A. General Requirements

| Application Submission date: | SCS Global Services  
2000 Powell St., Suite 600 | Emeryville, CA 94608 USA  
tel: 510.452.8049 | fax: (510) 452 6882  
bgrady@scsglobalservices.com  
www.SCSglobalservices.com |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name, and contact details of certification body requesting a temporary derogation:</td>
<td>Amitrol</td>
</tr>
</tbody>
</table>
| Active ingredient for which a derogation is being requested: | Nufarm Amitrole T Herbicide  
Active Constituents: 250 g/L Amitrol 220 g/L Ammonium Thiocyanate  
(Group Q Herbicide) |
| Trade name and formulation type of the pesticide: | Ground based application utilizing various vehicles, fitted with boom sprayers using large droplet size. |
| Method of application and application equipment: | Used to control grasses and broad-leaved weeds in plantations. |
| Common and scientific name of the pest species: | For the control of grasses and broad leaved weeds in Eucalypt plantation areas in the south west of Western Australia. These plantations exist on freehold or under a lease arrangement. |
| Name and FSC certification codes of certificate holders requesting a temporary derogation: | Amitrole is only applied in the first winter following planting in what is called the second year weed control. It is used because it can be applied as an inter-row operation and if it makes contact with the foliage of the Eucalypt trees it will not kill them or cause scorching. It enables an area adjacent to the trees to remain free from competing vegetation as well as reducing grass that could act as a fuel source during the summer fire season. It can also act to eliminate weed growth prior to infill/replant operations. |
| Scope for which a temporary derogation is being requested: | Within an established plantation, Amitrole is regarded as the best cost effective available knockdown specific herbicide to control grass and broadleaved weeds. On average we treat just over 1% of the FMU. |
| 1. Demonstrated need: Explain how the proposed use complies with the criteria for need, including consideration of non highly hazardous alternatives and preventative silvicultural measures. |

NB: MSDS are available from http://www.msds.com.au for which WAPRES has a subscription.
The potential value of damage for not using Amitrole is compounded by low plantation stocking in the first year or existing deficiencies in growth. Reduced yields from growth impairment and the effect on management costs will affect the plantations profitability in the long term. There could be flow on affects including value of lease payments for additional rotation time, cash flow disruptions, wood flows, shipping, long term contractual obligations, and the value of lost earnings not only for the company but also for suppliers and contractors.

Alternatives such as Clopyralid and Haloxyfop could be used as substitutes but are expensive and can have varied results if weed size is too extensive. Glyphosate can also be used but only on sites with even rows and uniform weed growth. Smaller trees can be killed by glyphosate.

Without the use of Amitrole weed control would require a number of follow up sprays to ensure a range of weeds are controlled. Alternatives such as Clopyralid and Haloxyfop are significantly more expensive than Amitrole. The financial viability of planation management would be jeopardized if the derogation for Amitrole is rejected before a suitable, affordable alternative is found.

### 2. Stakeholder consultation

In Australia all chemical products must be registered for use by the Australian Pesticides and Veterinary Medicines Authority. The registration process is explained in this document [http://www.apvma.gov.au/publications/fact_sheets/docs/registration_process.pdf](http://www.apvma.gov.au/publications/fact_sheets/docs/registration_process.pdf) and includes review by experts and public consultation.

Use of amitrole in certified plantations in Australia has FSC Pesticide Derogation Approval until 1 February 2016. This has involved previous stakeholder consideration and input for the same operational area.

A request will be made to FSC Australia to place on their website for further stakeholder comment. WAPRES will also place a copy of the derogation request on its website.

WAPRES is committed to stakeholder engagement and maintaining good relationships with all our neighbours in all our business operations.

Where WAPRES has identified adjoining land uses that are sensitive to chemical applications we will ensure they are:

- Aware of the planned activities
- Have the opportunity to comment on the spray plan
- Can take any necessary precautions

All spraying operations will be managed according to a specific Plantation Management Plan for the plantation and a Spraying Prescription for each operation. Spray records will be completed for each operation and a copy kept by WAPRES.

### B. Forest Management Enterprise Specific Requirements

<table>
<thead>
<tr>
<th>Forest Management Enterprise:</th>
</tr>
</thead>
<tbody>
<tr>
<td>FSC Certificate Registration Code:</td>
</tr>
<tr>
<td>Location /region:</td>
</tr>
</tbody>
</table>
1. **Specified controls to prevent, minimize and mitigate hazards:**
   
   Australia has a national registration system for the registration of all agricultural and veterinary chemical products into the Australian marketplace. The Australian Pesticides & Veterinary Medicines Authority (APVMA) is the body responsible for registration of these products ([www.apvma.gov.au](http://www.apvma.gov.au)).

   Only licensed contractors apply Amitrole. Contractors ensure that safety measures detailed in the MSDS sheet are adhered to. Sensitive areas are avoided when spraying, including any areas of remnant vegetation on the property or any watercourses with consideration given regarding neighbouring land use. Prescriptions are matched to individual sites to prevent any off site movement into waterways or areas of significance. Contractors apply chemicals according to the manufacturer’s specifications and timing, and apply rates that will not result in the creation of resistant strains of weeds. Spraying is only conducted under appropriate weather conditions, taking into consideration wind direction and speed, relative humidity and temperature.

   Water sampling/testing is conducted annually on a number of plantations for which herbicide spraying is likely and there is the potential for contamination of water bodies.

   WAPRES policies, procedures and management strategies ensure hazards of associated operations are minimized and include:
   - Detailed Plantation Management Plans
   - Detailed individual spray prescriptions.
   - Detailed Operational Maps detailing water bodies, HCVs, residences.
   - Internal procedures for all spray applications.
   - WAPRES employs a dedicated OHS and Environmental officer to assist operations staff.
   - Daily spray records documented and recorded
   - Chemical usage is documented and recorded

2. **Program to identify alternatives to a ‘highly hazardous’ pesticide including preventative silvicultural measures.** Describe the programs that are in place to identify alternatives, include a timetable and indicate research partners and targets.

   WAPRES contributes to the “Australian Plantation Forest Industry Herbicide Research Consortium” run through the Australian Forest Product’s Association. This group tests a host of herbicide products, with one of its primary goals to explore new and potential residual herbicides in conjunction with the plantation industry and chemical manufacturers.

   At this time there have not been any alternative products identified as a substitute to Amitrole.