Pesticide Policy (FSC-POL-30-001 V3-0 EN) and the FSC Lists of HHP (FSC-POL_30_00a EN)		
<b>Chemical pesticide</b>	Aminopyralid and Metsulfuron-methyl	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Silviculture herbicide for the control of competing or non-desirable broadleaf vegetation, including invasive and noxious species. This product is applied for site preparation and tending operations.

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of Aminopyralid and Metsulfuron-methyl on the FMU.

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
May cause moderate eye irritation. May cause slight corneal injury. Brief contact may cause skin irritation with local redness. Prolonged skin contact is unlikely to result in absorption of harmful amounts. Very low toxicity if swallowed. (1).	Prolonged excessive exposure to dust may cause adverse effects. Based on the available data, respiratory irritation was not observed (1).	For the active ingredient(s): Did not cause cancer in laboratory animals. A risk assessment has been conducted for this product and has shown, that under normal handling, the minor components will not pose a hazard (1).	In vitro genetic toxicity studies were negative. Animal genetic toxicity studies were negative (1).	Did not cause birth defects or any other fetal effects in laboratory animals. In animal studies, did not interfere with reproduction. (1).	Specific Target Organ Systemic Toxicity (Single Exposure) Evaluation of available data suggests that this material is not an STOST-SE toxicant. However, STOST (Repeated Exposure) effects in animals have been reported on the Gastrointestinal tract (1).

Table 1b.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
Yes. Toxic to aquatic organisms on an acute basis (LC50/EC50 <0.1 mg/L in the most sensitive species). Mitigation measures (spray buffer zones) are required on product labels to protect aquatic organisms (1, 2).	The PMRA assessed the potential leaching of aminopyralid to groundwater and the potential drinking water risk from exposure to aminopyralid through ground water. Review indicated that pest control products containing aminopyralid do not pose unacceptable risks to human health or the environment when used according to the label (3). Metsulfuron-methyl Biodegradability: No appreciable biodegradation is expected (1).	Does not bio-accumulate in the environment (4).

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
Environmental	Soil (Erosion, Degradation, Biota, Carbon Storage)	<b>Minimal indication of adverse effects to Soil when chemical is used according to label instructions. Additional considerations are provided, below.</b>  It does not bio-accumulate in the environment (4). No appreciable biodegradation is expected (1).

<p><b>Water</b> (ground water, surface waters, water supplies)</p>	<p><b>Minimal indication of adverse effects to water when chemical is used according to label instructions. Additional considerations are provided, below.</b></p> <p>The PMRA assessed the potential leaching of aminopyralid to groundwater, and the potential drinking water risk from exposure to aminopyralid through groundwater. The review of aminopyralid indicated that pest control products containing aminopyralid do not pose unacceptable risks to human health or the environment when used according to label instructions (3). However, the use of this chemical may result in contamination of groundwater particularly in areas where soils are permeable (e.g. sandy soil) and/or the depth to the water table is shallow (2).</p>
<p><b>Atmosphere</b> (air quality, greenhouse gasses)</p>	<p><b>Minimal indication of adverse effects to atmosphere when chemical is used according to label instructions. Additional considerations are provided, below.</b></p> <p>Toxic fumes may be released in fire situations. Thermally stable at typical use temperatures (1).</p>
<p><b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)</p>	<p><b>Negative impacts on non-target species exist for some plants and wildlife.</b></p> <p>Injury to or loss of desirable plants may result unless the following of all label instructions (2). Material is practically non-toxic to birds on an acute basis (LD50 &gt; 2000 mg/kg) but is toxic to aquatic plants on an acute basis (LC50/EC50 &lt;0.1 mg/L in the most sensitive species) (1). Low acute and chronic toxicity to mammals, fish, aquatic invertebrates, honeybees, and earthworms (4).</p>
<p><b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)</p>	<p><b>Minimal indication of adverse effects to non-timber forest products when chemical is used according to label instructions. Additional considerations are provided below.</b></p> <p>Secondary effects to habitats and food availability could occur, which would affect non-target organisms. These secondary effects caused by herbicide could either be detrimental or beneficial to affected species (4).</p>
<p><b>High Conservation Values</b> (particularly HCV 1-4)</p>	<p><b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies. Additional considerations are provided below.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV</p>

		Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (6).
	<b>Landscape</b> (aesthetics, cumulative impacts)	<b>Minimal indication of adverse effects to Landscape values was found when used according to label instructions in forestry applications. Additional considerations are provided below.</b>  Unintentional habitat/ landscape effects are possible, but unlikely. The application of triclopyr will be evident during the first few year's post-application (4).
	<b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)	<b>Minimal indication of adverse effects to ecosystem services was found when used according to label instructions in forestry applications. Additional considerations are provided below.</b>  The herbicide can pose a risk to water features if the product label, buffer zones and local/provincial regulations are not followed. It can also pose a risk to water features by contamination from spills, run-off, or improper equipment washing/rinsing techniques. Forestry applications could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time (1, 2, 4).

Table 3. A Description of potential risks pertaining to each Social Value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies.</b>  Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess the status of HCVs 5 and 6 within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs (6).
	<b>Health</b> (fertility, reproductive health, respiratory health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)	<b>Minimal indication of adverse effects to human health was found when herbicide is used according to label instructions in forestry applications. Additional information is provided in Table 1b above.</b>

<p><b>Welfare</b></p>	<p><b>Minimal indication of adverse effects to Welfare was found when used according to label instructions in forestry applications.</b></p> <p>Herbicide application for silviculture purposes are intended mainly for vegetation not consumed by people (2,4). Required public notification, signage and treatment area monitoring minimize the risk of food gathering taking place in treated areas.</p>
<p><b>Food and Water</b></p>	<p><b>Minimal indication of adverse effects to food and water was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b></p> <p>Food: see Welfare directly above</p> <p>Water: The PMRA found that the potential for leaching to ground water and drinking water do not pose an unacceptable risk when used according to the conditions of registration (3).The herbicide can pose a risk to water features if the product label, buffer zones and local/provincial regulations are not followed. It can also pose a risk to water features by contamination from spills, run-off, or improper equipment washing/rinsing techniques. (2).</p>
<p><b>Social Infrastructure</b> (schools and hospitals, recreational infrastructure, infrastructure adjacent to the FMU)</p>	<p><b>Minimal indication of adverse effects to Social Infrastructure was found when herbicide is used according to label instructions in forestry applications (1).</b></p>
<p><b>Economic Viability</b> (agriculture, livestock, tourism)</p>	<p><b>Minimal indication of adverse effects to economic viability was found when herbicide is used according to label instructions in forestry applications. Additional considerations are provided below:</b></p> <p>When applied for forest management purposes the risk to sensitive agricultural crops or range lands is minimal. Forestry applications could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time (1,4).</p> <p>Risks to non-target plant species due to drift, with highest risk due to aerial application and lowest from backpack application.</p>
<p><b>Rights</b> (legal and customary)</p>	<p><b>Minimal indication of adverse effects to Rights, except when access is restricted, was found when used according to label instructions in forestry applications.</b></p> <p>The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) the protection of legal and customary rights are considered in Principle 1 in regards to tenure rights, in Principle 2 in regards to workers’ rights, in Principle 3 in</p>



		regards to Indigenous rights, and in Principle 4 in regards to the rights of local communities. With adherence to all applicable laws and the NFSS, there is no risk to human rights (6).
	<b>Others</b>	<b>No additional values were identified in this assessment.</b>
<b>Organization references regarding local conditions and regulatory requirements:</b>		

Table 4. Strategies defined to minimize Environmental and Social Risks associated with Application.

<b>Exposure Elements</b>	<b>Mitigation Strategies</b>
<b>Environmental and Social Exposure Elements</b>	<b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2, 3, 4).</b>
<ul style="list-style-type: none"> <li>• Soil</li> </ul>	
<ul style="list-style-type: none"> <li>• Water</li> </ul>	General consideration of exposure variables designed to mitigate risk: -Know and understand the specific pesticide formulation and/or tank mixture, as its unique formulation may provide a different risk characterization. -Understand how the mixture of active ingredients affects the pesticides risk profile. -Seek to minimize the frequency, interval, and amount of application.
<ul style="list-style-type: none"> <li>• Atmosphere</li> </ul>	
<ul style="list-style-type: none"> <li>• Non-Target Species</li> </ul>	Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. -Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. -Have appropriate, waste management systems in place.
<ul style="list-style-type: none"> <li>• Non-Timber Forest Products</li> </ul>	
<ul style="list-style-type: none"> <li>• High Conservation Values (1-4)</li> </ul>	Mitigating Risk to the Environment: reduce contact with water resources and minimize application amounts and number of applications. Apply buffer zones as per Product Label.
<ul style="list-style-type: none"> <li>• Landscape</li> </ul>	
<ul style="list-style-type: none"> <li>• Ecosystem Services</li> </ul>	General and non-target species: -Minimize risk of spray drift: unintentional spray drift has potential to significantly increase risk to the environment and public welfare. Follow product-specific guidelines for reducing spray drift for specific application scenarios. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result. Reduce volatilization potential by minimizing spray contact with non-permeable surfaces (roads, rocks), especially during higher air temperatures.
<ul style="list-style-type: none"> <li>• High Conservation Values (5-6)</li> </ul>	
<ul style="list-style-type: none"> <li>• Health</li> </ul>	Water: This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high-water mark. Do not contaminate water when cleaning equipment or disposing of equipment used water. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, or other waters.
<ul style="list-style-type: none"> <li>• Welfare</li> </ul>	
<ul style="list-style-type: none"> <li>• Food and Water</li> </ul>	
<ul style="list-style-type: none"> <li>• Social Infrastructure</li> </ul>	Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. Do not apply to open water. Do not apply to saltwater bays or estuaries. Do not apply on ditches that are used to transport irrigation water.
<ul style="list-style-type: none"> <li>• Economic Viability</li> </ul>	

<ul style="list-style-type: none"> <li>• Rights</li> <li>• Others</li> </ul>	<p>Mitigating Risk to Workers: When applying pesticides label instructions should be followed. Applicators and other handlers must wear personal protective equipment (PPE), as per Label and Safety Data Sheet: • Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. • Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. • Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. • Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse these items. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry • Application crews should not walk through treated vegetation, as foliar application occurs up to shoulder high brush.</p> <p>Mitigating Risk to Public Access/Public Welfare: Reduce the possibility of public consumption of contaminated wild food (e.g., fruit or fungi) and public exposure to pesticides through public outreach and engagement, limiting access, and/or appropriate signage. For instance, users of the forest may be excluded from the area using barriers or signage until the pesticide dries. Consider effects on local communities and indigenous peoples when considering limiting access to treatment areas. Restrict access to application area as per any Product Label requirements.</p>
<p><b>Organization references regarding local conditions and regulatory requirements:</b></p>	

References:

1. Corteva AgroSciences, Pesticide Product SDS, 2017 (Clearview Herbicide). <https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/sds/DF-ClearView-Herbicide-SDS-English.pdf>
2. Corteva AgroSciences, Pesticide Product Label, 2017 (Clearview Herbicide). <https://www.corteva.ca/en/products-and-solutions/crop-protection/clearview.html>
3. Re-evaluation Note REV2014-04, Special Review Decision: Aminopyralid, Health Canada. Pest Management Regulatory Agency (PMRA). 2014. <https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/decisions-updates/reevaluation-note/2014/aminopyralid-rev2014-04.html>
4. Facts on Clearview, Dow Agro Sciences. 2014. <http://www.lanarkcounty.ca/Assets/Public+Works/May+4+7-Clearview+Fact+Sheet.pdf>

**Environmental and Social Risk Assessment (ESRA) for Azadirachtin**

This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Azadirachtin is not considered a highly hazardous pesticide (HHP) per the FSC Pesticide Policy (FSC-POL-30-001 V3-0 EN) and the FSC Lists of HHP (FSC-POL_30_00a EN)		
<b>Chemical pesticide</b>	Azadirachtin	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Azadirachtin is a systemic insecticide used to manage specific insect pests of trees in forest, woodlot, urban, and residential landscapes. Azadirachtin is a botanical insecticide derived from the neem tree.

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of Azadirachtin.

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
May be harmful if swallowed. No adverse effects with normal skin. Causes eye irritation (1).	Causes respiratory tract irritation (1).	No (1).	No (1).	Health Canada has determined that the health and environmental risks and the value of azadirachtin continue to be acceptable when used according to label directions (5). No Neurotoxicity (1).	No evidence of endocrine disruption. However, long term repeated oral exposure may result in the development of progressive liver injury with fibrosis. Repeated exposure may exacerbate liver injury produced from other causes (1).

Table 1b.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
Toxic to aquatic organisms. Aquatic Vertebrate: LC50 (96 hours): 13, 000 mg/L <i>Oncorhynchus mykiss</i> (Rainbow Trout) (1,2).	Foliar residue levels approximated 0.01mgkg <sup>-1</sup> f.w., strongly mitigating the potential effects of non-target biota in soil or aquatic compartments (4). The use of azadirachtin as a systemic insecticide for control of wood-boring insect pests such as emerald ash borer is unlikely to pose a significant risk of harm to aquatic or terrestrial decomposer invertebrates when leaves fall from insecticide-treated trees (3) from Sec. 5 Conclusions	Will not bioaccumulate (1).

References:

1. TreeAzin® Systemic Insecticide, Safety Data Sheet, May 6, 2019  
[http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204\\_2-%20May%206%202019.pdf](http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204_2-%20May%206%202019.pdf)
2. TREEAZIN® SYSTEMIC INSECTICIDE, Label, February 2020  
<http://www.bioforest.ca/UploadedFiles/files/CAN%20TreeAzin%20Specimen%2002-25-20.pdf>
3. Environmental safety to decomposer invertebrates of azadirachtin (neem) as a systemic insecticide in trees to control emerald ash borer, Ecotoxicology and Environmental Safety, David Kreuzweiser, et al, April 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/d\\_kreuzweiser\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/d_kreuzweiser_et_al_2011.pdf)
4. Foliar residue dynamics of azadirachtins following direct stem injection into white and green ash trees for control of emerald ash borer, Society of Chemical Industry, Susana Grimalt, et al, 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/s\\_grimalt\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/s_grimalt_et_al_2011.pdf)
5. Re-evaluation Decision RVD2018-32, Azadirachtin and It's Associated End-use Product, PMRA, October 15, 2018

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Environmental</b>	<b>Soil</b> (Erosion, Degradation, Biota, Carbon Storage)	<b>Minimal indication of adverse effects to soil when chemical is used according to label instructions.</b>  Foliar residue levels approximated 0.01mgkg <sup>-1</sup> f.w., strongly mitigating the potential effects of non-target biota in soil or aquatic compartments (4).
	<b>Water</b> (ground water, surface waters, water supplies)	<b>Water contamination is possible, during a spill situation, which would adversely affect aquatic organisms.</b>  Toxic to aquatic organisms. Aquatic Vertebrate: LC50 (96 hours): 13, 000 mg/L <i>Oncorhynchus mykiss</i> (Rainbow Trout) (1,2). Foliar residue levels approximated 0.01mgkg <sup>-1</sup> f.w., strongly mitigating the potential effects of non-target biota in soil or aquatic compartments (4).
	<b>Atmosphere</b> (air quality, greenhouse gasses)	<b>No indication of adverse effects to the atmosphere. Positive effects on air quality and reduced greenhouse gasses as a result of reduced tree mortality through the use of the chemical (1,2,5)</b>
	<b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)	<b>Negative impacts on non-target species exist for aquatic organisms and bees.</b>  Toxic to aquatic organisms and to bee brood. This product is systemic and is transported upwards through the tree. Bees may be exposed to residues in floral pollen and/or nectar resulting from tree injections. Applications to hardwood trees must be made post-bloom (2).
	<b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)	<b>Minimal adverse effects to non-timber forest products when chemical is used according to label instructions (5). Additional considerations are provided below:</b>  Toxic to bee brood. This product is systemic and is transported upwards through the tree. Bees may be exposed to residues in floral pollen and/or nectar resulting from tree injections. Applications to hardwood trees must be made post-bloom (2).
	<b>High Conservation Values</b>	<b>Minimal indication of adverse effects to HCVs when used according to label instructions and in accordance with</b>

	(particularly HCV 1-4)	<p><b>HCV Management Strategies. Additional considerations are provided below.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada and the Great Lakes and St. Lawrence Standard are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (6).</p>
	<b>Landscape</b> (aesthetics, cumulative impacts)	<p><b>Positive effects to Landscape values when chemical used according to label instructions. Additional considerations are provided below.</b></p> <p>Reduced mortality of ash trees has a positive aesthetic and environmental impact to the landscape (5).</p>
	<b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)	<p><b>Minimal indication of adverse effects to ecosystem services when chemical is used according to label instructions. Additional considerations are provided below.</b></p> <p>Toxic to aquatic organisms and to bee brood. This product is systemic and is transported upwards through the tree. Bees may be exposed to residues in floral pollen and/or nectar resulting from tree injections. Applications to hardwood trees must be made post-bloom (2). Reduced mortality of ash trees has a positive aesthetic and environmental (wildlife habitat and carbon sequestration) impact on the landscape (5).</p>

Table 3. A Description of potential risks pertaining to each Social Value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<p><b>Minimal indication of adverse effects to HCVs when chemical is used according to label instructions and in accordance with HCV Management Strategies.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada and Great Lakes St. Lawrence Standard are required to assess the status of HCVs 5 and 6 within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs (6).</p>
	<b>Health</b> (fertility, reproductive health, respiratory)	<p><b>Minimal indication of adverse effects to human health when chemical is used according to label instructions. However, additional considerations are provided below:</b></p>

<p>health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)</p>	<p>Health Canada has determined that the health and environmental risks and the value of azadirachtin continue to be acceptable when used according to label directions (5). However, may be harmful if swallowed, causes eye irritation, causes respiratory tract irritation, and long term repeated oral exposure may result in the development of progressive liver injury with fibrosis. Repeated exposure may exacerbate liver injury produced from other causes (1)</p>
<p><b>Welfare</b></p>	<p><b>Minimal indication of adverse effects to Welfare was found when used according to label instructions.</b></p> <p>Azadirachtin is a systemic insecticide used to manage specific insect pests of trees in forest, woodlot, urban, and residential landscapes. The chemical is not applied to organisms for human consumption. Required public notification, signage and treatment area monitoring minimize the risk of food gathering taking place in treated areas (2).</p>
<p><b>Food and Water</b></p>	<p><b>Minimal indication of adverse effects to food and water was when chemical is used according to label instructions.</b></p> <p>Health Canada has determined that the health and environmental risks and the value of azadirachtin continue to be acceptable when used according to label directions (5).</p>
<p><b>Social Infrastructure</b> (schools and hospitals, recreational infrastructure, infrastructure adjacent to the FMU)</p>	<p><b>Minimal indication of adverse effects to Social Infrastructure when chemical is used according to label instructions.</b></p> <p>Health Canada has determined that the health and environmental risks and the value of azadirachtin continue to be acceptable when used according to label directions (5).</p>
<p><b>Economic Viability</b> (agriculture, livestock, tourism)</p>	<p><b>Minimal indication of adverse effects to economic viability when chemical is used according to label instructions. Additional considerations are provided below:</b></p> <p>Azadirachtin is a systemic insecticide used to manage specific insect pests of trees in forest, woodlot, urban, and residential landscapes. There are not known risks to sensitive agricultural crops or range lands. Applications of chemical have a positive effect on the visual aesthetics for tourism. Reference???</p>
<p><b>Rights</b> (legal and customary)</p>	<p><b>Minimal indication of adverse effects to Rights, accept when access is restricted, when chemical used according to label instructions.</b></p> <p>The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) and the Great Lakes and St. Lawrence Standard the protection of legal and customary rights are considered in Principle 1 in regards to</p>

		tenure rights, in Principle 2 in regards to workers' rights, in Principle 3 in regards to Indigenous rights, and in Principle 4 in regards to the rights of local communities. With adherence to all applicable laws and the Standards, there is no risk to human rights (6).
	<b>Others</b>	<b>No additional values were identified in this assessment.</b>
<b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b>		

References

1. TreeAzin® Systemic Insecticide, Safety Data Sheet, May 6, 2019  
[http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204\\_2-%20May%206%202019.pdf](http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204_2-%20May%206%202019.pdf)
2. TREEAZIN® SYSTEMIC INSECTICIDE, Label, February 2020  
<http://www.bioforest.ca/UploadedFiles/files/CAN%20TreeAzin%20Specimen%2002-25-20.pdf>
3. Environmental safety to decomposer invertebrates of azadirachtin (neem) as a systemic insecticide in trees to control emerald ash borer, Ecotoxicology and Environmental Safety, David Kreutzweiser, et al, April 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/d\\_kreutzweiser\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/d_kreutzweiser_et_al_2011.pdf)
4. Foliar residue dynamics of azadirachtins following direct stem injection into white and green ash trees for control of emerald ash borer, Society of Chemical Industry, Susana Grimalt, et al, 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/s\\_grimalt\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/s_grimalt_et_al_2011.pdf)
5. Re-evaluation Decision RVD2018-32, Azadirachtin and it's Associated End-use Product, PMRA, October 15, 2018  
<https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/decisions-updates/reevaluation-decision/2018/azadirachtin.html>
6. The FSC National Forest Stewardship Standard of Canada  
<https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf>

Table 4. Strategies defined to minimize Environmental and Social Risks associated with the application of Azadirachtin.

<b>Exposure Elements</b>	<b>Mitigation Strategies</b>
<b>Environmental and Social Exposure Elements</b> <ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> <li>• Atmosphere</li> <li>• Non-Target Species</li> </ul>	<p><b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2, 3).</b></p> <p>Consider the use of alternative vegetation control measures on the FMU unless applying chemical is the only effective, practical, and cost-effective control measure</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation, -Understand how the mixture of active ingredients affects the pesticides risk profile. -Seek to minimize the frequency, interval, and amount of application.</p>



<ul style="list-style-type: none"> <li>• Non-Timber Forest Products</li> <li>• High Conservation Values (1-4)</li> <li>• Landscape</li> <li>• Ecosystem Services</li> <li>• High Conservation Values (5-6)</li> <li>• Health</li> <li>• Welfare</li> <li>• Food and Water</li> <li>• Social Infrastructure</li> <li>• Economic Viability</li> <li>• Rights</li> <li>• Others</li> </ul>	<p>Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. -Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. -Have appropriate, waste management systems in place.</p> <p>Mitigating Risk to the Environment: reduce contact with water resources and minimize application amounts and number of applications.</p> <p>General and non-target species: Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result.</p> <p>Water: This pesticide is toxic to aquatic organisms. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high-water mark. Do not contaminate water when cleaning equipment or disposing of equipment used water. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, or other waters. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. Do not apply to open water. Do not apply to saltwater bays or estuaries. Do not apply on ditches that are used to transport irrigation water.</p> <p>Storage: Keep in original container until use. Check any plastics for compatibility. Store in a cool, dry place, away from direct sunlight. To prevent contamination, store this product away from food or feed. Keep container tightly sealed when not in use. Do not store below 5 degrees Celsius or above 25 degrees Celsius.</p> <p>Mitigating Risk to Workers: Follow Label instructions specific to required Personal Protective Equipment (PPE). Practice good personal hygiene. At all times when handling pesticide, plan events in such a way as to minimize personal exposure. Locate wash stations with an adequate supply of fresh water on work vehicles. Wash thoroughly with soap and water after handling and before eating or smoking. Bathe or take a hot shower using plenty of soap after working with pesticide. Wear long sleeved shirt and long pants, or coveralls over short sleeves and short pants, chemical-resistant gloves and goggles or a face shield during handling, loading, application, removal, clean-up and repair of product and injection equipment.</p> <p>Mitigating Risk to Public Access/Public Welfare: Entry to treated areas by bystanders is restricted until all insecticide is injected into the trees.</p> <p>Disposal: Do not reuse the container for any purpose. Contact your local distributor/dealer or municipality for the location of the nearest collection site. Before taking the container to the collection site: 1. Triple- or pressure-rinse the empty container. Dispose of rinse liquid in accordance with provincial requirements. 2. Make the empty, rinsed container unsuitable for further use. If there is no container collection site in your area, dispose of the container in accordance with provincial requirements. For information on disposal of unused, unwanted product, contact the manufacturer or the provincial regulatory agency. Contact the manufacturer and the provincial regulatory agency in case of a spill, and for clean-up of spills.</p>
---	--

**Organization references regarding local conditions, specific label instructions and regulatory requirements:**

References:

1. TreeAzin® Systemic Insecticide, Safety Data Sheet, May 6, 2019  
[http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204\\_2-%20May%206%202019.pdf](http://www.bioforest.ca/UploadedFiles/files/TreeAzin%20SDS%20-%20EN%20-%20Revision%204_2-%20May%206%202019.pdf)
2. TREEAZIN® SYSTEMIC INSECTICIDE, Label, February 2020  
<http://www.bioforest.ca/UploadedFiles/files/CAN%20TreeAzin%20Specimen%2002-25-20.pdf>
3. Environmental safety to decomposer invertebrates of azadirachtin (neem) as a systemic insecticide in trees to control emerald ash borer, Ecotoxicology and Environmental Safety, David Kreuzweiser, et al, April 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/d\\_kreuzweiser\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/d_kreuzweiser_et_al_2011.pdf)
4. Foliar residue dynamics of azadirachtins following direct stem injection into white and green ash trees for control of emerald ash borer, Society of Chemical Industry, Susana Grimalt, et al, 2011  
[http://www.bioforest.ca/documents/assets/uploads/files/en/s\\_grimalt\\_et\\_al\\_2011.pdf](http://www.bioforest.ca/documents/assets/uploads/files/en/s_grimalt_et_al_2011.pdf)
5. Re-evaluation Decision RVD2018-32, Azadirachtin and it's Associated End-use Product, PMRA, October 15, 2018  
<https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/decisions-updates/reevaluation-decision/2018/azadirachtin.html>
6. The FSC National Forest Stewardship Standard of Canada  
<https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf>

**Dichlorprop Environmental and Social Risk Assessment (ESRA)**

This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Restricted		
<b>Chemical pesticide</b>	Dichlorprop-P: 210 g a.e./L 2,4-D: 400 g a.e./L	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Control of noxious weeds including invasive species such as Dog-strangling Vine and Spotted Knapweed that heavily degrade forest ecosystems. Effective control of deep-rooted species.

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of Dichlorprop.

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
<p>Acute and delayed symptoms and effects: May cause an allergic skin reaction. Causes skin irritation. Signs/symptoms may include localized redness, swelling, and itching. Harmful if swallowed. May be fatal if swallowed and enters airways. May cause gastrointestinal irritation. Signs/symptoms may include abdominal pain, stomach upset, nausea, vomiting and diarrhea. (2).</p>	<p>Acute and delayed symptoms and effects: Harmful if inhaled. May cause respiratory irritation. Signs/symptoms may include cough, sneezing, nasal discharge, headache, hoarseness, nose, and throat pain (2).</p>	<p>Product is not classified as a carcinogen (2).</p>	<p>Both 2,4-DP-P acid and 2,4-DP-P EHE are not genotoxic, carcinogenic, neurotoxic, or teratogenic (3).</p>	<p>Effects on reproduction and offspring survival were observed at doses that were also toxic to the maternal animals, indicating that the fetus is not more sensitive to 2,4-DP than adults are (3).</p>	<p>2,4-dichlorprop-P is unlikely to affect health when used according to label directions (3). Both 2,4-DP-P acid and 2,4-DP-P EHE are not genotoxic, carcinogenic, neurotoxic, or teratogenic (3).</p>

Table 1b.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
<p>This product contains an active ingredient and aromatic petroleum distillates which are toxic to aquatic organisms (1)</p>	<p>The use of this chemical may result in contamination of groundwater particularly in areas where soils are permeable (e.g., sandy soil) and/or the depth to the water table is shallow (1). Dichlorprop-P is non-persistent with the main route of transformation in the terrestrial environment being biotransformation in soil (3) Short persistence, half-life in soil; 1-2 weeks during the growing season (4).</p>	<p>A low risk to aquatic organisms was concluded for the metabolites (2,4-DCP and 2,4-DCA).The risk to potential bioaccumulation was also considered as low (5).</p>

References:

1. Label, Dichlorprop P [https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX\\_English.pdf](https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX_English.pdf), July 2019
2. SDS, Dichlorprop <https://www.ipco.ca/wp-content/uploads/2020/05/Dichlorprop-DX-OSHA-WHMIS-GHS-SDS-2020-03-26.pdf>, March 2020
3. Health Canada, Registration Decision, Dichlorprop P [https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt\\_formats/pdf/pubs/pest/decisions/rd2014-04/rd2014-04-eng.pdf](https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt_formats/pdf/pubs/pest/decisions/rd2014-04/rd2014-04-eng.pdf), March, 2014.
4. Ontario Crop IPM, OMAFRF, Dichlorprop 2,4-D, <http://www.omafra.gov.on.ca/IPM/english/weeds-herbicides/herbicides/dichlorprop.html>, March 2009
5. Peer review of the pesticide risk assessment of the active substance dichlorprop-P and variant dichlorprop-P-2-ethylhexyl, EFSA Journal, <https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2018.5288>. June. 2018.

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Environmental</b>	<b>Soil</b> (Erosion, Degradation, Biota, Carbon Storage)	<b>2,4-dichlorprop-P is unlikely to affect health when used according to label directions. Additional considerations are provided below.</b>  The use of this chemical may result in contamination of groundwater particularly in areas where soils are permeable (e.g., sandy soil) and/or the depth to the water table is shallow. To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay (3).
	<b>Water</b> (ground water, surface waters, water supplies)	<b>2,4-dichlorprop-P is unlikely to affect health when used according to label directions. Additional considerations are provided below.</b>  The use of this chemical may result in contamination of groundwater particularly in areas where soils are permeable (e.g., sandy soil) and/or the depth to the water table is shallow. To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay (3).
	<b>Atmosphere</b> (air quality, greenhouse gasses)	<b>An evaluation of available scientific information found that products containing dichlorprop do not present unacceptable risks to human health or the environment when used according to label directions (3).</b>
	<b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)	<b>2,4-dichlorprop-P is unlikely to affect health when used according to label directions. Additional considerations are provided below.</b>  In the terrestrial environment, Dichlorprop at the proposed application rate and use pattern may pose a risk to vascular plants, and predatory and parasitoid insects. These risks may

		be mitigated by applying spray buffer zones and other label statements. No risk was identified to earthworms, bees, or birds (3).
	<b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)	Mitigative measures are required to protect sensitive terrestrial and aquatic habitats from the use of dichlorprop. These mitigative measures include precautionary statements on the label regarding environmental hazards and the directions for use as well as appropriate buffer zones to protect sensitive habitats from spray drift (3).
	<b>High Conservation Values</b> (particularly HCV 1-4)	<b>Minimal indication of adverse effects to HCVs was used according to label instructions and in accordance with HCV Management Strategies. Additional considerations are provided below.</b>  Forest Manager's certified to the National Forest Stewardship Standard of Canada and Great Lakes St. Lawrence Standards are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (6).
	<b>Landscape</b> (aesthetics, cumulative impacts)	<b>Minimal indication of adverse effects to landscape values when used according to label instructions (3).</b>
	<b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)	<b>Minimal indication of adverse effects to ecosystem services when used according to label instructions. Additional considerations are provided below.</b>  The use of this chemical may result in contamination of groundwater particularly in areas where soils are permeable (e.g., sandy soil) and/or the depth to the water table is shallow. To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay (3).

Table 3. A Description of potential risks pertaining to each Social Value.

<b>Exposure Elements</b>	<b>Minimum List of Values</b>	<b>Description of why/why not a Risk</b>
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<b>Minimal indication of adverse effects to HCVs when used according to label instructions and in accordance with HCV Management Strategies.</b>  Forest Manager's certified to the National Forest Stewardship Standard of Canada and Great Lakes St. Lawrence Standards are required to assess the status of HCVs 5 and 6 within their Forest

	Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs (6).
<b>Health</b> (fertility, reproductive health, respiratory health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)	<b>Dichlorprop is unlikely to affect health when used according to label directions. However, additional considerations are provided in Table 1a related to human health concerns (3).</b>
<b>Welfare</b>	<b>Minimal indication of adverse effects to Welfare when used according to label instructions in forestry applications (5).</b>  Herbicide application for silviculture purposes is intended for target vegetation not consumed by people. Required public notification, signage, treatment area monitoring minimize the risk of food gathering taking place in treated areas. Labels instructional, including PPE and cleaning procedures minimize risk to forestry workers (1,2).
<b>Food and Water</b>	Dietary risks from food and water are not of concern. The acute and chronic dietary risk from dichlorprop is not of concern for all population subgroups (3).
<b>Social Infrastructure</b> (schools and hospitals, recreational infrastructure, infrastructure adjacent to the FMU)	<b>The product application directions on the label include statements to minimize spray drift. Thus, exposure health risks for bystanders in these environments are expected to be negligible (3).</b>
<b>Economic Viability</b> (agriculture, livestock, tourism)	<b>Minimal indication of adverse effects to economic viability when used according to label instructions in forestry applications. Additional considerations are provided below:</b>  Mitigative measures are required to protect sensitive terrestrial and aquatic habitats from the use of dichlorprop. These mitigative measures include precautionary statements on the label regarding environmental hazards and the directions for use as well as appropriate buffer zones to protect sensitive habitats from spray drift 3).
<b>Rights</b> (legal and customary)	<b>Minimal indication of adverse effects to Rights, accept when access is restricted, was when used according to label instructions in forestry applications.</b>

		The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) and Great Lakes St. Lawrence Standard the protection of legal and customary rights is considered in Principle 1 regarding tenure rights, in Principle 2 regarding workers' rights, in Principle 3 regarding Indigenous rights, and in Principle 4 regarding the rights of local communities. With adherence to all applicable laws and the NFSS, there is no risk to human rights (6).
	<b>Others</b>	<b>No additional values were identified in this assessment.</b>
<b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b>		

References

1. Label, Dichlorprop P [https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX\\_English.pdf](https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX_English.pdf), July 2019
2. SDS, Dichlorprop <https://www.ipco.ca/wp-content/uploads/2020/05/Dichlorprop-DX-OSHA-WHMIS-GHS-SDS-2020-03-26.pdf>, March 2020
3. Health Canada, Registration Decision, Dichlorprop P [https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt\\_formats/pdf/pubs/pest/decisions/rd2014-04/rd2014-04-eng.pdf](https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt_formats/pdf/pubs/pest/decisions/rd2014-04/rd2014-04-eng.pdf), March, 2014.
4. Ontario Crop IPM, OMAFRF, Dichlorprop 2,4-D, <http://www.omafra.gov.on.ca/IPM/english/weeds-herbicides/herbicides/dichlorprop.html>, March 2009
5. Peer review of the pesticide risk assessment of the active substance dichlorprop-P and variant dichlorprop-P-2-ethylhexyl, EFSA Journal, <https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2018.5288>. June. 2018.
6. The FSC National Forest Stewardship Standard of Canada <https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf>

Table 4. Strategies defined to minimize Environmental and Social Risks associated with the application of Simazine.

<b>Exposure Elements</b>	<b>Mitigation Strategies</b>
<b>Environmental and Social Exposure Elements</b> <ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> <li>• Atmosphere</li> <li>• Non-Target Species</li> <li>• Non-Timber Forest Products</li> </ul>	<p><b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2, 3).</b></p> <p>Consider the use of alternative vegetation control measures on the FMU unless applying dichlorprop is the only effective, practical, and cost-effective control measure.</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation and/or tank mixture, as its unique formulation may provide a different risk characterization. -Understand how the mixture of active ingredients affects the pesticides risk profile. -Seek to minimize the frequency, interval, and amount of application.</p>



<ul style="list-style-type: none"> <li>• High Conservation Values (1-4)</li> <li>• Landscape</li> <li>• Ecosystem Services</li> <li>• High Conservation Values (5-6)</li> <li>• Health</li> <li>• Welfare</li> <li>• Food and Water</li> <li>• Social Infrastructure</li> <li>• Economic Viability</li> <li>• Rights</li> <li>• Others</li> </ul>	<p>Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. Have appropriate, waste management systems in place.</p> <p>Mitigating Risk to the Environment: reduce contact with water resources and minimize application amounts and number of applications.</p> <p>Mitigating Risk to Workers: Follow Label instructions specific to required Personal Protective Equipment (PPE).</p> <p>Wear freshly laundered clothing and clean protective equipment daily. Rinse gloves before removal. Wash hands before eating, drinking, using tobacco, or using the toilet. If herbicide penetrates clothing, remove immediately, then wash thoroughly and put-on clean clothing. Throw away clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. After using this product, remove clothing and launder separately and promptly, and thoroughly wash hands and exposed skin with soap and water. Follow manufacturer's instructions for cleaning personal protective clothing and equipment. If no such instructions for washables are provided, use detergent and hot water. Keep and wash personal protective equipment separate from household laundry. After work, remove all clothing and shower using soap and water.</p> <p>Mitigating Risk to Public Access/Public Welfare: Reduce the possibility of public consumption of contaminated wild food (e.g., fruit or fungi) and public exposure to pesticides through public outreach and engagement, limiting access, and/or appropriate signage. For instance, users of the forest may be excluded from the area using barriers or signage until the pesticide dries. Consider effects on local communities and indigenous peoples when considering limiting access to treatment areas. Do not allow children or pets to enter the treated area until it has dried.</p>
<p><b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b></p>	

References:

1. Label, Dichlorprop P [https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX\\_English.pdf](https://www.ipco.ca/wp-content/uploads/2020/02/IPCO-Dichlorprop-DX_English.pdf), July 2019
2. SDS, Dichlorprop <https://www.ipco.ca/wp-content/uploads/2020/05/Dichlorprop-DX-OSHA-WHMIS-GHS-SDS-2020-03-26.pdf>, March 2020
3. Health Canada, Registration Decision, Dichlorprop P [https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt\\_formats/pdf/pubs/pest/\\_decisions/rd2014-04/rd2014-04-eng.pdf](https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/cps-spc/alt_formats/pdf/pubs/pest/_decisions/rd2014-04/rd2014-04-eng.pdf), March, 2014.

**National-level Glyphosate Environmental and Social Risk Assessment (ESRA)**

This ESRA was developed collaboratively by the FSC® Rest-of-Canada (ROC) User Group for nationwide applicability. This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Restricted		
<b>Chemical pesticide</b>	Glyphosate and its' salts	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Silviculture herbicide for the control of competing or non-desirable broadleaf vegetation. This product is applied for site preparation and tending operations. Application methods include stem injection, cut stump application, backpack foliar, hand-held wand, ground-based air blast sprayer or aerial application.

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of Glyphosate on the FMU.

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
Harmful if swallowed. Causes eye and skin irritation (2, 3).	Harmful if inhaled (2, 3).	No. The Pest Management Regulatory Agency deems it non-carcinogenic (2).	No (2, 3)	No (2, 3).	The data is not clear as to whether Glyphosate is an Endocrine Disrupter. However, when used according to label directions, occupational risks and post-application risks are not considered a concern (2)

Table 1b.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
Yes. Glyphosate formulations pose a negligible risk to freshwater fish and amphibians, but may pose a risk to freshwater algae, freshwater plants, marine/estuarine invertebrates, and marine fish if exposed to high enough concentrations. Hazard statements and mitigation measures (spray buffer zones) are required on product labels to protect aquatic organisms (2, 3).	No. Degraded microbially to aminomethyl phosphonic acid (AMPA), which is further degraded to simpler molecules. Representative field soil half-lives range from 1-130 days depending on soil/climatic conditions (1,4).	Negligible. Glyphosate and AMPA are strongly adsorbed to soil (3).

References:

5. Re-evaluation Decision RVD2017-01, Glyphosate, Pest Management Regulatory Agency, 28 April 2017, ISSN 1925-1025 Catalogue number; H113-28/2017-1E-PDF, <https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/decisions-updates/registration-decision/2017/glyphosate-rvd-2017-01.html>
6. Glyphosate Label Amendment, Bayer Canada, April 28, 2019, [https://www.roundup.ca/uploads/documents/Summary%20of%20label%20changes\\_Final.pdf](https://www.roundup.ca/uploads/documents/Summary%20of%20label%20changes_Final.pdf)
7. VisionMAX TM Silviculture Herbicide v2 SDS May 22, 2018, <https://www.roundup.ca/uploads/documents/msds/VisionMaxSilviculture-13382-EN-CA.518-1.pdf>

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Environmental</b>	<b>Soil</b> (Erosion, Degradation, Biota, Carbon Storage)	<p><b>Minimal indication of adverse effects to Soil was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> Glyphosate degraded microbially to aminomethyl phosphonic acid (AMPA), which is further degraded to simpler molecules. Representative field soil half-lives range from 1-130 days depending on soil/climatic conditions. Glyphosate and AMPA are strongly bound to soil particles and do not pose a risk from leaching. Glyphosate is eventually broken down by bacteria in the soil.</p> <p>This product is non-toxic to most organisms in the soil, such as earth worms. It is recommended to avoid soil disturbance prior to the application of Glyphosate and avoid disturbance of the soil for 7 days post-application.</p> <p>The application of glyphosate on steep slopes or loose soil, particularly when dominated by deciduous woody shrubs or saplings may pose an erosion risk (1, 2, 3, 4, 5, 11).</p>
	<b>Water</b> (ground water, surface waters, water supplies)	<p><b>Minimal indication of adverse effects to Water was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> Glyphosate formulations pose a negligible risk to freshwater fish and amphibians, but may pose a risk to freshwater algae, freshwater plants, marine/estuarine invertebrates, and marine fish if exposed to high enough concentrations. There is potential for contamination of water used for irrigation. However, risk of contaminated surface water for drinking water resources is low (1, 2, 3, 4, 5).</p>
	<b>Atmosphere</b> (air quality, greenhouse gasses)	<p><b>Minimal indication of adverse effects to Atmosphere was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> Glyphosate does not pose a risk to air quality or contribute to greenhouse gas emissions when applied in compliance with meteorological (weather) conditions, proper flying techniques and using calibrated / maintained equipment (1, 2, 3, 4, 5).</p>
	<b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)	<p><b>Most broadleaf plants will be killed or seriously injured by direct exposure to glyphosate, although there is a significant range of sensitivity among species. Minimal indication of adverse effects to other Non-target species (e.g., terrestrial microorganisms, mammals, invertebrates, and birds) was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> This product is non-selective and will harm most broadleaf vegetation which it is directly or indirectly (drift) applied to. Selective application methods allow desirable species to flourish which enables managers to meet sustainable forest management goals regarding species composition. Glyphosate may affect fish and wildlife indirectly because killing the plants alters the animals' habitat. Health Canada's PMRA tests have shown no toxicity to bees. Herbicides prevent plants from making certain proteins that are needed for plant growth. Glyphosate stops a specific enzyme pathway (i.e.</p>

		shikimic acid pathway) which is necessary for plants. Health Canada has conducted a detailed analysis of relevant studies to determine the impact of glyphosate use on pollinators, beneficial insects, and amphibians. It was determined that, when used according to label directions, glyphosate is not expected to pose a risk. Buffer zones prescribed for the protection of more sensitive aquatic organisms provide additional protection for amphibians (1, 2, 3, 5, 11).
	<b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)	<b>Minimal indication of adverse effects to Non-timber forest products (NTFPs) was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> The application of Glyphosate may temporarily reduce the availability of broadleaf plant related NTFP's within the treatment area for several years (10).
	<b>High Conservation Values</b> (particularly HCV 1-4)	<b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies. Additional considerations are provided below.</b> Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (10).
	<b>Landscape</b> (aesthetics, cumulative impacts)	<b>When used according to revised label directions, glyphosate products are not expected to pose risks of concern to the environment. Labelled risk-reduction measures mitigate potential risks posed by glyphosate formulations to non-target plants and freshwater/marine/estuarine organisms.</b> . In the terrestrial environment the only risk identified was for terrestrial plants, therefore, spray buffer zones are required to reduce exposure to sensitive terrestrial plants. Glyphosate breaks down in soil and water and is not expected to remain for long periods of time. (2). The application of glyphosate will be evident during the first few year's post-application.
	<b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)	<b>Minimal indication of adverse effects to ecosystem services was found when used according to label instructions in forestry applications. Additional considerations are provided below.</b> Glyphosate can pose a risk to water features if the product label, buffer zones and local/provincial regulations are not followed. Glyphosate can also pose a risk to water features by contamination from spills, run-off, or improper equipment washing/rinsing techniques. The application of glyphosate has less than 25% effect on the transformation of nitrogen and carbon in the soil profile, meaning glyphosate is not expected to impact soil conditions. Forestry applications of glyphosate could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time (1, 2, 3, 4, 5).
<b>Organization references regarding local conditions, specific label instructions, and regulatory requirements:</b>		

Table 3. A Description of potential risks pertaining to each Social Value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies.</b> Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess the status of HCVs 5 and 6 within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs. (10).
	<b>Health</b> (fertility, reproductive health, respiratory health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)	When used according to the label instructions, products containing glyphosate are not expected to pose risks of concern to human health or the environment. . Pesticides are registered for use in Canada only if the level of exposure to Canadians does not cause any harmful effects, including cancer. As part of the re-evaluation decision for glyphosate, Health Canada reviewed the dietary exposure to glyphosate and found that the levels found in food would not be a health risk to Canadians. Currently, no pesticide regulatory authority in the world, including Health Canada, considers glyphosate to be a carcinogenic risk of concern to humans. The PMRA is continuing to monitor activities of regulatory organizations. Health Canada will take appropriate action if human health or environmental risks of concern are identified.(2, 9)
	<b>Welfare</b>	<b>Minimal indication of adverse effects to Welfare was found when used according to label instructions in forestry applications.</b> Herbicide application for silviculture purposes are intended mainly for vegetation not consumed by people. Required public notification, signage and treatment area monitoring minimize the risk of food gathering taking place in treated areas. In addition, Glyphosate and Aminomethyl Phosphonic Acid (AMPA) are not expected to accumulate in animal tissues (5).
	<b>Food and Water</b>	<b>Minimal indication of adverse effects to food and water was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b> The Food and Drug Act prohibits the sale of any food product that contains pesticide residues exceeding the Maximum Residue Limit (MRL). Health Canada has set standards that limit the amount of Glyphosate residues that are expected to remain on food products. These levels are set well below what could potentially pose a health risk. In 2015, Canadian Food Inspection Agency tested samples of fruit, vegetables, and grain products for Glyphosate residues. The results show a high degree of compliance with the Government standards. In addition, Glyphosate and AMPA are not expected to accumulate in animal tissues. Risk of contamination of drinking water is low (1, 2, 3, 4, 5).
	<b>Social Infrastructure</b> (schools and	<b>Minimal indication of adverse effects to Social Infrastructure was found when herbicide is used according to label instructions in forestry applications (2).</b>

	hospitals, recreational infrastructure, infrastructure adjacent to the FMU)	
	<b>Economic Viability</b> (agriculture, livestock, tourism)	<b>Glyphosate application presents risk to sensitive non-target vegetation, which may have economic impacts.</b> When applied for forest management purposes the risk to sensitive agricultural crops or range lands is minimal. Forestry applications of glyphosate could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time (10).
	<b>Rights</b> (legal and customary)	<b>Minimal indication of adverse effects to Rights, accept when access is restricted, was found when used according to label instructions in forestry applications.</b> The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) the protection of legal and customary rights are considered in Principle 1 in regards to tenure rights, in Principle 2 in regards to workers' rights, in Principle 3 in regards to Indigenous rights, and in Principle 4 in regards to the rights of local communities, With adherence to all applicable laws and the NFSS there is no risk to human rights.
	<b>Others</b>	<b>No additional values were identified in this assessment.</b>
<b>Organization references regarding local conditions, specific label instructions, and regulatory requirements:</b>		

## References

1. Backgrounder Glyphosate half-Life in Soil, Updated October 2005, [https://biofortified.org/wp-content/uploads/2011/05/monsanto\\_glyphosate\\_halflife.pdf](https://biofortified.org/wp-content/uploads/2011/05/monsanto_glyphosate_halflife.pdf)
2. Re-evaluation Decision RVD2017-01, Glyphosate, Pest Management Regulatory Agency, 28 April 2017, ISSN 1925-1025 Catalogue number; H113-28/2017-1E-PDF, <https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/decisions-updates/registration-decision/2017/glyphosate-rvd-2017-01.html>
3. Glyphosate Label Amendment, Bayer Canada, April 28, 2019, [https://www.roundup.ca/uploads/documents/Summary%20of%20label%20changes\\_Final.pdf](https://www.roundup.ca/uploads/documents/Summary%20of%20label%20changes_Final.pdf)
4. VisionMAX TM Silviculture Herbicide label PCP 27736, [https://www.roundup.ca/uploads/documents/labels/27736\\_VisionMax\\_Approved\\_ENG\\_Label\\_12Jun\\_2019.pdf](https://www.roundup.ca/uploads/documents/labels/27736_VisionMax_Approved_ENG_Label_12Jun_2019.pdf)
5. VisionMAX TM Silviculture Herbicide v2 SDS May 22, 2018, <https://www.roundup.ca/uploads/documents/msds/VisionMaxSilviculture-13382-EN-CA.518-1.pdf>
6. International Agency for Research on Cancer (IARC), <https://www.iarc.fr/news-events/glyphosate-monograph-now-available/>
7. European Food Safety Authority (EFSA), <http://www.efsa.europa.eu/en/press/news/151112>
8. Australian Pesticide and Veterinary Medicines Authority, <https://apvma.gov.au/node/13891>
9. Health Canada - Pesticide and Pest Management, <https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management.html>

10. USDA/Forest Service. (2011). Glyphosate Human Health and Ecological Risk Assessment Final Report. Prepared by Syracuse Environmental Research Associates, Inc. under USDA Forest Service Contract AG-3187-C-06-0010, [https://www.fs.fed.us/foresthealth/pesticide/pdfs/Glyphosate\\_SERA\\_TR-052-22-03b.pdf](https://www.fs.fed.us/foresthealth/pesticide/pdfs/Glyphosate_SERA_TR-052-22-03b.pdf).
11. Henderson, A. M.; Gervais, J. A.; Luukinen, B.; Buhl, K.; Stone, D.; Cross, A.; Jenkins, J. 2010. *Glyphosate General Fact Sheet*; National Pesticide Information Center, Oregon State University Extension Services. <http://npic.orst.edu/factsheets/glyphogen.html>.

Table 4. Strategies defined to minimize Environmental and Social Risks associated with the Application of Glyphosate.

Exposure Elements	Mitigation Strategies
<p><b>Environmental and Social Exposure Elements</b></p> <ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> <li>• Atmosphere</li> <li>• Non-Target Species</li> <li>• Non-Timber Forest Products</li> <li>• High Conservation Values (1-4)</li> <li>• Landscape</li> <li>• Ecosystem Services</li> <li>• High Conservation Values (5-6)</li> <li>• Health</li> <li>• Welfare</li> <li>• Food and Water</li> <li>• Social Infrastructure</li> </ul>	<p><b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2).</b></p> <p>Consider the use of alternative vegetation control measures on the FMU unless applying glyphosate is the only effective, practical, and cost-effective control measure.</p> <p>Ensure proper consultation opportunities are made available to affected stakeholders and Indigenous communities.</p> <p>Ensure stratification within planned tending blocks is completed in order to tend only areas that require treatment. (GN)</p> <p>Ensure all reasonable points of access into the treatment area are posted to notify the public of the herbicide application.</p> <p>Ensure product is stored in the original container until being mixed and applied.</p> <p>Store product in a secure location, away from children, food, drink, and animal feed</p> <p>Ensure buffer zones are applied as specified in the label to capture any potential drift or run-off that may occur from the application. Do not apply during periods of dead calm. Avoid applications when winds are gusty.</p> <p>Apply only when the potential for drift to areas of human habitation or area of human activity such as houses, cottages, schools, and recreational areas is minimal. Take into consideration wind speed, wind direction, temperature inversions, application equipment and sprayer settings.</p> <p>Apply only when weather conditions at the treatment site allow for complete and even coverage. Ensure herbicide is mixed according to product label. Apply only under conditions of good practice, specifically aerial applications as outlined in the National Aerial Pesticide Application Manual.</p>



<ul style="list-style-type: none"> <li>• Economic Viability</li> <li>• Rights</li> <li>• Others</li> </ul>	<p>Avoid unintentional product contact with desirable foliage, desirable green stems, or the fruit of desirable crops as this product is non-selective and may harm to these plants.</p> <p>Ensure product is mixed with the specified volume of water for the specific application type and applied using properly calibrated and maintained equipment that can deliver desired volumes.</p> <p>Ensure any spills are promptly cleaned up and hazardous contaminated material is disposed of in an approved landfill or store in a secure location for collection by approved waste disposal service. Follow all local/regional/national/international regulations.</p> <p>Do not apply Glyphosate on steep slopes (i.e. slopes high risk of erosion, landslides and avalanches) or in loose soil conditions to avoid erosion, particularly on those sites dominated by deciduous stems that will be harmed and have potential to degrade the stability of the slope.</p> <p>Maintain compliance with product label and product application rates. Application rates should be based on undesirable species type and density of competing vegetation. Use minimum application rates to achieve results.(GN)</p> <p>Ensure applicators or other persons involved receive all necessary training and licensing requirements are maintained.</p> <p>Do not spray vegetation to the point of run-off.</p> <p>Do not mix or store product in galvanized or unlined steel containers, combustible gases may develop. Ensure product is mixed and transported in stainless steel, fiberglass, plastic, or aluminium containers with water only, unless otherwise specified.</p> <p>Limit the need for repeated applications by applying only under approved weather parameters.</p> <p>Make Safety Data Sheets readily available on-site.</p> <p>Have first aid kits, eye wash stations and spill kits readily available and on-site.</p> <p>Follow Label instructions specific to required Personal Protective Equipment (PPE).</p> <p>All persons involved in the application must wash hands and face before eating or drinking.</p> <p>Once Glyphosate application is complete, wash equipment in an area where there is no risk of contaminating water sources. Do not dispose of herbicide waste or wash equipment in or near any body of water that will allow run-off from equipment washing to enter waterway.</p> <p>All equipment should be washed post-application and product jugs rinsed three times and made unusable. Do not reuse container for any other purpose. For disposal, empty container may be returned to the point of purchase or disposed of</p>
--	---

	at an approved waste disposal location. Follow all local/regional/national/international regulations.
<b>Organization references regarding local conditions, specific label instructions, and regulatory requirements:</b>	

References:

1. VisionMAX TM Silviculture Herbicide label PCP 27736,  
[https://www.roundup.ca/uploads/documents/labels/27736\\_VisionMax\\_Approved\\_ENG\\_Label\\_12Jun2019.pdf](https://www.roundup.ca/uploads/documents/labels/27736_VisionMax_Approved_ENG_Label_12Jun2019.pdf)
2. VisionMAX TM Silviculture Herbicide v2 SDS May 22, 2018,  
<https://www.roundup.ca/uploads/documents/msds/VisionMaxSilviculture-13382-EN-CA.518-1.pdf>

**Imazapyr Environmental and Social Risk Assessment (ESRA)**

This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Imazapyr is not considered a highly hazardous pesticide (HHP) per the FSC Pesticide Policy (FSC-POL-30-001 V3-0 EN) and the FSC Lists of HHP (FSC-POL_30_00a EN)		
<b>Chemical pesticide</b>	Imazapyr	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Control of invasive species in non-cropland areas, including where contact with surface water is a risk

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of Imazapyr.

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
Harmful if swallowed. Slightly toxic after short-term skin contact. (1).	Relatively nontoxic after short-term inhalation (1).	Results of animal studies give no indication of a carcinogenic effect. Product has not been tested. (1)	Results of animal studies give no indication of a mutagenic effect. Product has not been tested. (1)	Results of animal studies give no indication of a reproductive or developmental effect. Product has not been tested. (1)	No. Imazapyr unlikely to affect human health provided that risk-reduction measures were implemented. (1).

Table 1b.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
High probability of being not acutely toxic to fish and invertebrates. High probability of being harmful to aquatic plants (1).	Does not persist in soil and water. Degrades in soil under aerobic conditions. Photodegrades in water with half-life of 0.54 to 5.3 days. Dissipates from water with half life of 0.9 to 13.8 days. (2)	No biomagnification or bioaccumulation (1).

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
Environmental	Soil (Erosion, Degradation, Biota, Carbon Storage)	<p><b>An evaluation of available scientific information found that products containing Imazapyr do not present unacceptable risks to human health or the environment when used according to label directions (1). Additional consideration is provided, below:</b></p> <p>Imazapyr highly unlikely to affect fish, mammals, or invertebrates (1). Do not apply to bodies of water where water may flow to agricultural lands or for irrigation use. Do not apply directly to water. (3)</p>

<p><b>Water</b> (ground water, surface waters, water supplies)</p>	<p><b>PMRA concludes that there are no acute or chronic risks of concern from groundwater or surface water under the current conditions of use (4). Additional consideration is provided, below.</b></p> <p>Imazapyr can affect crops or non-target plant species when water containing imazapyr comes in contact with crops or non-target species. Use according to label and avoid contact with water that may be used to irrigation or come in contact with crops or non-target plant species (1).</p>
<p><b>Atmosphere</b> (air quality, greenhouse gasses)</p>	<p><b>An evaluation of available scientific information found that products containing imazapyr do not present unacceptable risks to human health or the environment when used according to label directions (1,4).</b></p>
<p><b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)</p>	<p><b>Minimal indication of adverse effects to non-timber forest products when used according to label instructions. Additional considerations are provided below.</b></p> <p>Imazapyr can affect crops or non-target plant species when water containing imazapyr comes in contact with crops or non-target species. Use according to label and avoid contact with water that may be used to irrigation or come in contact with crops or non-target plant species (1).</p> <p>High probability of being not acutely toxic to fish and invertebrates. High probability of being harmful to aquatic plants (1).</p>
<p><b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)</p>	<p><b>Minimal indication of adverse effects to non-timber forest products when used according to label instructions (1,4).</b></p>
<p><b>High Conservation Values</b> (particularly HCV 1-4)</p>	<p><b>Minimal indication of adverse effects to HCVs when used according to label instructions and in accordance with HCV Management Strategies. Additional considerations are provided below.</b></p> <p>Forest Managers certified to the National Forest Stewardship Standard of Canada and Great Lakes St. Lawrence Standards are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (5).</p>
<p><b>Landscape</b> (aesthetics,</p>	<p><b>Minimal indication of adverse effects to landscape values when used according to label instructions (1,3).</b></p>

	cumulative impacts)	
	<b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)	<p><b>Minimal indication of adverse effects to ecosystem services when used according to label instructions (1). Additional considerations are provided below.</b></p> <p>Imazapyr is designed to target invasive species (1) and when used according to the label to meet FSC Standards will enhance ecosystem services by reducing impacts of invasive species (5).</p> <p>Imazapyr can affect crops or non-target plant species when water containing imazapyr comes in contact with crops or non-target species. Use according to label and avoid contact with water that may be used to irrigation or come in contact with crops or non-target plant species (1).</p> <p>High probability of being not acutely toxic to fish and invertebrates. No restrictions on recreation use of water. High probability of being harmful to aquatic plants (1).</p>

Table 3. A Description of potential risks pertaining to each Social Value.

<b>Exposure Elements</b>	<b>Minimum List of Values</b>	<b>Description of why/why not a Risk</b>
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<p><b>Minimal indication of adverse effects to HCVs when used according to label instructions and in accordance with HCV Management Strategies.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada and Great Lakes St. Lawrence Standards are required to assess the status of HCVs 5 and 6 within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs (5).</p>
	<b>Health</b> (fertility, reproductive health, respiratory health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)	<p><b>Minimal indication of adverse effects to human health when used according to label instructions (1, 4). However, additional considerations are provided below:</b></p> <p>Harmful if swallowed. Slightly toxic after short-term skin contact. Relatively non-toxic after short-term inhalation (1).</p>
	<b>Welfare</b>	<p><b>Minimal indication of adverse effects to Welfare when used according to label instructions in forestry applications (4).</b></p> <p>Imazapyr is intended to control invasive species not consumed by people or livestock. Required public notification, signage,</p>

		treatment area monitoring minimize the risk of food gathering taking place in treated areas. Labels instructional, including PPE and cleaning procedures minimize risk to forestry workers (1).
	<b>Food and Water</b>	<p><b>An evaluation of available scientific information found that products containing imazapyr do not present unacceptable risks to human health or the environment when used according to label directions (4). Additional considerations are provided, below.</b></p> <p>Dietary risks from food and drinking water are not of health concern.</p> <p>The proposed use of imazapyr on undesirable vegetation in non-cropland sites, including areas in or around specified aquatic sites, is not expected to contribute to inadvertent residues in crops and livestock and therefore would not pose a health risk of concern to any segment of the population, including infants, children, adults and seniors.</p> <p>Imazapyr does not bio-accumulate in freshwater or marine organisms, and consumption of fish or waterfowl from a treated aquatic environment are not of concern.</p> <p>Exposure to imazapyr in drinking water from the proposed uses is not expected to exceed the exposure to imazapyr in drinking water from the current registered uses for terrestrial, industrial and non-cropland areas. Therefore, risk due to exposure from drinking water is not of concern.(4)</p>
	<b>Social Infrastructure</b> (schools and hospitals, recreational infrastructure, infrastructure adjacent to the FMU)	<b>Minimal indication of adverse effects to Social Infrastructure was found when is used according to label instructions in forestry applications (1,4).</b>
	<b>Economic Viability</b> (agriculture, livestock, tourism)	<p><b>Minimal indication of adverse effects to economic viability when used according to label instructions in forestry applications. Additional considerations are provided below:</b></p> <p>The proposed use of imazapyr on undesirable vegetation in non-cropland sites, including areas in or around specified aquatic sites, is not expected to contribute to inadvertent residues in crops and livestock and therefore would not pose a health risk of concern to any segment of the population, including infants, children, adults and seniors.</p> <p>Imazapyr does not bio-accumulate in freshwater or marine organisms, and consumption of fish or waterfowl from a treated aquatic environment are not of concern.(4)</p>

		There are no restrictions on recreational water use in areas exposed to imazapyr when used according to the label (1).
	<b>Rights</b> (legal and customary)	<b>Minimal indication of adverse effects to Rights, except when access is restricted, when used according to label instructions in forestry applications. (1, 5)</b>  The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) and Great Lakes St. Lawrence Standard the protection of legal and customary rights is considered in Principle 1 in regards to tenure rights, in Principle 2 in regards to workers' rights, in Principle 3 in regards to Indigenous rights, and in Principle 4 in regards to the rights of local communities. With adherence to all applicable laws and the NFSS, there is no risk to human rights (6).
	<b>Others</b>	<b>No additional values were identified in this assessment.</b>
<b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b>		

Table 4. Strategies defined to minimize Environmental and Social Risks associated with the application of Imazapyr.

<b>Exposure Elements</b>	<b>Mitigation Strategies</b>
<b>Environmental and Social Exposure Elements</b> <ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> <li>• Atmosphere</li> <li>• Non-Target Species</li> <li>• Non-Timber Forest Products</li> <li>• High Conservation Values (1-4)</li> <li>• Landscape</li> <li>• Ecosystem Services</li> </ul>	<p><b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2, 3).</b></p> <p>Consider the use of alternative vegetation control measures on the FMU unless applying imazapyr is the only effective, practical, and cost-effective control measure.</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation and/or tank mixture, as its unique formulation may provide a different risk characterization. -Understand how the mixture of active ingredients affects the pesticides risk profile. -Seek to minimize the frequency, interval, and amount of application.</p> <p>Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. -Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. -Have appropriate, waste management systems in place.</p> <p>Mitigating Risk to the Environment: reduce contact with water resources and minimize application amounts and number of applications.</p> <p>General and non-target species: -Minimize risk of spray drift: unintentional spray drift has potential to significantly increase risk to the environment and public welfare. Follow product-specific guidelines for reducing spray drift for</p>



<ul style="list-style-type: none"> <li>• High Conservation Values (5-6)</li> <li>• Health</li> <li>• Welfare</li> <li>• Food and Water</li> <li>• Social Infrastructure</li> <li>• Economic Viability</li> <li>• Rights</li> <li>• Others</li> </ul>	<p>specific application scenarios. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result. Reduce volatilization potential by minimizing spray contact with non-permeable surfaces (roads, rocks), especially during higher air temperatures.</p> <p>Water: This pesticide has a very low toxicity to fish. Do not apply directly to open surface water. Do not contaminate water when cleaning equipment or disposing of equipment used water. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, or other waters.</p> <p>Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. Do not apply to open water. Do not apply to saltwater bays or estuaries. Do not apply on ditches that are used to transport irrigation water.</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation, as its unique formulation may provide a different risk characterization. Understand how the mixture of active ingredients affects the pesticides risk profile. Seek to minimize the frequency, interval, and amount of application. Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. Have appropriate waste management systems in place.</p> <p>Mitigating Risk to Workers: Follow Label instructions specific to required Personal Protective Equipment (PPE). • Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse these items. Follow manufacturer's instructions for cleaning/maintaining PPE and clothing. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry • Application crews should not walk-through treated vegetation, as foliar application occurs up to shoulder high brush.</p> <p>Mitigating Risk to Public Access/Public Welfare: Reduce the possibility of public consumption of contaminated wild food (e.g., fruit or fungi) and public exposure to pesticides through public outreach and engagement, limiting access, and/or appropriate signage. For instance, users of the forest may be excluded from the area using barriers or signage until the pesticide dries. Consider effects on local communities and indigenous peoples when considering limiting access to treatment areas. Do not allow children or pets to enter the treated area until it has dried.</p>
<p><b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b></p>	

References:

1. BASF, Safety Data Sheet, (Habitat Aqua), April 30, 2021  
[https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/sds-files/BASF\\_Habitat\\_Aqua\\_SDS.pdf](https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/sds-files/BASF_Habitat_Aqua_SDS.pdf)
2. BASF, Habitat Aqua FAQ. 2021  
[https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/tech-sheets/BASF\\_Habitat\\_Aqua\\_QA.pdf](https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/tech-sheets/BASF_Habitat_Aqua_QA.pdf)

3. BASF, Habitat Aqua Technology Sheet, 2021  
[https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/tech-sheets/BASF\\_Habitat\\_Aqua\\_TechSheet.pdf](https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/tech-sheets/BASF_Habitat_Aqua_TechSheet.pdf)  
(document is archived, and request must be made to publication office)
4. Pest Management Regulatory Agency, Proposed Registration Decision PRD2020-17, Imazapyr, Habitat Aqua <https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/consultations/proposed-registration-decisions/2020/imazapyr-habitat-aqua/document.html>
5. The FSC National Forest Stewardship Standard of Canada  
<https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf>
6. BASF, Product Label, Habitat Aqua (Imazapyr). [https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/label-files/BASF\\_Habitat\\_Aqua\\_Label.pdf](https://www.better-vegetation-management.basf.ca/content/dam/cxm/agriculture/better-vm/canada/english/label-files/BASF_Habitat_Aqua_Label.pdf)

**National-level Triclopyr Environmental and Social Risk Assessment (ESRA)**

This ESRA was developed collaboratively by the FSC® Rest-of-Canada (ROC) User Group for nationwide applicability. This document will be used by FSC® certified organizations and by certification bodies as a check list to assess conformance with the requirements of the FSC® Pesticides Policy (FSC-POL-30-001 V3-0).

<b>Date</b>			
<b>Forest Management Unit (FMU)</b>			
<b>Category of FSC Highly Hazardous Pesticide</b>	Triclopyr is not considered a highly hazardous pesticide (HHP) per the FSC Pesticide Policy (FSC-POL-30-001 V3-0 EN) and the FSC Lists of HHP (FSC-POL_30_00a EN)		
<b>Chemical pesticide</b>	Triclopyr	<b>Purpose of use</b> (protection of vegetation, logs, human health, livestock, native species, seeds, or seedlings, weed control, others)	Silviculture herbicide for the control of competing or non-desirable broadleaf vegetation. This product is applied for site preparation and tending operations.

Table 1a and 1b. Hazard Groups and Types of Hazards pertaining to the application of

HAZARD GROUPS & TYPES OF HAZARDS					
Acute Toxicity		Chronic Toxicity			
Toxic by Contact or Ingestion	Toxic by Inhalation	Carcinogenicity	Mutagenicity to Mammals	Developmental and Reproductive Toxicity	Endocrine Disruption
Brief contact may cause slight skin irritation with local redness. Eye contact is an irritant. Low toxicity if swallowed. (1).	No adverse effects are anticipated from single exposure to mist (1).	No. Active ingredient did not cause cancer in laboratory animals (1, 3, 4).	No. Active ingredient, in-vitro and animal genetic toxicity studies were negative (1)	No. Reproductive effects occurs as delays in development, but only at doses that cause visible material toxicity, therefore triclopyr is not considered a reproductive intoxicant. (1, 3).	The data is not clear as to whether Triclopyr is an Endocrine Disrupter. However, when used according to label directions, occupational risks and post-application risks are not considered a concern (1, 3)

Triclopyr on the FMU.

HAZARD GROUPS & TYPES OF HAZARDS		
Environmental Toxicity		
Acute Toxicity to Aquatic Organisms	Persistence in Soil and Water	Biomagnification -Bioaccumulation
Yes. Toxic to aquatic organisms on an acute basis. Hazard statements and mitigation measures (spray buffer zones) are required on product labels to protect aquatic organisms (1, 2, 4).	Material is expected to biodegrade only very slowly in the environment. Use may result in contamination of groundwater particularly in areas where soils are permeable (e.g. sandy soils) and/or where the depth to the water table is shallow (1, 2, 4).	Bioconcentration potential is moderate (1).

Table 1b.

References:

8. Corteva AgroSciences, Pesticide Product SDS, 2012 (Garlon TM RTU). <https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/sds/DF-Garlon-RTU-Herbicide-SDS-English.pdf>
9. Corteva AgroSciences, Pesticide Product Label, 2010 (Garlon TM RTU). <https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/label/DF-Garlon-RTU-Herbicide-Label-English.pdf>
10. Toxicology and Potential Health Risk of Chemicals that May Be Encountered by Forest Vegetation Management Workers. PART VI: RISK TO WORKERS USING TRICLOPYR FORMULATIONS, 1998, (RELEASE® OR GARLON®) <https://www.for.gov.bc.ca/hfp/publications/00017/8-Dost-Triclopyr.pdf>

Table 2. A Description of potential risks pertaining to each environmental value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Environmental</b>	<b>Soil</b> (Erosion, Degradation, Biota, Carbon Storage)	<p><b>Minimal indication of adverse effects to Soil was found when triclopyr is used according to label instructions in forestry applications. Additional considerations are provided, below.</b></p> <p>Potential for erosion if groundcover is exposed to herbicide. Adverse effects on terrestrial microorganisms is unlikely (4).</p>
	<b>Water</b> (ground water, surface waters, water supplies)	<p><b>Water contamination is possible, which would adversely affect aquatic plants (including algae):</b></p> <p>Groundwater contamination may occur particularly in areas where soils are permeable (e.g. sandy soils) and/or where the depth to the water table is shallow (2).</p> <p>Low risk to non-target species, including humans, associated with contaminated surface water. Substantial drift or off-site transport via runoff could result in acute effects in sensitive fish or aquatic vegetation. Triclopyr BEE has been found to be much more toxic than triclopyr TEA, and triclopyr acid to terrestrial plants and most groups of aquatic organisms. Acute and chronic toxicity data for aquatic animals generally indicate that triclopyr ACID and TEA are practically non-toxic to fish and invertebrates. Triclopyr BEE is moderately to highly toxic to these same taxa on an acute exposure basis. The chronic toxicity of triclopyr BEE to freshwater fish and invertebrates is greater than the ACID or TEA active ingredients. However, once it enters the environment, triclopyr BEE is rapidly converted to the less toxic acid form (4).</p>
	<b>Atmosphere</b> (air quality, greenhouse gasses)	<p><b>Minimal indication of adverse effects to atmosphere was found when triclopyr is used according to label instructions in forestry applications. Additional considerations are provided, below.</b></p> <p>Triclopyr BEE is more volatile than Triclopyr TEA (4).</p>
	<b>Non-Target Species</b> (vegetation, wildlife, bees and other pollinators, pets)	<p><b>Negative impacts on non-target species exist for plants and mammals.</b></p> <p>Triclopyr is slightly toxic to birds on an acute basis and is practically non-toxic to birds on a dietary basis. Triclopyr did not cause birth defects in laboratory animals but was toxic to the fetus in laboratory animals only at a dose toxic to the mother. Effects on reproduction occur at doses that produced significant toxicity to the parent animals (1).</p>

		<p>Triclopyr BEE is more toxic to fish than triclopyr acid (TEA); nonetheless, application of triclopyr BEE up to 3.363 kgs/ hectare does not reach a level of concern. However, accidental spill scenarios would likely result in substantial adverse effects on fish.</p> <p>Triclopyr BEE has been found to be much more toxic than triclopyr TEA, and triclopyr acid to terrestrial plants and most groups of aquatic organisms. Direct spray, substantial drift, and substantial runoff from the application site are expected to cause damage to aquatic and terrestrial macrophytes and algae, given that triclopyr is an effective herbicide. Triclopyr is considered “practically non-toxic” to bees; general risks to terrestrial invertebrates are related to changes in vegetation cover (4).</p>
	<p><b>Non-Timber Forest Products</b> (as FSC-STD-01-001 V5-2 FSC Principles and Criteria, criterion 5.1)</p>	<p><b>Minimal indication of adverse effects to non-timber forest products was found when triclopyr is used according to label instructions in forestry applications. Additional considerations are provided below.</b></p> <p>Secondary effects to habitats and food availability could occur, which would affect non-target organisms. These secondary effects caused by herbicide could either be detrimental or beneficial to affected species (4).</p>
	<p><b>High Conservation Values</b> (particularly HCV 1-4)</p>	<p><b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies. Additional considerations are provided below.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess HCV status within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs. Herbicide application in accordance with those HCV Management Strategies will ensure that identified HCV's (1-4) are maintained or enhanced thus eliminating risk to HCV's (6).</p>
	<p><b>Landscape</b> (aesthetics, cumulative impacts)</p>	<p><b>Minimal indication of adverse effects to Landscape values was found when used according to label instructions in forestry applications. Additional considerations are provided below.</b></p> <p>Unintentional habitat/ landscape effects are possible. The application of triclopyr will be evident during the first few year's post-application (4).</p>
	<p><b>Ecosystem Services</b> (water, soil, carbon sequestration, tourism)</p>	<p><b>Minimal indication of adverse effects to ecosystem services was found when used according to label instructions in forestry applications. Additional considerations are provided below.</b></p> <p>Triclopyr can pose a risk to water features if the product label, buffer zones and local/provincial regulations are not followed. Triclopyr can also pose a risk to water features by</p>

		contamination from spills, run-off, or improper equipment washing/rinsing techniques. Forestry applications of triclopyr could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time (1, 2, 4).
--	--	---

Table 3. A Description of potential risks pertaining to each Social Value.

Exposure Elements	Minimum List of Values	Description of why/why not a Risk
<b>Social</b>	<b>High Conservation Values</b> (especially HCV 5-6)	<p><b>Minimal indication of adverse effects to HCVs was found when used according to label instructions in forestry applications and in accordance with HCV Management Strategies.</b></p> <p>Forest Manager's certified to the National Forest Stewardship Standard of Canada are required to assess the status of HCVs 5 and 6 within their Forest Management Unit and ensure that proper HCV Management and Monitoring Strategies are in place to maintain or enhance those HCVs as required within Principle 9 of the Standard. Herbicide application in accordance with those HCV Management Strategies would reduce risk to the HCVs (6).</p>
	<b>Health</b> (fertility, reproductive health, respiratory health, dermatologic, neurological, and gastrointestinal problems, cancer, and hormonal imbalance)	<p><b>Minimal indication of adverse effects to human health was found when triclopyr is used according to label instructions in forestry applications. However, additional considerations are provided below:</b></p> <p>In laboratory animal studies, effects on reproduction, delays in development, have been seen only at doses that produced significant toxicity to the parent animals. Triclopyr did not cause birth defects in laboratory animals. Triclopyr did not cause cancer in laboratory animals. In-vitro and animal genetic toxicity studies were negative (1).</p> <p>In laboratory animal studies high doses over long periods result in limited and reversible kidney and liver effects. Humans were found to excrete triclopyr very rapidly. Evidence shows that triclopyr does not have potential to cause cancer or mutation and workers are free of such risks when adhering to proper worker protections as outline in the Label (3).</p>
	<b>Welfare</b>	<p><b>Minimal indication of adverse effects to Welfare was found when used according to label instructions in forestry applications.</b></p> <p>Herbicide application for silviculture purposes are intended mainly for vegetation not consumed by people. Required public notification, signage and treatment area monitoring minimize the risk of food gathering taking place in treated areas (2).</p>
	<b>Food and Water</b>	<p><b>Minimal indication of adverse effects to food and water was found when used according to label instructions in forestry applications. Additional considerations are provided, below.</b></p>

		<p>The Canada Food and Drug Act prohibits the sale of any food product that contains pesticide residues exceeding the Maximum Residue Limit (MRL). Health Canada has set standards that limit the amount of Triclopyr residues that are expected to remain on food products. These levels are set well below what could potentially pose a health risk. In 2015, Canadian Food Inspection Agency tested samples of fruit, vegetables, and grain products for triclopyr residues (5).</p> <p>Risk of contact with contaminated vegetation, fruit, and water. However, these scenarios are extremely low risk due to the implausibility of acute or long-term occurrences. (4)</p>
	<p><b>Social Infrastructure</b> (schools and hospitals, recreational infrastructure, infrastructure adjacent to the FMU)</p>	<p><b>Minimal indication of adverse effects to Social Infrastructure was found when herbicide is used according to label instructions in forestry applications (2).</b></p>
	<p><b>Economic Viability</b> (agriculture, livestock, tourism)</p>	<p><b>Minimal indication of adverse effects to economic viability was found when triclopyr is used according to label instructions in forestry applications. Additional considerations are provided below:</b></p> <p>When applied for forest management purposes the risk to sensitive agricultural crops or range lands is minimal. Forestry applications of triclopyr could impact the visual aesthetics for tourism operations, but this impact would diminish over short period of time.</p> <p>Risks to non-target plant species due to drift, with highest risk due to aerial application and lowest from backpack application. Exposure of non-target plants is possible through contaminated irrigation water, but concentrations will likely not reach level of concern (4).</p>
	<p><b>Rights</b> (legal and customary)</p>	<p><b>Minimal indication of adverse effects to Rights, accept when access is restricted, was found when used according to label instructions in forestry applications.</b></p> <p>The protection of legal and customary rights is an important consideration of forest management planning and operations. Within the National Forest Stewardship Standard (NFSS) the protection of legal and customary rights are considered in Principle 1 in regards to tenure rights, in Principle 2 in regards to workers' rights, in Principle 3 in regards to Indigenous rights, and in Principle 4 in regards to the rights of local communities. With adherence to all applicable laws and the NFSS, there is no risk to human rights (6).</p>
	<p><b>Others</b></p>	<p><b>No additional values were identified in this assessment.</b></p>
<p><b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b></p>		

References



1. Corteva AgroSciences, Pesticide Product SDS, 2012 (Garlon TM RTU).  
<https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/sds/DF-Garlon-RTU-Herbicide-SDS-English.pdf>
2. Corteva AgroSciences, Pesticide Product Label, 2010 (Garlon TM RTU).  
<https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/label/DF-Garlon-RTU-Herbicide-Label-English.pdf>
3. Toxicology and Potential Health Risk of Chemicals that May Be Encountered by Forest Vegetation Management Workers. PART VI: RISK TO WORKERS USING TRICLOPYR FORMULATIONS, 1998, (RELEASE® OR GARLON®)  
<https://www.for.gov.bc.ca/hfp/publications/00017/8-Dost-Triclopyr.pdf>
4. USDA/Forest Service. (2011). Triclopyr Human Health and Ecological Risk Assessment. Prepared by Syracuse Environmental Research Associates, Inc. under USDA Forest Service Contract AG-3187-C-06-0010.  
[https://www.fs.fed.us/foresthealth/pesticide/pdfs/Triclopyr\\_TR-052-25-03b.pdf](https://www.fs.fed.us/foresthealth/pesticide/pdfs/Triclopyr_TR-052-25-03b.pdf)
5. Health Canada, Maximum Residue Limits for Pesticides, 2012-10-01  
<https://pr-rp.hc-sc.gc.ca/mrl-lrm/index-eng.php>
6. [The FSC National Forest Stewardship Standard of Canada](https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf)  
<https://ca.fsc.org/preview.fsc-std-can-01-2018-en-v1.a-2364.pdf>

Table 4. Strategies defined to minimize Environmental and Social Risks associated with the Application of Triclopyr.

Exposure Elements	Mitigation Strategies
<p><b>Environmental and Social Exposure Elements</b></p> <ul style="list-style-type: none"> <li>• Soil</li> <li>• Water</li> <li>• Atmosphere</li> <li>• Non-Target Species</li> <li>• Non-Timber Forest Products</li> <li>• High Conservation Values (1-4)</li> <li>• Landscape</li> <li>• Ecosystem Services</li> <li>• High Conservation Values (5-6)</li> <li>• Health</li> </ul>	<p><b>Follow all pesticide label application instructions, including all updates to label. Organizations should take reasonable steps toward avoiding environmental and social impacts by following the mitigation strategies provided below as well as organization or site-specific strategies (1, 2, 3).</b></p> <p>Consider the use of alternative vegetation control measures on the FMU unless applying triclopyr is the only effective, practical, and cost-effective control measure</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation and/or tank mixture, as its unique formulation may provide a different risk characterization. -Understand how the mixture of active ingredients affects the pesticides risk profile. -Seek to minimize the frequency, interval, and amount of application.</p> <p>Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. -Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. -Have appropriate, waste management systems in place.</p> <p>Mitigating Risk to the Environment: reduce contact with water resources and minimize application amounts and number of applications.</p> <p>General and non-target species: -Minimize risk of spray drift: unintentional spray drift has potential to significantly increase risk to the environment and public welfare. Follow product-specific guidelines for reducing spray drift for specific application scenarios. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result. Reduce volatilization potential by minimizing spray contact with non-permeable surfaces (roads, rocks), especially during higher air temperatures.</p>

<ul style="list-style-type: none"> <li>• Welfare</li> <li>• Food and Water</li> <li>• Social Infrastructure</li> <li>• Economic Viability</li> <li>• Rights</li> <li>• Others</li> </ul>	<p>Water: This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high-water mark. Do not contaminate water when cleaning equipment or disposing of equipment used water. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, or other waters.</p> <p>Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. Do not apply to open water. Do not apply to saltwater bays or estuaries. Do not apply on ditches that are used to transport irrigation water.</p> <p>General consideration of exposure variables designed to mitigate risk: Know and understand the specific pesticide formulation, as its unique formulation may provide a different risk characterization. Understand how the mixture of active ingredients affects the pesticides risk profile. Seek to minimize the frequency, interval, and amount of application. Use the most efficient and effective method of application by seeking to minimize risk to environmental and social values. Understand the site (e.g., soil type, topography, etc.) and climatic (e.g., wind, temperature, and humidity) conditions and the likely effect on risk to environmental and social values. Have appropriate waste management systems in place.</p> <p>Mitigating Risk to Workers: Follow Label instructions specific to required Personal Protective Equipment (PPE). • Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse these items. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry • Application crews should not walk through treated vegetation, as foliar application occurs up to shoulder high brush.</p> <p>Mitigating Risk to Public Access/Public Welfare: Reduce the possibility of public consumption of contaminated wild food (e.g., fruit or fungi) and public exposure to pesticides through public outreach and engagement, limiting access, and/or appropriate signage. For instance, users of the forest may be excluded from the area using barriers or signage until the pesticide dries. Consider effects on local communities and indigenous peoples when considering limiting access to treatment areas. Do not allow children or pets to enter the treated area until it has dried.</p>
<p><b>Organization references regarding local conditions, specific label instructions and regulatory requirements:</b></p>	

References:

1. Corteva AgroSciences, Pesticide Product SDS, 2012 (Garlon TM RTU).  
<https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/sds/DF-Garlon-RTU-Herbicide-SDS-English.pdf>
2. Corteva AgroSciences, Pesticide Product Label, 2010 (Garlon TM RTU).  
<https://www.corteva.ca/content/dam/dpagco/corteva/na/ca/en/files/products/label/DF-Garlon-RTU-Herbicide-Label-English.pdf>
3. USDA/Forest Service. (2011). Triclopyr Human Health and Ecological Risk Assessment. Prepared by Syracuse Environmental Research Associates, Inc. under USDA Forest Service Contract AG-3187-C-06-0010.  
[https://www.fs.fed.us/foresthealth/pesticide/pdfs/Triclopyr\\_TR-052-25-03b.pdf](https://www.fs.fed.us/foresthealth/pesticide/pdfs/Triclopyr_TR-052-25-03b.pdf)

