

Revised long-term off-label arrangements for pesticides

by Ian Willoughby, Forestry Authority, Alice Holt Research Station, Farnham, Surrey

My previous article (*FBT* February p23) outlined the products that have approval from the Pesticides Safety Directorate for use in forestry and farm woodland. This describes the long-term, off-label arrangements for pesticides, and briefly discusses their practical implications.

In addition to the two main types of approval, namely full-on label and specific off-label approval, certain fields of use may be covered by the long-term off-label arrangements. This approvals process has been subject to review, but revised arrangements have now been put into effect, and are valid until December 31 1999.

The long-term arrangements confer off-label approval to certain fields of use, rather than to specific products. The same basic principles as specific off-label approvals apply, namely users must comply with all label conditions of use as well as additional off-label restrictions, and all applications are made at the users' own risk.

Fields of use

The following extensions of use are permitted under the new arrangements.

- All pesticides will full or provisional label approval for use on any growing crop may be used within forest nurseries, on crops prior to planting out.
- Christmas trees grown on commercial agricultural and horticultural holdings and in forest nurseries can be regarded as hardy ornamental or forest nursery stock, and are covered by the same arrangements as forest nurseries.
- Herbicides with full or provisional label approval for use on cereals, may be used in the first 5 years of establishment of new farm woodlands (including short rotation energy coppice), on land previously under arable cultivation or improved grassland (as defined in the Woodland Grant Scheme).
- Herbicides with full or provisional label approval for use on cereals, oilseed rape, sugar beet, potatoes, peas and beans, may be used in the first year of re-growth following cutting in short rotation energy

coppice, on land previously under arable cultivation or improved grassland (as defined in the Woodland Grant Scheme).

Conditions of use

As well as the usual good working practices required for users, the following additional conditions **MUST** be complied with, when applying pesticides under the long term off-label arrangements.

- All precautions and statutory conditions of use, which are identified on the product label, must be observed.
- The method of application used must be the same as that listed on the product label, and comply with relevant codes of practice and requirements under COSHH.
- All reasonable precautions must be taken to safeguard wildlife and the environment.
- Products must not be used in or near water unless the label specifically permits this.
- Aerial applications are not permitted
- Products approved for use under protection i.e. under polythene tunnels or glasshouses, cannot be used outside.
- Rodenticides and other vertebrate control agents are not included in these arrangements.
- Use is not permitted on land not intended for cropping, for example paths, roads, around buildings, wild mountainous areas, nature reserves etc.
- Pesticides classified as hazardous to bees must not be applied when crops or weeds are flowering.
- These extensions of use apply only

to label recommendations - no extrapolations are permitted from specific off-label approvals.

- Unless specifically permitted on the product label, hand-held applications are **not** permitted if the product label: prohibits hand-held use, requires the use of personal protective clothing when using the pesticide at recommended volume rates and is classified as 'corrosive', 'very toxic', 'toxic', or has a 'risk of serious damage to eyes'.

If none of the above apply, hand-held application is permitted provided that: the concentration of the spray volume does not exceed the maximum recommended on the label; spray quality is at least as coarse as the British Crop Protection Council medium or coarse spray (refer to the provisional code of practice for the use of pesticides in forestry, Forestry Commission Occasional Paper 21); operators wear a protective overall, boots and gloves for applications below waist height. In addition a face shield should be worn for applications above waist height, if the product label gives a buffer zone for vehicle-mounted use, a buffer zone of 2m should be used for hand-held applications.

Practical implications

As described in my previous article, the Forestry Commission has made a number of specific off-label applications for herbicides to be used in the establishment of new farm woodlands on arable or improved grassland. These products have been subject to small scale trials, and are the only ones in addition to existing approved products, that the Forestry Commission would recommend or be able to offer guidance on.

The revised long-term off-label arrangements do not extend approval to any of these additional products that specific off-label approval has been sought for. However, the revised arrangements may allow the use of some products in farm woodlands that users are already familiar with from other crop situations, at their own risk. The Forestry Commission will not be able to give advice on their likely effect on trees.

On the other hand, the revised arrangements do allow the use of some additional products in short rotation coppice that have been subject to Forestry Commission trials. Detailed guidance will be provided in a revised version of Forestry Commission Research Information Note 201, which is expected to be published in 1995.

The revised arrangements bring no major change to the arrangements for nursery

herbicide and Christmas tree situations, but users should note the revised conditions of use.

Further guidance

Pesticide users are advised to obtain copies of the new arrangements from the Pesticides Safety Directorate, Mallard House, Kingspool, 3 Peasholme Green, York YO1 2PX.

Farm Woodlands and Short rotation Coppice

Forestry Commission Field Book 8 - *The Use of Herbicides in the Forest* (revised edition due for publication in March/April).

Nursery Herbicides

Williamson, D.R., Mason, W.L., Morgan, J.L., Clay, D.V., Forestry Commission Technical Paper 3 *Forest Nursery Herbicides*, 1994.

General

The UK Pesticide Guide 1994. CAB

International/ British Crop Protection Council, ISBN 0851988946.

This annual publication contains a complete list of UK approved products and their relevant fields of use. This may enable users to determine if products they are familiar with can be used in other situations, under the long term off-label arrangements.

Forestry Commission Occasional Paper 21 *Provisional code of practice for the use of pesticides in forestry*, 1989.

Chips 1000 pallets an hour

Irvine, Ayrshire is the site for the installation of Europe's first waste-wood shredder from American West Salem Manufacturing (WSM) of Oregon. Costing £100 000 and capable of shredding up to 1000 pallets an hour, it will make Shewalton Recycling one of the largest recycling plants in Scotland.

With stringent environmental controls preventing the burning of wood waste, many companies have to find other ways of disposing of unwanted or broken pallets and crates. This alternative was supplied by Woodtech Machinery Ltd of Newbury, Berkshire (Lindner Recycling Division), sole agents for the US company.

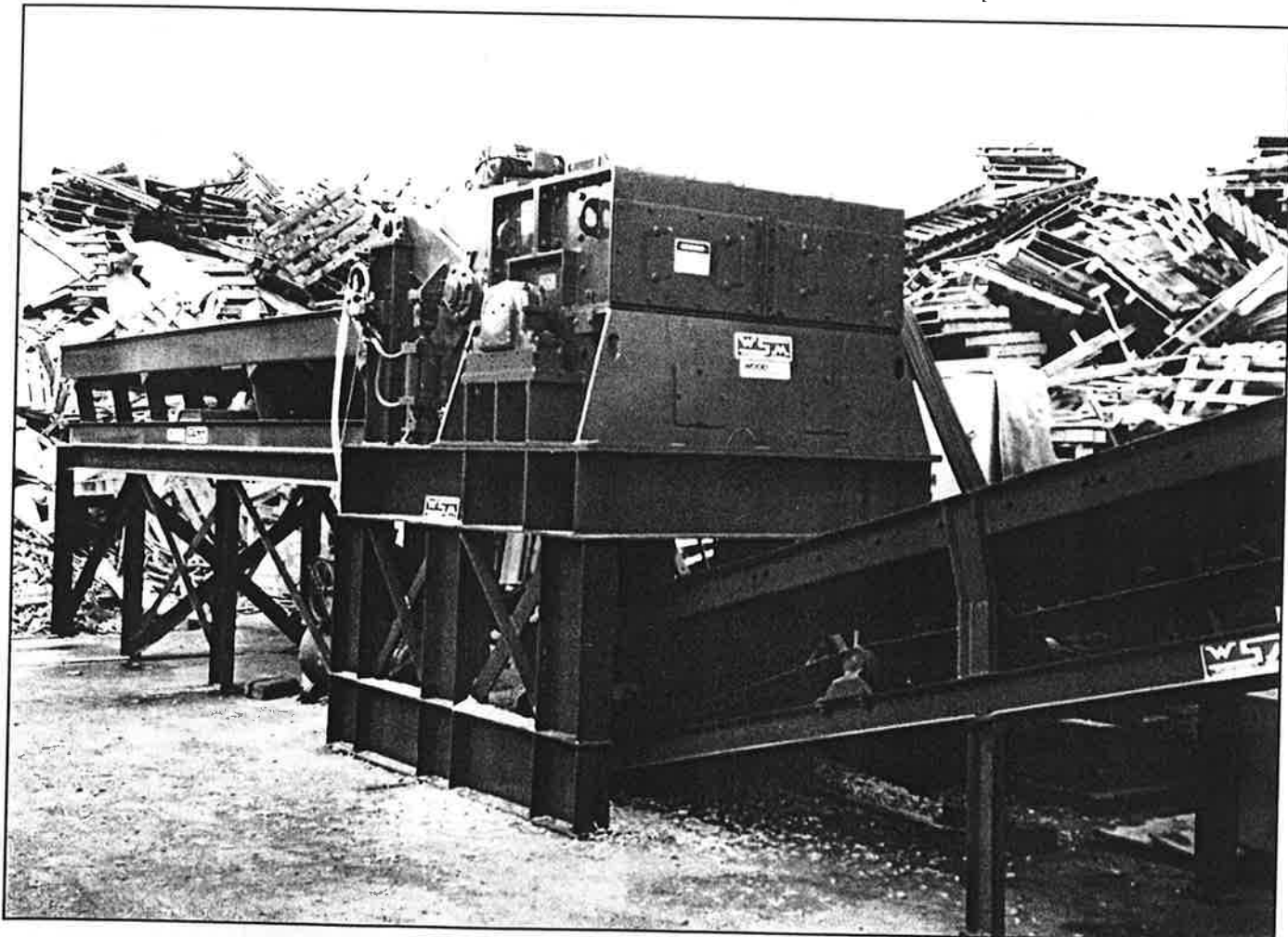
In full production, the WSM shredder will offer a 24-hour delivery service throughout the west of Scotland. Shewalton collect the waste material from throughout this region, including bark from the local Caledonian Paper mill.

The latter is turned into chips for Caber-board (which demands 25% recycled wood for its product) and other woodchip consumers. Some of the waste wood is turned into sawdust for horse circuits and also for top dressing for landscaping and as an alternative fuel source for factory heating systems. Pallets are obtained from local manufacturing companies.

Chip output figures is given as up to 10

tons an hour depending on material. 'The shredder', said Shewalton's founder Jimmy Wilson, 'can recycle all forms of waste wood to form a useful product as an alternative to virgin wood, reducing the country's dependence on new wood products and saving valuable landfill space'.

Horizontal infeed of the shredder, Woodtech's Clive Bryceson points out, 'provides a simple and convenient alternative to incline conveyors and overhead chuteworks. Positive-metered infeed reduces hp requirements and helps to ensure safe, smooth operation'. Built-in magnetic separators remove ferrous metals from the finished product.



WSM waste-wood shredder in operation at Shewalton's Irvine, Ayrshire site.