



DECISION TREE: Interim Implementation of the FSC Pesticides Policy

1. Does the CH use chemicals in the FMU?
 - If No, no further action needed
 - If Yes, go to 2
2. Is the chemical an FSC HHP from the newly revised list?
 - If No, the chemical may be used without an ESRA or derogation through August 1, 2020. After August 1, 2020, an ESRA must be completed prior to use of the chemical.
 - If Yes, go to 3
3. Is the chemical an FSC prohibited HHP?
 - If No, go to 4
 - If Yes, does the CH have an approved derogation for the prohibited HHP?
 - If No, beginning August 1, 2019, use is prohibited except in emergency situations or by governmental order. If one of these situations occurs, conformance with Annex 3 is required (including completion of a site-specific ESRA), and (once available) incorporation of requirements from the most recent published draft of the relevant HHP-IGIs is also required.
 - If Yes, the existing approved derogation and its conditions remain valid until August 1, 2020, even if there is no emergency situation or governmental order. After August 1, 2020, use of the HHP is prohibited except in emergency situations or by governmental order, as described above.
4. Does the CH have an approved derogation for the restricted or highly restricted HHP?
 - If No, go to 5
 - If Yes, the existing approved derogation and its conditions remain valid until the expiry date, even if the expiry date is after August 1, 2020, unless the HHP-IGIs are incorporated into the national standard. After the expiry date, or the incorporation of the HHP-IGIs (whichever comes first), the requirements in 6 below must be followed prior to use of the HHP. (NOTE: all derogations with original expiry dates between March 31, 2019 and August 1, 2020 have been extended until August 1, 2020.)
5. Is the HHP: a) newly listed with the approved Pesticide Policy (FSC-POL-30-001 V3-0); or b) previously listed, but did not require a derogation for use (i.e., those marked in green in FSC-STD-30-001A)?
 - If No, go to 6
 - If Yes, the HHP may continue to be used without a derogation or ESRA until August 1, 2020 and after that the requirements in 6 below must be followed prior to use. CH in this situation are encouraged to implement the requirements in 6 below before August 1, 2020, but will not be audited to the requirements until their first scheduled audit after August 1, 2020.
6. Beginning August 1, 2019, the CH must complete an ESRA prior to using the HHP as required in the revised Policy, incorporating any conditions from the most recently approved of any existing approved derogations in the country for the HHP, and (once available) incorporating the requirements from the most recent published draft of the relevant HHP-IGIs.

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