



Purpose and Scope

The use of pesticides (herbicides, insecticides, fungicides, etc), is at times necessary to meet forest management and legislative commitments such as preventing significant growth loss, preventing tree mortality or preventing the spread of noxious or restricted weeds. Treatments involving pesticides will only be undertaken after careful consideration of alternative strategies and will be conducted with caution, respect and awareness of potential impacts to the environment. When pesticides are required, they must be used in a safe, environmentally responsible manner.

The purpose of this document is to outline the procedures and responsibilities for DMI staff supervising pesticide applications to ensure that applications within the scope of the DMI EMS:

1. Meet health and safety requirements,
2. Meet legislative requirements,
3. Minimize impacts on wildlife, fisheries and forest resources,
4. Do not pollute soils, surface water, and groundwater,
5. Minimize the potential for off target applications.

These procedures apply to Pesticide applications conducted:

- For Forest Management,
- On road right of ways (ROW),
- For Short Rotation Intensive Culture Tree Crops and Tree Improvement Test Sites.

Details

1. Requirements for Applications

Forest Management and ROWs

To conduct pesticide applications for hire or reward, for forest management or on campgrounds, parks, or right of ways, a service registration is required. DMI does not hold the required service registration. As a result, a qualified contractor will be utilized. The qualifications of a contractor to apply pesticides for forest management and ROW's are defined as:

- a) meeting legislative requirements for holding a Pesticide Service Registration and
- b) holding the appropriate Class of Pesticide Applicator Certificate.

Short Rotation Intensive Culture (SRIC) Tree Crops & Tree Improvement Test Sites

Growing trees for fibre production on agriculture land and progeny test sites are **not** considered **forest management**¹. SRIC tree crops have been recognized as an agronomic crop and as such, fall under a different category of legislation. Growing trees under these circumstances qualifies the grower to be considered a commercial agriculturalist. There is no need for a service registration or for the applications to be conducted under a certified applicator as long as the application occurs on land that he owns. In the interest of corporate stewardship and accountability to the public, pesticide applications will be

¹ Consultation with the Pesticide Coordinator of Alberta Environment has confirmed that trees grown on agricultural land for fibre production and progeny test sites are not forest management and doing so qualifies one as a commercial agriculturalist. In addition further confirmation exists with the recent (2006), approval of the User Requested Minor Use Label Expansion for Lontrel 360® (an agricultural herbicide), for use in *Populus spp.* plantations and their hybrids.





conducted under the supervision of a certified pesticide applicator even though it is not a legal requirement.

2. Role of the Certified Applicator

A certified applicator has passed an exam that has tested their knowledge of pesticide application concerns (principles, practices and legislative requirements). They are bound by the legislation to comply with the Code of Practice for Pesticides. The code addresses issues with regards to record keeping (application, and training records), assistant training and supervision, storage and handling, appropriate emergency response equipment, application restrictions around open bodies of water, disposal of pesticides as well as other concerns.

3. Research

DMI will support research to:

- Improve Silvicultural Practices (cultural, biological and mechanical vegetation control methods).
- Enhance tree growth and insect and disease resistance through tree improvement activities.
- Promote User Request Minor Use Label Expansions.

4. Pest Monitoring Program

DMI will maintain a proactive Weed Control Plan that focuses on preventing spread of weeds through:

- Monitoring weed location/population
- Cleaning equipment
- Developing a priority rating for control activities

5. Applications

- Applications will be conducted under the supervision of a **Certified Pesticide Applicator**:

1. All staff involved with pesticide applications must be trained.
 2. A thorough understanding of health and safety issues, environmental impacts, product characteristics, recommendations and restrictions for use will be stressed.
- Only registered, approved pesticide products will be used.
 - All applicable legislative standards and guidelines for the storage, handling, use and application of pesticides must be strictly followed under all circumstances.
 - Applications will only be undertaken after the appropriate approvals have been obtained.

6. Emergency Preparedness and Response, Safety & Public Concerns

- All staff involved with pesticide application operations will review and implement the company's Emergency Preparedness and Response Plan for spills and emergencies as necessary.
- A copy of the current EPRP will be available at the site during these activities.
- All Incidents will be reported in accordance with FR-G013 Incident Accident Reporting.
- The safety of the public, staff, wildlife and the environment will be the overriding priority.
- Any pesticide use decisions must duly consider the concerns of adjacent property owners and nearby neighbours.



7. Record Keeping

- Prior to entering into a contract, DMI will verify and keep record of the following information:
 1. Pesticide Service Registration
 2. Proof of Required Insurance(s)
 3. Employs the Appropriate Class of Certified Pesticide Applicator

- DMI will conduct periodic inspections of the active operations to ensure that legislative requirements are met:
 1. Appropriate training (training records)
 2. Storage facilities and Mixing and loading sites meet regulations
 3. Appropriate PPE is being used.
 4. Appropriate Emergency Response equipment is onsite and available

- Training Records for applicator assistants will be maintained.
- During and following any pesticide use, accurate records must be completed.

REVISION HISTORY

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APPROVAL:

Approved:	S.ELKINS	EMS Coordinator – Forest Resources
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Overview of general pesticide requirements by land type (March 17, 2006)

Land Status	Zone	Application type	Pesticide service registration ¹	Code of practice for pesticides ²	Other requirements	Suggestions for additional EMS commitments
Public	Green	Operations – Forest Management & SRIC Tree Crops	Required	Required	-Follow “Guidelines for the Use of Herbicides for Silviculture in Alberta”. -submit project proposals to ASRD. -EPEA, PMR, PSHUAR	None
Public	White	Operations – SRIC Tree Crops	Not required	Required	Certified applicator, follow label, EPEA, PMR, & PSHUAR requirements.	None.
DMI private	N.A	Operations – SRIC Tree Crops	Not required	Not required	Certified applicator ³ , follow label, EPEA, PMR, & PSHUAR requirements.	Use certified applicator and follow CPP regardless of interpretation of “agricultural production”.
Other private	N.A.	Operations – SRIC Tree Crops	Required	Required	Certified applicator, follow label, EPEA, PMR, & PSHUAR requirements.	Applications conducted for ‘hire or reward’ require service registration.
ALL	ALL	Research ⁴	Not required	Not required	EPEA provisions for pesticides and hazardous substances, PMR section 9 (30 m of OBW), PSHUAR sections 2 (other laws) and 5 (no adverse effects).	None

EPEA – Environmental Protection and Enhancement Act

PMR – Pesticide Ministerial Regulation

OBW – open body of water

CPP – Code of Practices for Pesticides

ASRD – Alberta Sustainable Resource Development

PSHUAR – Pesticide Sales, Handling, Use, and Application Regulation





Notes:

1- **Pesticide Service Registration** - A service registration is needed to apply pesticides on public land or for hire or reward:

'Public land' does not include government owned land that is leased for grazing or agriculture purposes as indicated in PSHUAR Sec.1 (tt). If an agricultural lease is granted for SRIC tree crops on public land, potentially, a service registration would not be needed whether or not the land fell in the green or white zone. However, DMI may, as a lease requirement, have to meet some criteria defined by the government as part of the lease agreement (i.e. applicator certification and/or service registration).

A Pesticide Service Registration is required for public land in the Green Zone based on the following sequence of definitions: The Pesticide Ministerial Regulation (PMR) Sec. 7 – pesticide service registration is required to use or apply a pesticide for “forest management”. The PMR defines “forest management” as “the management of a forest for wood, fibre, wildlife, or recreation.” The Pesticide Sales, Handling, Use, and Application Regulation (PSHUAR) defines “forest” as “an area that is in forest cover in the Green Area”. Definitions from the PSHUAR also apply to the PMR (PMR Sec. 1(2)).

The requirement for pesticide service registration also requires that the “Code of Practices for Pesticides” (CPP) be followed (Section 83.1 of the Environmental Protection and Enhancement Act). The CPP (Section 11.2) specifies that a project proposal must be submitted to Alberta Sustainable Resource Development (ASRD) for any application of pesticides in a “forest” (forest cover in the Green Area) and that proposals for herbicide applications be in accordance with “Guidelines for Use of Herbicides for Silviculture in Alberta”.

2- **Code of Practices for Pesticides** – Must be followed by all applicators (Section 10 of the PSHUAR).

The parts of the Code of Practices that are clearly directed at public lands in the Green Area (project proposals to ASRD) or linked to other documents that are directed at public lands (Guidelines for the Use of Herbicides for Silviculture in Alberta) apply only to applications in a “forest” (public land in the green zone).

3- **Agricultural production on private land** – There is an exemption from the requirement for an applicator certificate for “a commercial agriculturalist using or applying pesticides on land he owns”.

There are definitions included in the PSHUAR for “commercial agriculturalist” and “agricultural production”. Growing trees for fibre production does qualify and as such also removes the requirement for following the CPP since in this case it flows from the requirement for an applicator certificate.

4- **Research or Testing** – “...evaluation of a pesticide to support a new label use or application rate, or to modify an existing label use” (PSHUAR).

Under section 3 of the Pesticide Sales, Handling, Use and Application Regulation (PSHUAR) researchers are exempted from many of the requirements of the PSHUAR and the Pesticide (Ministerial) Regulation (PMR) including requirements for Pesticide Service Registration and applicator certificates and also from section 163 of the EPEA which requires application in accordance with the label and the regulation.