

**FAQ**

**SECOND DRAFT OF THE INTERNATIONAL GENERIC INDICATORS FOR THE USE OF HIGHLY HAZARDOUS PESTICIDES (HHPs IGIs)**

25 MAR 2021, 18:00 – 19:00 CET WEBINAR 1 (EN)  
 30 MAR 2021, 10:00 – 11:00 CET WEBINAR 2 (EN)  
 06 APR 2021, 16:00 – 17:00 CET WEBINAR 3 (ES)

*Please note the following content is a collective FAQ from the 3 Webinars with responses from FSC staff and the Technical Working Group (TWG) members present on the call. TWG and the project team are still discussing or refining a number of questions that have been submitted during the webinar which will be also considered for the final draft. The TWG welcomes your further input on any of these issues via the public consultation platform [here](#).*

**TOPIC 1) Biomonitoring**

FAQ 1	
Question	<b>Is biomonitoring still required when it can be demonstrated that workers are not exposed to pesticides?</b>
Answer	Yes, it is still required to have a baseline biomonitoring test data that they are not exposed to the pesticides. Therefore, the workers have to conduct at least one biomonitoring test to prove whether either exposed or are not exposed. This test will also give the limit of exposure currently or existing body burden against which future tests can be compared.

FAQ 2	
Question	<b>The proposed biomonitoring tests may not be possible to carried out in some countries and SLIMF (Small and Low Intensity Managed Forests) due to finance and accessibility reasons. Have Technical Working Group (TWG) discussed about this?</b>
Answer	Yes. In such situation, you can implement to Environmental and Social Risk Assessments (ESRA) framework to look at before you have to do the biomonitoring to see whether you can use hierarchies of control in the Code of Conduct of pesticides management to see if you can't eliminate or substitute the pesticide and then do a proper ESRA and find out what your mitigation measures are then to see how to accomplish your goals with regards to your forest management without having to utilise HHP's frequently where you would need to conduct the biomonitoring based on the frequency and duration of the pesticides used.



FAQ 3	
Question	<b>When a forest company hires contractors (licensed applicators), who work for other companies, how is biomonitoring accomplished?</b>
Answer	If you have a contractor or hired a company for spraying, they would need to have a schedule where they can keep their hours so that you can see that they are not reaching their thresholds of body burden of spray hours.

FAQ 4	
Question	<b>Can workers refuse to take biomonitoring test?</b>
Answer	Yes. International Labour Organization (ILO) workers' rights covers this so the workers can refuse. This is some issue that can be handled in the national standard. It is possible to further elaborate it into international level.

FAQ 5	
Question	<b>What factors determine when a worker should be included for biomonitoring?</b>
Answer	The determining factors are frequency and duration (please see Appendix 1): The number of hours the worker is spraying, when they reached the acute reference dose, when they exceed the acceptable daily intake and when the workers are exceeding the threshold level, they would have to be tested as this is when the body burden if the pesticide starts exceeding the threshold levels and damage starts occurring that can be irreversible.

FAQ 6	
Question	<b>When more than 1 test is suggested for the biomonitoring in the Appendix 1 of the HHPs IGIs, are all tests are required or only one?</b>
Answer	It depends. You need to check whether the same test is needed to test the body load of the pesticides. If the case if the same test has to be done, you wouldn't need to conduct the test twice. For example, paraquat falls under Hazard Criterion 1 and 2 and it would need blood test once which can cover both of the Hazard Criterion.



FAQ 7	
Question	<b>Will biomonitoring be required for small holders? Or will the local SDG be able to apply scale / intensity / risk in the adoption / adaption process?</b>
Answer	Frequency and duration are the key for the biomonitoring. Therefore, if the acute reference does (ARfD) of the pesticide is exceeded, then you are required to conduct the biomonitoring.

FAQ 8	
Question	<b>Regardless of the frequency of spraying and ESRA, do the HHPs IGIs determine the mandatory nature of medical biomonitoring? Or can ESRA point out that biomonitoring is not necessary?</b>
Answer	<p><u>Country level ESRA:</u> There are two scenarios for country level ESRA (setting the indicators to a particular pesticide in the national FSC standard):</p> <ul style="list-style-type: none"> <li>a) In countries, where chamber balanced standard development group (SDG) does not exist, the IGIs are used in the Interim National Standard (INS) without adaptation and they do determine the mandatory nature of medical biomonitoring. Only exception for this is a situation, where a SDG has developed indicators to that particular pesticide in a neighboring country having similar conditions: in that case, those indicators may be used in the INS</li> <li>b) In countries, where chamber balanced standard development group (SDG) does exist, the SDGs use the IGIs as a starting point for developing the national indicators to the target pesticide in National Forest Stewardship Standard (NFSS). If well justified, the national indicators may differ from IGIs.</li> </ul> <p>In both cases, the national indicators must show compliance with the IGI Appendix 1 and they also have to show which level of exposure to the Highly Hazardous Pesticides will trigger the mandatory medical biomonitoring. Pesticides, which are not classified as highly hazardous, may not need biomonitoring. Also, when the use of the HHP remains below the trigger value, biomonitoring is not needed.</p> <p><u>ESRA conducted by certificate holder:</u> In case that spraying, or “the frequency of fumigation” does not exceed the trigger level of exposure or threshold level indicated in INS or NFSS, medical biomonitoring is not required</p>



FAQ 9	
Question	<b>What is expected regarding monitoring (medical and environmental) for non-HHP pesticides?</b>
Answer	<p>This is dependent on the type of national standards:</p> <ul style="list-style-type: none"><li>• INS countries: In countries, which are dependent on Interim National Standards the monitoring of the target pesticide shall comply with FSC-POL-30-001 Pesticides Policy and particularly paragraphs 4.12; 6.1 and Annex 2</li><li>• Countries having NFSS: The national indicators for monitoring (medical and environmental) for non-HHP pesticides may be adapted for each target pesticide, in line with FSC-POL-30-001 Pesticides Policy</li></ul> <p>In all cases, The Organization shall maintain records of chemical pesticide usage (FSC-POL-30-001, paragraph 6.1), including:</p> <ul style="list-style-type: none"><li>• Trade name,</li><li>• Active ingredient,</li><li>• Quantity of active ingredient used,</li><li>• Period of use,</li><li>• Number and frequency of applications,</li><li>• Location and area of use and</li><li>• Reason for use.</li></ul> <p>Monitoring measures to minimize the risks (FSC-POL-30-001, Clause 4.12.2) should cover the (i) medical and environmental exposure elements considered as risk in the Environmental and Social Risk Assessment and (ii) the corresponding mitigation strategies defined to minimize risk (see also: FSC-POL-30-001, Annex 2, ESRA template).</p> <p>Also, medical and environmental risks indicated in chemical labels, or user's instructions of the target pesticide, should be monitored.</p> <p>The frequency and duration of any pesticide used is the key to if and when biomonitoring is needed, and records should be kept to ensure that the thresholds are not exceeded (the body burden).</p>



FAQ 10	
Question	<b>In Appendix 1, it is mentioning the least expensive and most accessible tests but was this analysis also including Latin America and Global South? It will be very challenging to those regions.</b>
Answer	There are a couple of countries mentioned in the Synopsis report, reviewing on which countries have biomonitoring and which not. However, in case of the countries without biomonitoring, you can find more additional information in the World Health Organization guidance document which is referenced in the Synopsis report. Biomonitoring 2015 Facts and Figures document does have additional information about the countries that are currently doing biomonitoring in Latin America.

FAQ 11	
Question	<b>Why is there no specific indicator regarding ESRA in HHPs IGIs? Do I have to go through biomonitoring no matter the ESRA result?</b>
Answer	The ESRA is the central tool to the Pesticides Policy and an integral part of IPM. Biomonitoring comes in when HHP's are used and then the frequency and duration of the spraying of these HHP's. The longer and more frequently you spray these pesticides, the more likely you will get in reaching the body burden/threshold of the HHP and then biomonitoring will be needed. If the threshold is exceeded, damage is done to human health that can be irreversible in the case of EDC's, tetratoxics, mutagenics and reproductive toxicants. Biomonitoring is done to pick up any signs of reaching the thresholds and being able to mitigate any adverse affects before they can happen.

**TOPIC 2) General**

FAQ 12	
Question	<b>How much SDGs will be able to adapt the HHPs IGIs to the National Standards?</b>
Answer	IGIs are the starting point for developing the national indicators. There are three options as the existing IGIs. You may adopt, adapt or drop. It is even possible to develop a new indicator in the national context as well. Justification source for adapting can be existing/ or past derogation decisions since there are always conditions provided to each HHP for each country and you may pick up elements from those derogation decisions.

FAQ 13	
Question	<b>How the HHPs IGIs will be applied to the existing NFSS?</b>
Answer	If you limit necessary the use of HHPs in your country, you have to develop a set of indicators to the national standard. So, it will be a partial revision of the national standard or you may also incorporate to in the regular 5 years cycle of reviewing and revising the standard. Once you have identified the HHPs that is needed in your country, you will develop specific national indicators, using the HHPs IGIs as a starting point which you can adopt, adapt, or drop and if necessary, add new indicators.

FAQ 14	
Question	<b>Is there a statement mentioning that companies need to have Free, Prior and Informed Consent (FPIC) from indigenous people before using any HHPs even after ESRA?</b>
Answer	The HHPs IGIs indicators will be used in the context of the whole national standards. We have Principle 3 and Principle 7 for forest management planning and working with indigenous people and its requirement that before any forest management activity takes place, that may affect indigenous people, there has to be FPIC applied. Therefore, we consider FPIC requirement is already built to the FSC standard already and it is not necessary to repeat in HHPs IGIs.

FAQ 15	
Question	<b>What is the definition of 'government order'?</b>
Answer	It is defined in the Pesticides Policy.  Governmental order: the use of a <b>specific</b> chemical pesticide is ordered or carried out by governmental authorities independent of the Organization. (Source: FSC-POL-30-001 V3-0 <i>FSC Pesticides Policy</i> ).



FAQ 16	
Question	<b>How the HHPs IGIs will impact the certification process in countries where standards based on Principle &amp; Criteria V4 are still in use?</b>
Answer	In the case of countries with Certification Body (CB) standards or interim national standards, the Pesticides Policy says that the HHPs IGIs will have to be adopted directly as they are written. Therefore, at some point this HHPs IGIs will be adopted to CB standards and interim national standards only after that the HHPs may be used in those countries.

FAQ 17	
Question	<b>Is there any training planned for CBs/auditors/interested stakeholders on Pesticides Policy and HHPs IGIs?</b>
Answer	Yes. Once the final draft of HHPs IGIs is published, PSU is planning to conduct a series of training.

FAQ 18	
Question	<b>Do CBs/auditors are going require ESRA during audits?</b>
Answer	Yes. In that respect, the Pesticides Policy is now fully implemented. ESRA is required for the use of chemical pesticides & HHPs on certification holder level.

FAQ 19	
Question	<b>What is the scope of ESRA in environmental term? What will be required to be check in the field, and what is the scope?</b>
Answer	It depends on the frequency and duration of the spraying because the more you spray the higher the risk on the environment. Therefore, the higher the frequency and duration of the spraying, the higher the predicted environmental exposure (PECs) and Toxicity Exposure ratio (TERs) will be with regards to the environmental risk assessment. This is the reason why we included both the tropical and temperate trigger values to assist you when you work out the PEC's and TER's for the pesticide to compare to.