



Forest Stewardship Council®



Revision FSC Pesticides Policy Synopsis of consultation comments on 1st draft

Synopsis of consultation comments on the 1st draft of the FSC Pesticides Policy (FSC-POL-30-001 V3-0)

This document has been prepared in accordance with FSC-PRO-01-001 (V3-1), and contains an analysis of the range of stakeholder groups that submitted comments, as well as a summary of the issues raised, [a general response to the comments, and a response on how they were addressed \(in blue\)](#).

1. Consultation

The consultation on the 1st draft of the FSC Pesticides Policy took place between the 31st July and the 29th October 2017.

The draft and the supportive documents with the differences between the existing policy and the revised draft, the information about the revision process and the consultation were uploaded to the FSC Consultation Platform (<https://consultation-platform.fsc.org/>) together with a questionnaire. All materials were available in English and Spanish.

The consultation was announced on the FSC website, newsletters, social media, and circulated to certification bodies, FSC membership, consultative forum, standard development groups and other key stakeholders, in particular from the environmental and social chamber.

Stakeholders were asked to provide their feedback on the draft overall, including their views on the proposed approach and the associated implementation procedure, as well as for their suggestions on how to improve specific elements of the policy.

During the consultation period the FSC Forest Management Programme and the Pesticides Policy Working Group (PPWG) conducted four webinars in English and Spanish for different time zones to present the changes in draft 1, respond to questions and collect feedback.

We also conducted a side meeting about the revision of the FSC Pesticides Policy at the FSC General Assembly 2017 to collectively speak with stakeholders from all chambers, encourage lively discussion and collect comments.

After the stakeholder consultation, the PPWG analyzed the comments received in the FSC consultation platform, webinars, side event and via email and identified the core topics to be discussed in the development of the second draft.

During the PPWG face to face meeting held in December 2017 in Lisbon (Portugal), the PPWG members assessed once more the feedback received and agreed on the responses to the comments and on how to incorporate them to the draft.

The FSC Forest Programme and the PPWG appreciate the high participation and the feedback received.

Note: This document does not reproduce all comments and PPWG discussion, but a compilation of the main messages received from the various stakeholder groups and of the PPWG agreements.

2. Range of stakeholder consultation participants

A total of 152 stakeholder from 45 countries provided comments through the consultation platform. The respondents identified themselves in the following ranges:

- **Certificate holder:** 30%
- **FSC member:** 16%

The FSC members represented the following chambers:

Economic chamber		Environmental chamber		Social chamber		Did not reply
South	North	South	North	South	North	60%
20%	13%	2%	2%	2%	1%	

- **Consultant:** 10%
- **FSC Network Partner staff:** 7%
- **FSC International staff:** 5%
- **Certification body/auditor:** 2%
- **Other:** 30%

The total respondents represented the following interests:

Economic	Environmental	Social	Did not reply
45%	28%	8%	19%

The respondents indicated the following work experience with pesticides and related issues in the field:

I have no direct experience with this topic	1-2 years	3-4 years	5-10 years	>10 years	Did not reply
14%	3%	3%	7%	34%	39%

The respondents indicated the following formal qualifications regarding toxicology and/or pesticides and their management:

None	Certificate	Bachelor degree	Master's Degree	PhD	Did not reply
20%	7%	8%	4%	7%	41%

3. Summary of the issues raised and PPWG response to the comments

3.1 Process

How comfortable do you feel with the set-up of this revision process?

Very comfortable	Comfortable	Not comfortable	I have no opinion on this	Did not reply
17%	45%	5%	14%	19%

The main messages from stakeholders were:

- The concerns raised by stakeholder in the past are being addressed.
- Pesticides Policy Working Group (PPWG) represents all range of relevant backgrounds, has a well-balanced composition and a science based dialogue.
- It took time to identify environmental and social candidates for the working group.
- Countries from WG members should not be repeated.
- The revision timeline should be kept as shorter as possible
- Poor engagement in some parts of the process.

The FSC Forest Programme and the PPWG appreciates the comments expressed and considers a step forward the involvement of an interest balance working group with technical experts representing north and south in this process. Special attention has been given during the process to communication and stakeholder engagement.

3.2 Suggested approach

How supportive are you with shifting from the existing hazard-based approach to a risk-based approach, where risk is a combination of hazard and exposure?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
41%	25%	3%	1%	4%	25%

The comments of disagreement indicated that taking a precautionary approach, a hazard based approach would be safer.

It was also highlighted that the proposal is a hazard based approach with additional measures to control remaining risks.

Do you consider that the specific proposal to incorporate risk to the Policy presented by the PPWG can contribute to achieving the objectives of the Policy?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
25%	30%	14%	3%	3%	25%

The reasons in favor mentioned were that this proposal will help to mitigate hazard and minimize harm, it is sensible and pragmatic if effectively implemented, it raises awareness of the impacts of using pesticides, risk evaluation concept has been

recognized by FAO to evaluate and mitigate risks and it allows regional and local adaptation.

The concerns raised regarding this proposal refer to the need of a correct implementation, a potential conflict of interest if the Organization assess the risk and that risk assessment is complex and might be costly.

The policy approach proposed by the PPWG in draft 1 was supported and remains in draft 2. The PPWG clarifies in draft 2 that the proposal includes a two-step approach where both hazard and risk are considered.

The concerns raised refer to the implementation, rather than to the policy. The FSC system counts with several mechanism to ensure a correct implementation and efforts to ensure this will be made in the development of the specifications of the policy and the information exchange database.

Can you describe a more effective alternative to incorporate a risk-based approach to the Policy?

Yes	No	Did not reply
17%	51%	32%

A majority of the respondents considers this alternative a good proposal.

Other alternatives suggested are:

- No additional requirements are needed in countries where the legislation is effective enough.
- A precautionary based approach as the derogation system would be safer.
- Include phase out periods for hazardous pesticides (with few permanent exceptions).

The PPWG considers the use of pesticides a sensitive activity and agrees on the importance of raising awareness and encourage a reduction of their use and best practices to minimize negative impacts to human health and the environment.

While there are success stories about the derogation process, this mechanism has often be questioned.

Regarding phase out periods, FSC prohibited pesticides will be phased out with the implementation of the policy. The PPWG has discussed the possibility of including phase out periods for highly restricted and restricted HHPs but is not including this proposal in the second draft. However, the WG would support that this is further re-analyzed in following revisions of the policy.

3.3 Requirements for third party suppliers

What are some of the challenges and/or opportunities that you foresee if products from third party suppliers are included in the scope of the Policy?

The opportunities mentioned by the respondents were:

- Enhance and reinforce the policy, supporting the reduction and elimination of the use of HHPs and associated negative impacts.
- Encourage them to become certified.
- Increased market opportunities, improved benefits.
- Raise awareness
- Encourages research into less hazardous alternatives and best practices.
- Additional income for CBs.
- Greater transparency and credibility.

The challenges mentioned by the respondents were:

- More complex audits.
- Financially detrimental for nurseries.
- Difficult to enforce due to limited influence over third party suppliers. FSC certified companies are often a minority of their clients.
- Higher audit costs.
- Nurseries have different conditions and needs. It does not improve forest state.
- Burden.
- Market challenges. Constrains in supply of products to stakeholders.

The PPWG acknowledges the challenges of including third party suppliers in the scope of the policy.

To support the objective of the policy, the PPWG is proposing in draft 2 that third-party nursery suppliers and processing plants within the Management Unit are informed about the requirements in the FSC pesticides policy and encouraged to avoid FSC prohibited HHPs. The Organization shall enquire these parties about their use of FSC prohibited HHPs and keep records.

This does not apply to other third party suppliers (eg. poles, structural materials, etc.). Regarding FSC certified nurseries, the PPWG believe that workers in forests and nurseries have to be protected in the same way, and they remain in the scope.

3.4 Definitions

Are the definitions clear?

Yes	No	Did not reply
41%	16%	42%

Are there other terms that need to be defined to provide clarity or coherence to the Policy?

Yes	No	Did not reply
39%	13%	48%

In response to the comments received, the following terms have been defined or clarified: environmental and social risk assessment (variables, what it has to deliver, independence, social elements), FSC highly restricted HHPs, FSC restricted HHPs, pesticides, emergency, Organization, silviculture, PAN, biopesticides.

3.5 Identification of highly hazardous pesticides

Please indicate how comfortable you feel with the selection of the criteria to identify highly hazardous pesticides?

Very comfortable	Comfortable	Not comfortable	I have no opinion on this	Did not reply
11%	26%	10%	9%	45%

Is there any criterion that you do not consider relevant for the identification of HHPs?

Criteria	Percentage	Reasons
Heavy metals	6%	- Traces can be present in materials with natural origin. - Not relevant if PPE are used. - Not a criteria but a chemical group.
Endocrine disruptors	5%	- Not a criteria but a mode of action. The type of effect (repro / carc) should be the criteria, not the mode of action
Acute toxicity to aquatic organisms	5%	- Sometimes pesticides are not used close to water courses
Developmental and reproductive toxicity	5%	
Mutagenicity to mammals	4%	
Carcinogenicity	4%	-Some substances can produce cancer and are not prohibited (eg. tobacco)
Dioxins	3%	-Not a criteria but a chemical group.
Relevant International Agreements or conventions	2%	-Some countries have legislations that adequately regulates pesticide use.
Acute toxicity to mammals and birds	1%	
Persistence in soil or water and soil sorption potential and bio-magnification and bio-accumulation	1%	-Frequency of application in forestry is low
Did not reply	88%	

Other reasons mentioned by respondents:

- In countries with robust and effective regulations on pesticides, adding an additional layer of assessment is unnecessary and does not increase protection of human health or the environment.
- The criteria are relevant but they should only be assessed if they pose a definitive risk to people or environment.
- Criteria are not relevant but the way pesticides are used.

Are there other relevant evaluation criteria that should be considered to identify HHPs?

Yes	No	I don't know	Did not reply
13%	16%	23%	47%

Other criteria mentioned by respondents are:

- Evaluation of European Food Safety Authority (EFSA)
- Likelihood to get into water
- Impact on non-target organisms

- Full EDCs effects, mixture effects, genotoxicity including epigenetic effects, effects of formulations and wetting agents, effects when in mixtures with fertilizers in water, current appraisal of toxicology and adverse effects etc.,
- Criteria are not relevant but the way pesticides are used.
- Ability for wind/air dispersion
- Pesticide ratings of international organizations and governments, scientific studies, and reports of poisoning incidents or negative effects on non-target organisms.
- Conditions of use
- Impact of herbicides and in particular half-life of parent and metabolite molecules.
- Bee toxicity

As in draft 1, the working group has endorsed the current criteria used by FSC to identify HHPs, listed in FSC-STD-30-001 V1-0 *Indicators and thresholds for the identification of 'highly hazardous' pesticides (HHP)*, as they are internationally recognized, based on science, there is evidence of their high toxicity, and have been developed following usual FSC procedures and approved by the FSC Board of Directors.

The proposal to the PPWG follows a stepwise approach, where as a first step hazard is considered. The context of use is addressed in the second step: the risk assessment (eg. frequency of application, proximity to water courses, use of PPE, etc.).

3.6 Prioritization and categorization of HHPs

How much do you agree with the criteria selected to identify FSC prohibited pesticides?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
9%	30%	13%	5%	1%	41%

Which are the criteria that you consider the most relevant to identify HHPs that should be prohibited in FSC certified forests?

Criteria	Percentage	Reasons
Relevant International Agreements or conventions	34%	Based on scientific evidence, include the most toxic pesticides,
Persistence in soil or water and soil sorption potential and bio-magnification and bio-accumulation	22%	Relevance for drinking water and food chain
Heavy metals	20%	Effect on health
Acute toxicity to mammals and birds	20%	Impact on humans
Dioxins	18%	Effect on health
Carcinogenicity	18%	Impact on humans
Mutagenicity to mammals	17%	Impact on humans
Acute toxicity to aquatic organisms	16%	

Criteria	Percentage	Reasons
Developmental and reproductive toxicity	14%	Impact on humans
Endocrine disruptors	14%	Impact on humans
Did not reply	56%	

Other reasons mentioned by respondents are: the criteria follow well established approach, all can be relevant depending on the level of exposure, and they represent have medium and long term effects, very high hazard.

Most of the respondents considered the suggested way to prioritize the evaluation criteria a step forward. Only a few suggested other ways: give the same priority to each criterion or assigning a different priority to each HHP.

In the second draft the PPWG maintains this way of prioritizing HHPs as it is easy and simple to understand and was supported by most stakeholders and is science- and evidence-based. The pesticides listed under in the International Conventions are prohibited because they have been banned or severely restricted for health or environmental reasons in at least two regions and there is evidence of adverse effects. The simultaneous capacity to produce short term (acute toxicity) and long term (carcinogenicity) effects make the risk of using a chemical pesticide difficult to mitigate. Heavy metals and dioxins are well known to cause irreversible effects, therefore they have been added to the prohibited list.

Regarding the system to categorize HHPs, most of the respondents agreed with the proposal. Only a few suggested other ways: having only one category of prohibited pesticides, having two categories (prohibited and restricted) and categorized according to risk.

In the second draft the PPWG keeps this way of categorizing HHPs as it simple to understand and was supported by most stakeholders. Having three categories compared to two support the objective of gradually eliminate the use of the most hazardous HHPs. Based in the experience, the PPWG does not consider feasible to ban all HHPs. As risk is a function of hazard (global) and exposure (local), it is not possible to categorize HHPs at a global level according to risk. It has to be done according to hazard.

3.7 Regulation of the use of HHPs

The Policy identifies 36 active ingredients whose toxicity is so high, that risk cannot be contained even at low exposure. How much do you agree with the prohibition of the use of these HHPs in FSC certified Management Units?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
18%	24%	11%	3%	1%	43%

How much do you agree with allowing the use of a FSC prohibited HHP in case of an emergency situation?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
13%	28%	11%	6%	6%	42%

Can you provide an example of an emergency situation that requires the use of one of these pesticides as the only feasible alternative?

Yes	No	Did not reply
19%	31%	50%

Most of the examples provided did not refer to specific HHPs and when they did, these HHPs were not in the *FSC prohibited HHP list*. Methyl bromide was mentioned in case of a sudden weeds invasion in a nursery.

The PPWG does not contemplate weed invasions as an emergency to allow the use of a FSC prohibited HHP.

Based in the experiences of the PPWG members and the feedback collected, it is not expected to have situations where the use of a FSC prohibited HHP is the only alternative. However, the WG agreed on maintaining this option in draft 2.

How much do you agree with allowing the use of a FSC prohibited HHP in case of a governmental order?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
15%	23%	8%	5%	5%	43%

The WG has agreed on maintaining exceptions for governmental orders in draft 2.

We would like to hear about the potential impacts on forest management practice of prohibiting certain HHPs. Are you aware of the use of Methyl Bromide or other FSC prohibited HHPs in forest operations?

Yes	No	Did not reply
39%	16%	44%

- The FSC prohibited HHPs and purpose of use mentioned were:
 - Chlorthalonil in the pre planting period to prevent fungal growth.
 - Methyl Bromide in nursery operations and to export logs.
 - Thiocloprid for pest control of *Gonipterus* and Bronze bug.

The use of these HHPs has occurred outside of FSC certified operations. As mentioned above, it is not expected that FSC prohibited HHPs are used in FSC certified operations. In draft 2 the list of FSC prohibited HHPs is maintained.

3.8 Environmental and social risk assessment (ESRA)

Do you agree that if the risk can be controlled, the use of some HHPs may be allowed in FSC certified forests under certain conditions?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
34%	14%	1%	3%	5%	43%

How effective are Environmental and Social Risk Assessments, assuming the implementation of associated mitigation measures, in minimizing exposure to HHPs?

Very effective	Effective	Somewhat effective	Not effective at all	Did not reply
20%	19%	10%	4%	47%

Can you suggest other tools that should be considered?

Several stakeholders stated that there are not enough elements in the policy to evaluate the implementation of this tool and therefore suggest others.

The tools suggested are the use of IPM and agroecological approaches, precision silviculture, advanced use of new technologies, historical information and post application evaluations (blood tests/flora and fauna inventories) by ecotoxicologists and toxicologists. Also mentioned more institutional approach (local legislation, monitoring programs) and a set of indicators to be verified and adapted at National level.

To help stakeholders to understand the suggested approach, the PPWG has further elaborated the ESRA framework, incorporating suggestions received in the consultation. Some elements were already included in the policy, for example, ESRA is part of the IPM system, required by FSC. National indicators and thresholds will be developed by the SDG with a baseline provided at the international level.

What do you consider is a good baseline for an efficient and effective Environmental and Social Risk Assessment?

The proposals received were:

- Globally adaptable with common indicators developed by FSC IC.
- Incorporating scale, intensity and risk.
- Hierarchy of control.
- Environmental and social criteria are present.
- Stakeholder consultation is present.
- Use existing national risk assessments, adaptation at local level.
- Use an equation that take in account all the elements and gives a final value.
- Use former derogation justification.
- Refer to FSC Guide to Integrated pest weed and disease management.
- Include training.
- Rely to statistics on accidents or occupational diseases of pesticide applicators.

Taking into account the comments received, the PPWG has further developed the ESRA framework. In the second draft of the policy the PPWG has developed the Annex 2 that includes a minimum list of hazards, exposure elements and exposure variables to take in account when conducting ESRA, providing a baseline for the assessments.

Clause 4.6 states that the Organization shall use the least hazardous pest management alternative available, unless they can prove through ESRA that the risk mitigation measures for a more hazardous alternative are more cost-effective and have equal or greater social and environmental benefits. Do you agree that in some situations the use of a more hazardous alternative might be justifiable if it has a smaller impact compared to a less hazardous pesticide?

Yes	No	Did not reply
41%	9%	49%

Most of the respondents supported this option. However, there were several concerns about the possibility of opening a window for companies to make decision based on the price of the product rather than on the effectivity.

The use of the terms 'benefits' vs the term 'damages' was also questioned.

After discussing the feedback received, the PPWG agreed to eliminate the reference to cost. In draft 2, the use of a FSC highly restricted HHP instead of a FSC restricted HHP allowed when it can be proven through ESRA that it causes less social and environmental damages, is more effective and has equal or greater social and environmental benefits, can be used.

3.9 Alternatives and monitoring

How useful would you consider an online database provided by FSC for information exchange on alternatives and monitoring procedures?

Very useful	Useful	Somewhat useful	No help at all	Did not reply
25%	14%	7%	3%	51%

3.10 Reparation and compensation

Do you know of any organization that has policies and procedures that include compensation for damage to environmental values?

Yes	No	Did not reply
10%	39%	51%

Several respondents mentioned national, supranational or regional legislation that addresses compensation for damage to environmental values. Civil responsibility insurance is also reported.

In particular in Brazil there is an Environmental Compensation Chamber (CCA) within the Ministry of the Environment, which defines where compensation will be made, the amount required as well as evaluates the methodology and procedures for calculating the compensation. In Australia government laws mandate fines for damage to environmental values.

The main suggestions for an effective compensating policy include the ability to make a claim, quick and fair compensation based on lifetime losses, the promotion of ecosystem services in adjacent areas. Respondents also suggest that the amount of compensation needed should be defined at the national/regional level to take in account priorities and strategies of the country or region. They recommend to rely to national institutions that could regulate a fair compensation. A high cost of compensation is suggested as a deterrent for the use of HHPs.

Do you know of any organization that has policies and procedures that include compensation for damage to human health?

Yes	No	Did not reply
11%	36%	53%

Again, national and regional legislation is mentioned as well as insurances. Respondents suggest that certificate holders and service providers (operating on the

FMU) have insurances that in case of incidents/accidents compensate health effects. They point out that a cause-effect link should be determined and the compensation should be related to sick-days, additional damages, degree of occupational inability. A high cost of compensation is suggested as a deterrent for the use of HHPs.

The PPWG addresses these suggestions about compensation of damages to human health and environmental values relying to the FSC Principles and Criteria for Forest Stewardship FSC-STD-01-001 V5-2 EN that states that the Organization shall have mechanisms for resolving grievances and providing fair compensation to local communities and individuals with regard to the impacts of management activities of The Organization.

3.11 Implementation of ESRA

The role of certification bodies and local and regional experts has been strengthened. How much do you agree with this?

I strongly agree	I agree	I neither agree nor disagree	I disagree	I strongly disagree	Did not reply
18%	19%	7%	4%	2%	49%

The main messages from respondents related to this question were:

- Local experts must be knowledgeable and independent to avoid conflict of interests
- Globally adaptable common indicators developed by FSC IC are needed to secure credible and impartial implementation of the policy.
- Concerns related to the capacity of SDGs to deal with additional work, ability to engage appropriate experts, consistency and credibility, etc.
- It may lead to lack of consistency among different countries.

The PPWG proposes in the second draft a framework for ESRA that includes international, national and local control levels. At the international level, FSC provides a minimum list of environmental and social elements and exposure variables to be considered when conducting ESRA, while at national level SDG will develop national indicators and thresholds for use of relevant HHPs in the restricted categories. Countries without SDG shall adopt IGI provided by FSC or use national indicators and thresholds from a country with similar pest problems and forest conditions, upon approval from FSC. In this way is possible to give consistency and credibility to the ESRA and use local expertise at the same time. A guidance template is proposed to make sure that the same elements are taken into account and support certificate holders in the assessment and certification bodies in the assessment of compliance.

How can scale, intensity and risk (SIR) of the forest operation and their pesticides use be taken into account in this Policy?

The respondents answer that often big organizations better manage risks even if they work on big scale because they have a more robust system of control. They state that ESRA should be developed in the national level, considering all scales, risks and intensities.

The PPWG considers that while ESRA must have solid common framework, SIR can help to better tailor the actions needed. This is consistent with the FSC Principle and Criteria, in addition the application of Scale Intensity and Risk (SIR) implies well established responsibilities for the standard developer and forest manager.

Do you support the adaptation of global risk assessment indicators to assess HHP use, as proposed in Annex 3?

Yes	No	Did not reply
32%	14%	53%

The reasons in favor of an adaptation were:

- The toxicity and impacts of substances are the same everywhere, so it is a good starting point.
- Same procedure to IGLs that has proven to be effective.
- There is the need to interpret the global indicators for the local situation. Guidance will be required to ensure the process is applied consistently.
- The interaction between local and global organizations creates a system of check and balances of interest. It will enable all role players to see what other countries are using and doing about HHPs.
- A global assessment is reasonable for the hazard. It is coherent with the policy.

The concerns about an adaptation were:

- It is sensible that requirements can be adapted locally in light of the local context.
- Better to spend resources on the step-wise phase out HHPs and to promote sustainable production.
- Extremely lengthy and complex.

Hazard is global and must be considered in the same way everywhere, but exposure is local. For this reason the PPWG proposes a global framework that describes the relevant aspects of pesticides risk assessment and the development of global indicators for a risk assessment to be subsequently adapted to the national and local circumstances. This framework provides several layers of control to ensure consistency in the implementation.

The PPWG is proposing to follow the process of adaptation applied to the IGI to ensure a balance between chambers and to avoid the incorporation of new mechanisms to the FSC system.

How could the global assessment framework be adapted to local conditions in countries without National Forest Stewardship Standards?

- FSC IC needs to consult local experts for adapting the indicators
- Involve Universities and Institutes of Agriculture and Environment, NGOs, groups of corporate social responsibility and the State
- Use a generic framework made by FSC IC or regional offices
- Ask to national/regional IPM advisory group
- Take as a reference regional initiative or another country with similar characteristics
- It must be incorporated into the International Generic Indicators

The PPWG has addressed in the second draft of the policy the main elements suggested. Indeed in countries without SDG, ESRA will be conducted following a generic framework including IGI. In addition upon approval by FSC, it will be possible to use the national indicators and locally relevant thresholds for risk management from a country with similar pest problems and forest conditions.

Do you foresee major costs when implementing this Policy?

Yes	No	Did not reply
35%	7%	58%

If so, what major costs do you foresee that may be a challenge for the implementation of the Policy?

Adaptation of ESRA by SDGs	Implementation of ESRA by Organizations	Increased auditing costs	Other	Did not reply
26%	26%	23%	5%	62%

If you have selected "other", please explain

Several respondents commented that it's difficult to estimate cost since the requirements for ESRA and monitoring and reporting are not defined.

In a global comparison the increase in costs is relatively minor, however depending on the case the impact could become significant.

The implementation of the new Policy will result in increased global challenges in combining information sources, monitoring capabilities, results interpretation, etc., especially for smallholders.

Once set up operation of the policy it should be cheaper and more effective than the current system.

The PPWG recognizes the difficulty to evaluate the costs without explanatory elements, therefore it has prepared a framework to help understand the steps to follow. In the intention of the PPWG this proposal should reduce the burden and costs of the current derogation system, eliminate the centralized decision making and allow local flexibility within a homogeneous framework.

Although the adaptation of the international indicators will result in additional work for standard development groups, it is expected that in the long term implementation of the revised policy is less bureaucratic and less costly than the current derogation system.

What are your main concerns about this Policy?

High costs	Complexity	Credibility	There is no significant impact on environmental and human health	Other	Did not reply
15%	13%	13%	7%	16%	60%

The main concerns reported by respondents are about implementation, local adaptation, effort required and lack of details of the ESRA procedure. The complete phase out of pesticides is a common concern as well. In addition a consistent approach of all CB's is worrying some of the participants to the consultation.

The PPWG has taken in account the concerns and has gone from the principles of the policy to some of the details of the future implementation, developing the ESRA framework and the Annex 2, which provides a minimum list of hazards, elements and variables to consider in the assessment of environmental and social risks. In addition

a template is proposed to be used as a guidance document. The template has been designed to support organizations to conduct site relevant ESRA considering the normative elements and to certification bodies to streamline the assessment of ESRA.

How could we address your concerns?

The most common suggestions include better explaining ESRA and how it can be implemented, providing guidance and communicating better how it works and the impact expected. The respondents would appreciate the share best practices and practical examples non-chemical methods of control in action. They invite FSC to make sure that organizations realize that risk assessments are not just a "paper exercise", but must be thoroughly conducted and adhered to. The option of conducting ESRA at a national level and not individually by each CH is also suggested.

The PPWG has addressed these concerns developing the ESRA framework, explaining the procedures to follow and providing a guidance template for ESRA at the management unit level. The group strongly pointed out which is the baseline or the minimum requirements in order to prevent it from being a paper exercise. Certification bodies will assess that ESRA has been conducted according to the described requirements and that the organizations comply with the applicable international/national indicators. A database with shared experiences and methodology is already in place. About the option of ESRA being implemented nationally, it could only work if similar cultures, climate, soil, orography, pests and pesticides proposed are similar.

3.12 Addendum. FSC lists of highly hazardous pesticides

We have changed the format of the list to show more clearly what the basis for inclusion of each active ingredient is in the corresponding FSC list of highly hazardous pesticides. Do you find the new format more user friendly and easier to understand?

To a great extent	Somewhat	Very little	Not at all	Did not reply
21%	24%	2%	0%	53%