# Orphan Site Pest Management Plan

for the Peace River Regional District and Northern Rockies Regional Municipality





## **Executive Summary**

This Pest Management Plan (PMP) outlines the BCER's comprehensive vegetation management strategy for Orphan sites within British Columbia's Peace River and Northern Rockies Regional Districts.

Emphasizing safety, environmental stewardship, and regulatory compliance, the plan employs an integrated vegetation management approach. The BCER employs a combination of cultural, biological, chemical, and mechanical methods to effectively manage vegetation, in alignment with the Integrated Pest Management Act, thereby minimizing health and environmental risks.

Detailed within the PMP are strategies for mitigating unwanted vegetation; encompassing site assessments, threshold establishment, method selection for control, herbicide application protocols, and contractor oversight.

Collaboration with Indigenous and local communities, landowners, stakeholders, and industry is integral to the success of BCER's invasive weed program. The potential threats posed by invasive and undesirable vegetation to human health, ecosystems, and economic vitality necessitate concerted efforts in prevention and control. Regulatory frameworks, such as the Weed Control Act and BC Integrated Pest Management Act, underpin the PMP's efficacy.

Ultimately, the PMP's overarching goal is to safeguard native species, preserve plant communities, and protect critical wildlife habitats, thereby contributing to the ecological integrity and socio-economic well-being of Northeast BC.

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## 1.0 About the British Columbia Energy Regulator

The British Columbia Energy Regulator (BCER) oversees the full life cycle of energy resource activities in B.C., from site planning to restoration. The BCER ensures activities are undertaken in a manner that protects public safety and the environment, supports reconciliation with Indigenous peoples, conserves energy resources and fosters a sound economy and social well-being. We work collaboratively across government and industry sharing policy and technical expertise in support of B.C.'s transition to low-carbon energy and helping meet future global energy needs.



## Vision, Mission and Values

#### Vision

A resilient energy future where B.C.'s energy resource activities are safe, environmentally leading and socially responsible.

#### Mission

We regulate the life cycle of energy resource activities in B.C., from site planning to restoration, ensuring activities are undertaken in a manner that:



Protects public safety and the environment



Conserves energy resources



Supports reconciliation with Indigenous peoples and the transition to low-carbon energy



Fosters a sound economy and social well-being



#### Values

Respect is our commitment to listen, accept and value diverse perspectives.

Integrity is our commitment to the principles of fairness, trust and accountability.

Transparency is our commitment to be open and provide clear information on decisions, operations and actions.

Innovation is our commitment to learn, adapt, act and grow.

Responsiveness is our commitment to listening and timely and meaningful action.

## 2.0 About the Orphan Site Reclamation Fund

In cases where an oil and gas company is deemed insolvent or cannot be located, the BCER may designate sites as orphans. This authority comes from Section 45 of the <u>Energy Resources Activities Act</u> and allows the process of site restoration to continue. Once declared an orphan site, the BCER may use the industry funded Orphan Site Reclamation Fund (OSRF) to decommission and restore it.

The OSRF is an annual levy on industry permit holders used to pay the cost of restoring orphan sites (orphans, orphan sites, sites) in B.C., which includes well sites, pipelines, facility sites, risers, access roads, and other associated activities (borrow pits, remote sumps, laydown yards, log decks). The OSRF ensures the site will be restored in accordance with current legislation and regulations, including vegetation management and noxious weed control.



#### 3.0 Introduction

The <u>Integrated Pest Management Act</u> (IPMA) requires that management of vegetation on specified industrial sites be approved under a single, comprehensive Pest Management Plan (PMP), which ensures:

- Compliance with the provisions of the IPMA, <u>Integrated Pest Management Regulation (IPMR)</u>, and other applicable federal, provincial and regional laws and regulations;
- Indigenous, stakeholder, and public awareness of the BCER's vegetation management programs;
- Outlines a program for managing pest populations or reducing damage caused by pests, based on integrated pest management (IPM);
- The responsible use, handling, transporting, and storage of pesticides;
- Identifying and protecting environmentally sensitive areas and land uses;
- The incorporation and use of integrated pest management plan

Pesticide means a micro-organism or material that is represented, sold, used, or intended to be used to prevent, destroy, repel, or mitigate a pest, and includes:

- a plant growth regulator, plant defoliator or plant desiccant,
- a controlled product as defined in the Pest Control Products Act (Canada), and
- a substance that is classified as a pesticide by regulation

Pesticide use includes mixing, preparing, applying, and possessing for the purpose of applying. The terms pesticide and herbicide are used interchangeably throughout this PMP and refer to chemicals used to treat pests.

The scope of this PMP will be limited to ground-based applications only. Aerial transport may be used to access sites, however, all applications will be ground-based. The BCER, its contractors, and agents will use this PMP when carrying out vegetation management activities on Orphan sites in northeast BC.

#### 3.1 Geographic Boundaries of the Plan Area [IPMR Section 58(1)(a)]

The geographic extent of this PMP is limited to the BCER controlled sites maintained through the OSRF in northeast BC. Appendix A of the PMP illustrates these geographic boundaries. An interactive map is also available on the Orphan sites homepage located at <a href="https://www.bc-er.ca/what-we-regulate/oil-gas/orphan-sites/">https://www.bc-er.ca/what-we-regulate/oil-gas/orphan-sites/</a>

#### 3.2 Term of the Pest Management Plan

The term of the plan is for 5 years (2024-2029) from the date the Pesticide Use Notice is confirmed by the BC Ministry of Environment.

### 3.3 Person Responsible for Managing Pests [IPMR Section 58(1)(b)(c)]

Within OSRF, the person responsible for managing pests and the principal contact for information relating to this PMP is:

Chad Moffat BC Energy Regulator 6534 100th Ave.,

Fort St. John, BC, V1J 8C5 Email: <a href="mailto:orphanpmp@bc-er.ca">orphanpmp@bc-er.ca</a> Phone: 1-250-794-5200



## 4.0 Integrated Pest Management Principles and Purposes

Integrated Pest Management is a science-based, sustainable decision-making process that identifies risks from pests and their management related strategies. It coordinates environmental practices, the biology and life cycle of the pest, and available technology to minimize pest damage, while minimizing risk to people, the land, and the environment.

The purpose of this PMP is to describe vegetation management while incorporating the principles of IPM. Vegetation management is not limited to just noxious and/or nuisance vegetation, rather it includes any undesirable vegetation on a site including grasses, broadleaf plants, shrubs, and trees.

Restoration goals lead the BCER's need to control vegetation within and around Orphan sites. The goals include:

- Compliance with provisions of the <u>BC Weed Control Act</u> that requires occupiers of land to control noxious weeds;
- Improved restoration efforts to rehabilitate disturbed ecosystems;
- Reduce long-term program costs;
- Continue to consider alternative, non-chemical methods of invasive plant management while recognizing that herbicides may be required for management for a number of species;
- Ensure existing invasive plant populations are kept from expanding beyond a defined management area.

#### 4.1 The Principles of Integrated Pest Management (IPM)

In order to ensure effective vegetation management at all of its sites, the BCER has adopted the principles of IPM. IPM means a process for managing pest populations that includes the following activities:

- 1) Planning (prevention) and managing ecosystems to prevent organisms from becoming pests;
- 2) Identifying high risk sites and identify high priority plants;
- Developing treatment plan(s);
- 4) Monitoring efficacy to determine whether treatment thresholds were met (if not, repeat steps 3, 4, and 5)
- 5) Eliminating undesirable plant populations using appropriate biological, physical, cultural, mechanical, behavioural and chemical controls combinations; and,
- 6) Evaluating the effectiveness of pest management strategies.

#### 4.1.1 Planning and Prevention [IPMR Section 58(2)(a)]

Preventative measures aimed at stopping the initial growth and spread of unwanted vegetation are an integral part of an IPM program. In some instances, preventative measures may reduce the need for future maintenance using both pesticide and non-pesticide control methods.

The easiest and most effective method to prevent species invasion is preventing early establishment. For plants which have been detected in a given area, the most effective method of control is to prevent the plants from establishing and spreading. This will be achieved by training staff and contractors who conduct site visits on what to look for and how to report findings. The reports will be used in tandem with an assessment process and response system to quickly implement the management before the species have a chance to establish.

For established plants, prevention of further spread can be accomplished by the promotion of healthy, weed resistant habitats. Disturbed areas such as those created by oil and gas development can cause vulnerability to invasive species; therefore, it is important to clean equipment and footwear to prevent the introduction and spread of invasive plant species to these vulnerable sites. When areas have been disturbed, prompt seeding will help to re-establish healthy, weed resistant plant populations.

The following land management options will be implemented when feasible and applicable:

- Prevent the movement of soils contaminated with invasive plant seed and vegetative plant propagules.
- Educate onsite employees and contractors on work practices which will reduce the spreading of invasive plant seeds and plant parts
- Prior to leaving areas with invasive plants inspect vehicles, equipment and clothing and remove (by cleaning or washing) plant seeds or plant parts
- Keep equipment out of infested areas
- When possible, proactively re-vegetate disturbed areas by encouraging rapid native plant succession, artificially seeding and fertilizing or a combination thereof

#### 4.1.2 Pest Identification [IPMR Section 58(2)(b)]

Unwanted vegetation growing within or adjacent to Orphan sites will be termed "weeds" within this PMP. Weeds are a term used to describe vegetation growing where it is not desired (i.e., interfering with human and wildlife activity, decreasing the biodiversity, causing safety issues, etc.), and is therefore considered to be a pest. The accurate identification of unwanted vegetation (i.e., weeds) at Orphan sites is important for several reasons:

- Depending on their growth rates and characteristics, and their location within the site, control may not be warranted or desirable. For example, non-invasive vegetation growing on a topsoil storage berm is desirable;
- Control methods may differ depending on the plant species. Some may be easily controlled by non-chemical methods, but others, may only be managed through the use of certain types of herbicides; and,
- Certain plants may be noxious weeds and must be controlled by law. A current listing of provincial and regional noxious weeds is found in the BC <u>Weed Control Regulation</u>, <u>Schedule</u>

Numerous resources are available to assist in the identification of unwanted vegetation. BCER staff and contractors use field guides and other identification tools to help them identify weeds, most of which are not available online. Table 1 provides a short listing of the many online resources available.

**Table 1: Vegetation Identification Information Available Online** 

| BC Ministry of Forests,     | "Field Guide to Noxious       | https://bcinvasives.ca/wp-                  |
|-----------------------------|-------------------------------|---|
| Lands and Natural           | Weeds and Other Selected      | content/uploads/2023/05/Field-Guide-to-     |
| Resources and Invasive      | Invasive Plants of British    | Noxious-Weeds-12th-WEB.pdf                  |
| Species Council of British  | Columbia" (Download           |   |
| Columbia                    | required)                     |   |
| DC Ministry of Agriculture  | "Guide to Weeds in British    | https://www.i.a.gov.ba.co/ossats/gov/onviro |
| BC Ministry of Agriculture, |                               | https://www2.gov.bc.ca/assets/gov/enviro    |
| Food, and Fisheries         | Columbia"                     | nment/plants-animals-and-                   |
|                             | (Download required)           | ecosystems/invasive-                        |
|                             |                               | species/alerts/guidetoweeds                 |
| E-Flora BC                  | Electronic Atlas of the Flora | https://linnet.geog.ubc.ca/DB Query/Quer    |
|                             | of British Columbia           | <u>yForm.aspx</u>                           |
|                             | (Taxonomic plant website)     |   |
|                             |                               |   |
| Peace River Regional        | Profile of Invasive Plant     | https://prrd.bc.ca/services/invasive-       |
| District                    | Species 2022-2025             | plants/#plans-and-reports                   |
|                             | (Download required)           |   |
|                             |                               | https://prrd.bc.ca/services/invasive-       |
|                             | PRRD Invasive Plants          | plants/#plans-and-reports                   |
| Invasive Species Council of | Find an invasive species      | https://bcinvasives.ca/take-                |
| BC                          | (Interactive webpage)         | action/identify/                            |

#### 4.1.3 Monitoring Pest Populations [IPMR Section 58(2)(c)]

BCER staff and contractors monitor vegetation on or adjacent to their sites. Monitoring of sites provides a record of information about weed occurrence and density, and site conditions. Monitoring also includes recording information on changes to weed species composition, distribution, and density over time, as well as changes to adjacent plant communities that could invade the site. Monitoring is generally done visually and documented in writing.

#### 4.1.4Monitoring Methods [IPMR Section 58(2)(c)(i)]

Monitoring is generally carried out on foot or by vehicle, depending on the terrain. Monitoring normally consists of a visual inspection, where the density, location and type of vegetation present are documented. When a site is designated an Orphan, the BCER, in conjunction with the vegetation management contractor and landowners, will begin monitoring sites to ensure that treatments are applied at the most effective times for weed control. The frequency of site monitoring is determined by the volume and type of weeds onsite. Sites that are heavily infested or have environmental sensitivities will be monitored more frequently.

#### 4.1.5 Data Collected During Monitoring [IPMR Section 58(2)(c)(iii)]

During monitoring, each site will be visually assessed to determine if treatments are necessary, and, if treatments are deemed necessary, on the timing of the treatments. The monitoring that is done at each site is visual, and the results may be recorded on a Site Management Plan and Data sheet.

The BCER Site Management Plan and Data Sheet provides a starting point for the collection of site information for sites requiring integrated vegetation management. A copy of this Site Data Sheet and Management Plan is shown in Appendix B. Lesser infested sites for which a Site Data Sheet and Management Plan is not developed will have an informal prescription prepared prior to treatment. The prescription will contain the following:

- Site sensitivities (nearby water bodies, pesticide-free zones, residual-free zones);
- Current conditions (surfacing materials, list of weed species within and outside the site);
- Preventive measures that can be taken; and
- Recommended treatment methods, procedures, and timing.

#### 4.1.6 Injury Thresholds [IPMR Section 58(2)(d)]

Treatment of weeds/vegetation within Orphan sites is required when the vegetation reaches a certain level. This level is termed the treatment threshold, which is the level of surface weed cover, expressed as a percentage of the total area, which can be tolerated and still maintain the integrity, security, and safety within the site.

#### 4.1.7 How Injury Thresholds are Chosen [IPMR Section 58(2)(d)(i)]

Sites with weed cover above the established treatment threshold requires a vegetation management action. Treatment thresholds will vary, since vegetation control is more critical for certain areas within each site. They can be specific and include all weed species, or they may be specific to one weed species.

Consequently, the level of control required is determined by either the:

- Type of site;
- Density of weed establishment; and/or
- Specific weed problem species.

Only specific high-risk weed species will be managed in areas such as infrequently used sites. When present and where possible, these species will be selectively controlled in a manner that minimizes the disturbance to nearby vegetation.

#### 4.1.8 Injury Threshold Application [IPMR Section 58(2)(d)(ii)]

The BCER and/or its contractors will visually assess the weed cover, and a decision will be made to act against weed problems based on the specific treatment thresholds described below. Prior to any treatment, the BCER and its contractors will become aware of all site sensitivities and treat accordingly.

#### 4.1.9 Treatment Options & Selection Criteria [IPMR Section 58(2)(e)]

IPM involves the use of different techniques to control undesirable vegetation on Orphan sites. The IPM control techniques proposed for use under this PMP include physical, cultural, biological, and chemical (herbicides). Control methods will be determined based on site conditions and restoration objectives. If there is an invasive plant or undesirable vegetation problem in or immediately adjacent to the operating area, then a suitable combination of strategies to control the population must be developed and implemented. The selection of treatment methods considers the control options available, potential cost of treatment, and environmental impact of the targeted invasive species. Depending on the objectives for the site, treatment methods should focus on practices that prevent weeds from producing viable seed, prevent vegetative propagation, suppress growth or vigour of the invasive weeds, or eradication.

#### Physical or cultural control

- Cultural control involves removing the whole plant or portions of the plant at critical times in the plant's life cycle. Hand weeding, mowing, or cutting, cultivation and burning are the main approaches.
- Hand weeding is useful for small patches. Plants should be pulled prior to seed production and when soil is wet. Wear gloves and long sleeve shirt to avoid any allergic reaction to plant material.
- Mowing/cutting is acceptable when there are too many plants for hand pulling and cultivation or herbicides are not practical. Annual species must be cut before seed-set; perennials will require several cuts to deplete root reserves
- Noxious weeds removed should be disposed by bagging and taking to a landfill to avoid reintroduction
- Cultivation prevents seed production in annuals and depletes reserves and destroys underground roots in perennials. Sites must be reseeded immediately after cultivation or continually cultivated to prevent establishment of more or other invasive species.
- Burning can be effective for destroying seeds and should be used where seed production has already occurred. Safety precautions need to be considered if planning burning treatments.
- Maintaining a vigorous plant cover and revegetating as soon as practicable after soil disturbance. Areas that require no vegetation due to safety or integrity will not be revegetated.

#### **Biological Control**

Biological control uses natural predators of the invasive species to establish a long-term balance between the biocontrol organism (agent) and the species. Biological control may kill the invasive plants directly or indirectly by decreasing reproductive and competitive abilities or plant vigour, which in turn encourages the re-establishment of native vegetation. Examples of biological control include the use of goats, sheep, fungi, bacteria, and insects. Presently, the BCER is not actively using biological controls, however, Orphan sites near ongoing biological control activities managed by other parties may benefit from that action. Furthermore, if it is deemed that a biological control agent could provide benefit to a, Orphan site, the BCER is not opposed to using this method as long as the introduction of the biological control agent does not negatively impact the area.

#### Chemical control (Herbicides) Selection IPMR Section 58(2)(e)

Although a main objective of this PMP is to minimize the use of herbicides for the control of problem vegetation where viable alternatives exist, herbicides are a valuable tool in vegetation management. This is especially true in areas where non-chemical methods cannot be employed, primarily because of safety issues.

While mechanical and cultural control are an important part of the BCER's IPM program, in some instances these methods can be impractical, dangerous for workers, incompatible with environmental protection values, labour intensive and expensive. Some mechanical methods are non-selective and can lead to soil erosion by removing a high percentage of the vegetative ground cover; they can also damage compatible plant species such as low growing shrubs and grasses. Biodiversity is reduced when non-selective methods are used to remove most of the vegetation from a site.

#### The rational for herbicide choice includes:

- The safest and most effective herbicide will be chosen depending on the site characteristics, injury threshold required and species of invasive plant;
- Herbicides are a useful tool that can be integrated with mechanical and/or cultural control to reduce or eliminate the spread of invasive species;
- The use of herbicides applied at prescribed label application rates (i.e. listed on the label) should provide excellent control of target invasive plants;
- Specific herbicide use will help rapidly reclaim lost lands due to heavy infestations of invasive species;
- It is very unlikely that manual, mechanical or cultural techniques alone will be effective at achieving the required level of control to reduce the spread of high priority invasive plants and manage existing infestations at priority sites due to their specialized biology and persistence;
- Herbicide use is often the only practical and safe method of controlling vegetation where passage with heavy equipment is unsafe; and
- Herbicides are considerably more economical when compared to mechanical.

#### **Herbicide Characteristics**

Herbicides can be classified depending on the combination of characteristics:

#### Selective vs Non-Selective

- Selective herbicide is designed to effectively control specific weeds and not other desirable species; examples include Milestone, 2,4-D, and MCPA.
- Non-selective herbicide will effectively control most vegetation including desirable species.
   Additional care is needed when applying non-selective herbicide to ensure desirable species are not accidentally impacted. Glyphosate (Roundup) is the most well-known variety of non-selective herbicide.

#### Residual vs. Non-Residual

• Residual herbicide is one that tends to persist in the soil for a period of time. Most residual herbicides provide season long control of their targeted species, with many some spanning

- beyond single season control. Trade names of residual herbicides include Milestone, Tordon 22K, and Ally.
- Non-residual herbicide breaks down quickly in the soil and leaves little or no residue. Glyphosate (Roundup) is the most well-known variety of non-residual herbicide.

#### Pre-Emergent vs. Post-Emergent

- A pre-emergent herbicide controls weed seeds and sprouts before they leave the ground. These are generally residual herbicides that enter the plant from the soil.
- A post-emergent herbicide is applied directly onto the growing foliage or plant stems. These can be either residual or non-residual herbicides.

#### Systemic vs. Contact

- Systemic herbicides kill the entire plant by spreading gradually throughout its vascular system, from either foliar application down through the plant, or soil application, up towards the leaves. Systemic herbicides work after being absorbed by a plant's leaves or roots and translocated to the rest of the plant.
- Contact herbicides are those that only affect the part of the weed that they "contact" They
  don't move into or affect any other part of a plant. They were the first herbicides used and
  surprisingly, they still are better at controlling some weeds than any other products that have
  been developed.

All herbicides are grouped according to their mode of action on the plant. When described, these chemicals are often identified as being part of an herbicide group: Group 1, Group 2, etc. This differentiation of herbicide groups is important in preventing herbicide resistance from developing. Using different modes of action and different herbicide groups to control problem weeds will help to prevent plants from building a herbicide resistance. Details on the herbicide groups, their actions, and expected symptoms can be found in Appendix C.

A full listing of the herbicides, their herbicide group, active ingredient, and common trade names can be found in Appendix D of this PMP. The broad listing of herbicides allows the BCER to make site- and species-specific treatment decisions. Due to many of the listed active ingredients being for available for use under multiple trade names, only the most common names are provided. Any or all products, registered for sale or use in Canada, containing one or more of these active ingredients may be used.

#### Herbicide Application Equipment

The application equipment proposed for use in applying herbicides under this PMP include:

- Backpack A backpack is a portable, manually operated, pressurized container with a nozzle for spraying herbicides. Directed spray from a backpack unit will selectively control targeted vegetation;
- Boom Sprayer Boom sprayers are widely available commercially for UTVs and agricultural

- tractor equipment. They use a solution tank and booms with evenly spaced nozzles to deliver a controlled volume;
- Boomless Sprayer Boomless sprayers are specialized equipment designed to develop and deliver a uniform droplet size and pattern. This is usually accomplished with a system that uses multiple orifices in fewer nozzles, lower pressures and higher water volumes for even herbicide distribution.
- Power hose Spray gun A hand-held spray gun and hose attached to a portable tank filled with herbicide will selectively control a variety of vegetation with directed spray. Spray guns are efficient for larger scale applications, and can be used for the application of all herbicide liquid mixtures.
- Wick Applicator Wick applicators are used to selectively apply herbicide by wiping it directly
  onto plants. Wicks are made of rope or absorbent pads. Wipe-on wick application is ideal for
  areas where no spray drift can be tolerated.
- Squirt Bottle A hand-held, non-pressurized container, used to apply the herbicide active ingredients.

#### 4.1.10 Treatment Selection Criteria [IPMR Section 58(2)(e)(iv)]

IPM involves a decision-making process that ensures the most suitable, effective, environmentally compatible, and cost-effective method or combination of methods is selected for a particular site. In making these decisions, the BCER and contractors will generally use the following assessment criteria to justify and evaluate the method(s) chosen:

- Urgency of the required treatment;
- Species of problem vegetation;
- Current life stage of problem vegetation;
- Location and accessibility of the problem vegetation (stream, pasture, terrain, etc.);
- Safety issues;
- Effects of not treating the site;
- Effect on adjacent property owners and land uses;
- Indigenous and public concerns;
- Short and long-term impacts of the method(s) being considered;
- Expected efficacy of the method(s) being considered;
- Environmental considerations (proximity to water sources, bodies of water, food growing or planted for human consumption, riparian areas, wildlife and fish habitat); and,
- For herbicide treatments, the choice of herbicide, application methods and equipment.

Wherever possible the contractor and the BCER will work to ensure that treatments are applied at the most effective time for weed control. If the treatment option being considered involves the use of an herbicide, the most effective control will be achieved if the herbicide is applied at the correct growth stage of the weed.

At the conclusion of the treatment, the contractor will record on the plan the following information:

Site location;

- Weather, date, and time of treatment;
- The target species;
- The active ingredient(s) applied, application rate, total area treated;
- An estimate of the total area treated

#### 4.1.11 Post Treatment Evaluations [IPMR Section 58(2)(f)]

During their regular operations and maintenance site visits, the BCER and its contractors will monitor the effectiveness of vegetation management treatments.

Post treatment evaluations will determine:

- Compliance with the commitments made in this PMP;
- Compliance with the IPMA and IPMR;
- That site objectives have been achieved;
- The success of the treatment methods utilized;
- If pesticide free zones, no treatment zones and buffer zones were maintained;
- If any negative environmental impacts have occurred; and,
- If corrective action is required.

Inspections will be undertaken on the ground and will generally be based on visual evaluations. Evaluations may include both qualitative and quantitative determinations of mortality to the targeted species, as well documentation of any non-target treatment that is evident. Effectiveness of the treatments will be evaluated. Appendix G provides an example of a Post-Treatment Inspection report.

The above information can also be used in the Sites Site Data Sheet and Management Plan.

## **5.0 Environmental Protection Strategies and Procedures**

All pest management activities undertaken under this PMP (both chemical and non-chemical) incorporate measures designed to protect the natural environment including:

- Community watersheds;
- Domestic and agricultural water sources;
- Fish and wildlife, riparian areas, bodies of water and wildlife habitat;
- Herbicide contamination of food intended for human consumption;
- Pre-treatment inspection procedures for identifying treatment area boundaries;
- Procedures for monitoring weather conditions and strategies for modifying herbicide application methods for different weather conditions; and,
- Procedures for pre-treatment inspections to ensure protection of human health and the environment during treatment period.

In this PMP, all pesticide free zones (PFZ) and no treatment zones (NTZ) will comply with the standards contained in Division 7 of the IPMR.

#### 5.1 Water Protection PFZs and NTZs

The BCER based the size of the pesticide-free zone (PFZ) and no treatment zone (NTZ) on the standards currently contained in the IPMA and the IPMR.

#### **Definitions:**

**Body of water** – any watercourse or body of water, such as a stream, river, wetland, or lake, but not including a human-made, self-contained body of water or structure of water.

**No-treatment zone (NTZ)** – an area of land that must not be treated with pesticides. NTZs will be identified, marked/flagged prior to any herbicide application.

**Pesticide-free zone (PFZ)** – an area of land that must not be treated with pesticides, and must be protected from pesticides moving into it. PFZs are measured by the horizontal distance from the high water mark. PFZs will be identified, marked/flagged prior to any herbicide application.

**Riparian** – the area of land adjacent to a stream, river or wetland that contains vegetation that, due to the presence of water, is distinctly different from vegetation of adjacent upland areas.

**Stream** – a watercourse that contains water on a permanent or seasonal basis, is scoured by water, or contains observable deposits of mineral alluvium, and which has a continuous channel bed that is 100 m or more in length, or flows directly into a fish stream or a fish-bearing lake or wetland, or a licensed waterworks.

**No-treatment zone (NTZ)** – an area of land that must not be treated with pesticides. NTZs will be identified, marked/flagged prior to any herbicide application.

**Wetland** – a swamp, marsh, bog, or other similar area that supports natural vegetation, and which is distinct from adjacent upland areas.

#### **5.2 Strategies to Protect Community Watersheds**

Prior to herbicide use, the BCER shall implement the following strategies to protect community watersheds:

- The location of community watersheds to be protected shall be verified by accessing the Community Watershed website of the BC Ministry of Sustainable Resource Management at http://www.env.gov.bc.ca/wsd/data\_searches/comm\_watersheds/index.html;
- Herbicides shall not be stored within a community watershed for more than 24 hours prior to their use, and shall be removed from the community watershed within 7 days of use, unless they are stored in a permanent structure;
- A 10 metre PFZ shall be maintained from the point of herbicide application and all bodies of water within the community watershed;
- A 30 metre PFZ shall be maintained down slope from the point of herbicide application and all

licensed water intakes within the community watershed;

- A 100 metre PFZ shall be maintained upslope from the point of herbicide application and all licensed water intakes within the community watershed; and
- All PFZs shall be measured and marked/flagged prior to herbicide use;

#### 5.3 Strategies for Protecting Fish and Wildlife, Riparian Areas and Wildlife Habitat

In addition to the PFZ's specified earlier for bodies of water, extreme caution will be exercised when working with herbicides adjacent to and within sensitive ecosystems including riparian and sensitive wildlife habitat.

Riparian vegetation management considerations shall include provisions to ensure there is no harmful alteration, damage or destruction to fish or their habitat. This includes procedures to minimize impact to vegetation cover, bank stability, turbidity, and nutrient cycling.

In order to achieve this, hazard assessment documentation shall describe best management practices. These will be reinforced during initial contractor meetings, as well as field safety meetings with contactor staff and field workers. There shall be regular inspections, and in some cases, there shall be detailed and direct supervision by subject experts.

#### Best management practices include:

- No refueling of machinery or mixing of herbicide within 15 metres of a riparian zone;
- No clean up or disposal of herbicide materials within 15 metres of riparian zones;
- Preserving as much vegetation as possible around riparian zones;
- Ensuring no deleterious materials enter the watercourse, including herbicides, fuels, debris, sawdust, or sediment; and
- Herbicide use will not remove vegetation that is needed to prevent erosion of a streambank.

#### Wildlife and their habitat will be protected as follows:

- Control noxious weeds (as designated under the Weed Control Act);
- Identify and protect, where possible, high-value wildlife vegetation and wildlife trees;
- Ensure that herbicide use is directed only at target vegetation;
- Minimize soil erosion caused by vegetation management activities to reduce impact on desirable plants or wildlife; and
- Identify and protect wildlife features such as significant mineral/salt licks
- A significant mineral lick means a naturally occurring mineral lick that is used at least annually by one or more species as evidenced by:
  - well-established trails or braided trail systems leading to the mineral lick site;
  - extensive excavation or trampling; and/or
  - teeth marks, pellets, tracks, and hair.

All herbicides used by the BCER have been approved by the federal <u>Pest Management Regulatory Agency</u>. When used properly, these approved herbicides are unlikely to have any toxic effects on wildlife. To ensure the protection of wildlife and their habitat, applicators will continuously survey their work area for indicators of wildlife use, and adjust their actions accordingly.

#### 5.4 Strategies to Prevent Herbicide Contamination of Food Intended for Human Consumption

Orphan sites are not frequently located near environmentally sensitive areas such as lawns, vegetable gardens, berry picking and bee keeping areas but are frequently located near areas containing agricultural crops and domestic animals. Food for human consumption is sometimes grown or found within these areas.

Prior to herbicide applications, the BCER will ensure strategies are developed and implemented to prevent herbicide contamination of food intended for human consumption including:

- During the PMP consultation process, First Nations are invited to forward the names of those
  plant species of cultural importance, so that they are not inadvertently affected during
  treatment activities. Additional undesirable invasive plant species will be added to this list if
  identified by First Nations, stakeholders, and other groups or individuals. Efforts will continue
  through formal and informal consultation to determine the locations of these activities. Some
  measures could include delay of treatment or alteration of treatment boundaries;
- Non-chemical methods of invasive plant management shall be considered where treatment objectives can be achieved;
- If control methods involve the application of herbicides, increased NTZs may be maintained, if required, during herbicide applications around areas where food for human consumption is growing;
- Treatment notices shall be posted at public access points to proposed treatment areas advising
  of treatment near the food crops. This will ensure that people are aware that the area has been
  treated with herbicides; and,
- Where possible, herbicide treatments shall be timed to minimize impacts on food plants.

Table 2: NTZ and PFZ setbacks to Wildlife, Domestic, and Agricultural Water Sources

|   | Required     |
|---|--------------|
| All Herbicides  | Distance     |
| Demostic and agricultural walls and water intakes                                       | 30 metre     |
| Domestic and agricultural wells and water intakes                                       | NTZ*         |
| Any water body or stream using any pesticide except glyphosate, subject to label        | 10 metre PFZ |
| restrictions  | 10 med e FF2 |
| Glyphosate Applications   |              |
| A water body or stream that is fish bearing and not within an industrial site (as       | 5 metre PFZ  |
| defined by Integrated Pest Management Regulation)                                       |              |
| A water body or stream that is fish bearing and within an industrial site (as defined   | 2 metre PFZ  |
| by Integrated Pest Management Regulation)   | 2 metre PFZ  |
| A permanent water body that is not fish bearing at any time of the year                 | 2 metre PFZ  |
| Dry streams that are not fish bearing at any time of the year and do not drain directly | 0 metre PFZ  |
| into fish bearing water, at any time of the year  |              |
| Up to high water mark of a temporary free-standing body of water that is not fish-      | 0 metre PFZ  |
| bearing and does not drain directly into fish-bearing water, at any time of year        |              |

<sup>\*</sup>The 30m NTZ may be reduced if the certified applicator is reasonably satisfied that a smaller zone will ensure no herbicide will enter the water supply, intake or well.

#### 5.5 Pre-Treatment Inspection Procedures for Identifying Treatment Area Boundaries

The following procedures shall be implemented to ensure that treatment area boundaries are identified and clearly marked prior to herbicide applications:

- A pre-treatment inspection shall be conducted to establish treatment boundaries and to document the location of environmentally sensitive areas;
- Treatment area boundaries and the location of environmentally sensitive features shall be mapped;
- A pre-treatment meeting shall be held with the Contractor to confirm treatment area boundaries and the locations of environmentally sensitive features; and,
- Marking/flagging of all PFZ's and NTZ's shall be completed, and the Contractor instructed to observe these areas, prior to herbicide application

#### **5.6 Procedures for Monitoring and Adjusting to changing Weather Conditions**

Personnel will check the product label for guidelines for applying herbicides under various weather conditions, as well as monitor weather information obtained from Environment Canada and other official and recognized sources. Before and during herbicide application, personnel will record and consider the effects of the following:

- Precipitation
- Wind (both speed and direction)
- Temperature
- Any other abnormal weather event, such as snow, frost, etc.
- Herbicide application must stop if:

- The maximum temperature stated on the herbicide label is exceeded;
- The wind speed and/or direction cause the handgun or backpack application of herbicide to drift and/or miss the target vegetation; or
- It begins to rain, increasing the chances of excessive runoff and/or leaching.

## **6.0 Operational Information**

#### 6.1 Qualification and Responsibilities of Persons Applying Herbicides

All herbicide applications will be supervised by qualified contractors in possession of a valid Pesticide User License and be a <u>Certified Pesticide Applicator</u>. Any personnel assisting must have completed the Assistant Applicator training. The Certified Pesticide Applicator's responsibilities are:

- Be in continuous attendance at the site;
- Have available proof of certification;
- Ensure all assistants have applicable <u>Assistant Applicator training</u>;
- Maintain continuous auditory and/or visual contact with the uncertified applicators;
- Be within 500m of the persons being supervised; and
- Comply with the reporting standards outlined in Division 7 of the IPMR.

A certified individual who is supervising assistant applicators:

- must not be more than 500 m from each assistant applicator,
- must maintain continuous visual or auditory contact with each assistant applicator,
- must review the record kept under section 59.2 [training and training records] in respect of each assistant applicator, and
- must not permit an assistant applicator to apply a pesticide unless satisfied that the assistant applicator has completed the course required under section 59.2 (1).

#### **6.2 Protective Equipment**

Protective clothing and equipment required during pesticide mixing, loading, application and disposal will conform with Workers' Compensation Board Occupational Health and Safety Regulations. Equipment such as protective clothing, headgear, eye and face protection, gloves, footwear, and respiratory protection equipment must be used where required. Applicators will review the pesticide's Safety Data Sheet prior to handling, mixing, and/or applying to verify the protective equipment needed.

#### **6.3 Procedure for Safe Transportation of Herbicides**

The transportation of pesticides will comply with all current legislation, federal and provincial, governing their transport. In addition, the following procedures will be followed while pesticides are being transported for application under this PMP:

- Limited amounts of pesticides will be carried in any one vehicle. The quantity will be no more than what is necessary for each project except where transportation between storage facilities occurs;
- Pesticides will be carried in a secure lockable compartment to prevent against spillage and unauthorized removal;

- Pesticides will be transported in original labeled containers. If labels are not available, the
  pesticides shall be placed in an appropriate container that have the trade name, active
  ingredient and active ingredient concentration and pesticide registration number affixed to
  the outside of the container;
- Pesticides will be transported separately from food and drinking water, safety gear and people;
- Spill containment and clean up equipment will be transported separately from pesticides, but in close proximity to them, on each vehicle during transport and use;
- Appropriate documents such as Safety Data Sheets (SDS), this PMP and the PMP approval document, will be available during transport and use of pesticides;
- All documents and placards will be carried in, or placed on, transport vehicles as required under the Transportation of <a href="Dangerous Goods Act">Dangerous Goods Act</a>, the IPMA, and IPMR;
- All pesticide containers will be inspected for defects prior to transporting, and will be secured against spillage or unauthorized removal; and
- Read and understand the herbicide labels and SDS prior to the transport of the herbicide.

#### 6.4 Procedures for Safely Storing Herbicides [IPMR Section 66]

All pesticides will be supplied by the contractor, who must follow, as a minimum, the storage requirements described below:

- Pesticides stored on BCER or the contractor's property will be in accordance with the IPMA, and IPMR; and WorkSafe BC's document "Standard Practices for Pesticide Applicators";
- Be ventilated to the outside atmosphere;
- Be locked when left unattended;
- Be entered only by persons who are authorized to do so; and,
- Have a placard affixed and maintained on the outside of each door leading into the facility in
  which the pesticides are stored bearing, in block letters that are clearly visible, the words "
  WARNING CHEMICAL STORAGE -AUTHORIZED PERSONS ONLY ", Appendix E provides an
  example of this placard.

In addition, the person responsible for the storage area shall notify the appropriate fire department of the presence of the pesticide on the premises.

While the BCER has no direct control of the pesticide storage practices of its contractors, their storage requirements are governed by the provisions within the IPMA and IPMR.

Contractors may store pesticides for extended periods of time in vehicles, which will be considered to be a mobile storage unit. Persons responsible for the pesticide storage will ensure the pesticides are stored in a locked cabinet or similar arrangement; and will be separate from the driver, food intended for human or animal consumption, and the worker's personal and protective gear.

#### 6.5 Procedures for Safely Mixing and Loading Herbicides

Personnel will follow these instructions to mix and load herbicides:

• Ensure that persons mixing or loading herbicides are Certified Pesticide Applicators, and will

- use proper protective equipment and clothing;
- Before mixing, read the product label and Safety Data Sheet, and follow all safety precautions and mixing instructions;
- Ensure that emergency wash facilities, first aid equipment, spill kits, spill response plans, each herbicide's SDS, a copy of this PMP and emergency response plan and emergency contact information are available onsite;
- Use clean water free of any suspended particles;
- Use appropriate procedures to prevent backflow of herbicides into the water source;
- Conduct mixing and loading in areas a minimum of 15m of any pesticide-free zones to prevent
  any spilled herbicides from entering water bodies, water wells, water intakes or other
  environmentally sensitive areas;
- When drawing water from a waterbody or an irrigation system, maintain a gap between the herbicide and the equipment to prevent backflow;
- Do not wash or submerge in a waterbody any container used to prepare, mix, or apply herbicides;
- Keep containers well below eye level to prevent splashing or spilling herbicides in the face or eyes; and
- Pre-mix wettable powders with water to reduce airborne dust.

#### **6.6 Procedures for Safely Applying Herbicides**

Personnel will follow these instructions to apply herbicides:

- Conduct a pre-job Hazard Assessment meeting with all personnel on site to discuss the intended work schedule, the work plan for the site, the types of herbicides being used, intended length of time to be on site and current and forecasted weather conditions;
- Herbicides will be generally applied during periods of low staff or public presence, in the early morning or evening, or on weekends if necessary;
- Whenever possible, herbicides will be applied when target species are at their most susceptible stage;
- Use the most practical, suitable, target-specific application techniques, possible for the application. These may include any of the approved methods of application;
- Do not use foliar applications if the wind speed exceeds 8km/hr;
- Follow directions and restrictions on product labels and SDS for all herbicides;
- Do not spray herbicides if it is raining;
- Do not apply any herbicide within a pesticide-free zone, residual-free zone, or no treatment zone;
- Do not spray herbicides on foliage covered by ice or frost;
- Do not use a residual herbicide on water-saturated soil, during heavy rainfall, or if heavy rainfall is imminent; and
- Record and report the herbicides to be used, application rates, timing, quantities, treatment area, and species to be controlled, and closely follow all specifications.

#### 6.7 Procedures for Safe Disposal of Empty Herbicide Containers and Unused Herbicides

The contractor is responsible for the proper disposal of empty, and unused herbicides and their containers. Personnel shall follow these procedures for safely disposing of empty herbicide containers and unused herbicide:

- Plan all applications carefully to minimize excess and waste;
- Ensure that all herbicide waste is disposed of in a manner consistent with the requirements of the BC <u>Environmental Management Act</u>, the IPMA, IPMR, and the manufacturer's instructions as noted on the product label;
- All empty containers must be:
  - Triple rinsed or pressure washed; and
  - Altered so they cannot be reused
- Where available, empty herbicide containers can be returned to the herbicide supplier as part of their recycling program, or disposed of in a permitted sanitary landfill or other approved disposal site;
- Any leftover herbicide mix should be saved for future use and stored in a manner consistent with the storage requirements specified in Section 6.4, Procedures for Safely Storing Herbicides.

For more information on how to dispose of unwanted pesticides, and empty containers, visit <a href="https://www.cleanfarms.ca">www.cleanfarms.ca</a>

#### **6.8 Procedures for Responding to Herbicide Spills**

Spill treatment equipment will be ready and available at storage facilities (including mobile storage), mixing, loading and application sites, and will include the following:

- Personal protective equipment, as recommended on the respective pesticide labels;
- Absorbent material such as sawdust, sand, activated charcoal, vermiculite, dry coarse clay, kitty litter or commercial absorbent;
- Neutralizing material such as lime, chlorine bleach or washing soda;
- Long handled broom, shovel, and waste-receiving container with lid; and
- A copy of an approved spill response plan will be available at each work site. All personnel working on a project involving pesticides must be familiar with its contents. If contractors that work under this PMP have their own spill response plan, it must meet or exceed the contents of this plan.

The following procedures must be followed if a spill occurs:

- All personnel will be protected from pesticide contamination by wearing appropriate protective clothing and safety gear;
- Any person exposed to a pesticide will be moved away from the place of the spill and kept warm. First aid will be administered, if required;
- The source of the spill will be stopped;
- The spilled material will be stopped from spreading by creating a dam or ridge;
- The project supervisor will ensure operations cease until the spill is contained and the source is repaired;
- Absorbent material will be spread over the spill, if applicable, to absorb up any liquid;

- The absorbent material will be collected into garbage bags or containers, with the contents clearly marked;
- Contaminated soil or other material will be removed from the spill site and placed in garbage bags or containers;
- Where the pesticide involved in the spill results or may result in its release into the environment, or more than 5 litres of herbicide are spilled, the person responsible for the product will immediately report it to the Provincial Emergency Program by telephoning 1-800-663-3456 or, where that is impractical, to the local police or nearest detachment of the RCMP; and,
- The BCER will be notified of the details related to the spill as soon as is practical by the contractor.

The following contacts are available 24 hours a day, and can be used for assistance in a spill:

- BCER and the Provincial Emergency Program (PEP): 1-800-663-3456 9 (via Emergency Management and Climate Readiness);
- Medical Emergency: 911; and
- BC Poison Control Centre: 1-800-567-8911

#### 6.9 Procedures for Maintaining and Calibrating Herbicide Application Equipment

All equipment used under this PMP will be safe for use, in good repair, and be the appropriate tool for the chosen herbicide. The contractor is responsible for maintaining and calibrating their equipment prior to use.

The contractor, at a minimum, will follow these instructions:

- Daily visual inspections of all equipment including hoses, connections, nozzles, pumps, etc.;
- Keep a record for each piece of application equipment showing when it was calibrated and the data upon which the calibration was based;
- Calibrate application equipment at the beginning of the year and at regular intervals throughout
  the season to ensure conformance to the application rates on the pesticide label. Calibration
  techniques are found in the BC Pesticide Applicators Handbook or are provided from the equipment
  manufacturer;
- If inconsistent spray patterns become apparent, or if a mixed tank is not covering as much ground as it should, check the calibration and replace faulty equipment as needed;
- For boom sprayers and controlled droplet boomless sprayers, use a "dry-run" method of checking
  calibration by operating the sprayer with water only over a dry gravel or pavement area and then
  looking for differences in drying time over the pattern. This may indicate faulty or plugged nozzles;
- Replace parts that are prone to failure, and carry spares; and
- Implement a regular maintenance schedule on each piece of equipment following the operator's manual. If the operator's manual is not available for a piece of equipment, maintain the equipment to generally accepted standards.

#### **6.10 Procedures for Monitoring and Adjusting to changing Weather Conditions**

Contractors will check the product label for guidelines for applying herbicides under various weather conditions, as well as monitor the current weather, meteorological conditions, and forecasts for the

geographic area via local radio stations, and/or reputable websites such Environment Canada.

Before and during herbicide application, personnel will record and consider the effects of the following:

- Precipitation;
- Wind (both speed and direction);
- Temperature; and
- Any other abnormal weather event, such as snow, frost, etc.
- Herbicide application must stop if:
- The maximum temperature stated on the herbicide label is exceeded;
- The wind speed and/or direction cause the handgun or backpack application of herbicide to drift and/or miss the target vegetation; or
- It begins to rain, increasing the chances of excessive runoff and/or leaching.

#### **6.11 Posting of Treatment Notices**

Treatment Notices will be posted in access locations and areas where they are clearly visible and legible for employees, the public and contractors. The signs will be posted for 2 weeks after herbicide application and include the following information:

- The trade name and active ingredient of the herbicide that will be used;
- The date and time of the application;
- The purpose of the treatment;
- Precautions to take to prevent harm for people entering the treatment area;
- The PMP confirmation number;
- The plan holder(s) contact information.

The Treatment Notice sign shall be:

- A minimum of 550 cm<sup>2</sup>;
- Water resistant;
- Display the title "Notification of Herbicide Application" in bold letters which are clearly legible to people approaching the area.

An example of the Treatment Notice is available in Appendix F.

## 7.0 Reporting, Notifications and Consultation

#### 7.1 Reporting

Accurate record keeping allow the BCER to monitor the quantity of pesticides used, and to ensure compliance with the IPMA and IPMR, the commitments made in this PMP, and the contents of the Pesticide Use Notice. The BCER will ensure that each of the required records described below are maintained.

#### 7.1.1 Confirmation Holder Use Records

Section 37(1) of the IPMR describes the requirements for these records. The following records must be kept for each treatment location and day of use:

- The date and time of the pesticide use;
- The name of the pest targeted by the use or the purpose of the pesticide use;
- The trade name of each pesticide used and its registration number under the federal Act;
- For each pesticide used, the method and rate of application and the total quantity used;
- The prevailing meteorological conditions including temperature, precipitation and velocity and direction of the wind. These conditions should be measured before starting treatment, re-measured if notable changes to the weather occur, and re-measured at the end of any treatment day;
- Any additional safety information or advice provided to the BCER by the applicator regarding the control method used; and
- A record for each piece of the holder's pesticide application equipment that requires calibration showing when the equipment was calibrated and the data upon which its calibration was based.

#### **7.1.2** Annual Report for Confirmation Holders

In accordance with Section 39 of the IPMR, the BCER will provide the following information prior to Jan 31 in the next calendar year to the Integrated Pest Management Branch for operations conducted under this PMP during the calendar year:

- The name and address of the confirmation holder, and their confirmation number;
- Trade name and active ingredient of the pesticide(s) applied, including their PCP numbers;
- Total area treated; and,
- Quantity of each active ingredient applied in kilograms.

#### 7.2 Notifications

#### 7.2.1 Notification of PMP Confirmation

Within 7 days of receiving confirmation of the PMP, the BCER will post to their website a copy of the confirmation and the completed PMP with relevant maps. You can view this at <a href="Orphan Sites">Orphan Sites</a> | BC Energy Regulator (BCER) (bc-er.ca)

#### 7.2.2 Annual Notice of Intent to Treat (NIT) as Confirmation Holder

As per section 42 of the IPMR, for the purpose of an annual Notice of Intent to treat, the BCER will prepare and retain a detailed map showing the treatment locations for the applicable calendar year, which indicate the following for each treatment location:

- The proposed treatment areas;
- The geographic features that require a pesticide-free zone or a no-treatment zone.
- The BCER will forward, in writing, to the BC Ministry of Environment, at least 21 days prior to treatment in each year during which the PMP is in effect, an NIT which will identify:
- Name and business location of confirmation holder;
- Proposed treatment areas;
- Proposed treatments;

- Pesticides proposed for use and their method of application; and,
- The total area proposed for treatment.

#### 7.2.3 Notification of Contraventions

If the BCER believes that they, as confirmation holder, their contractor, or another person has contravened the IPMA or it's regulation in a manner involving the release of pesticide into the environment, the confirmation holder must give written notice to the administrator as soon as practicable.

In addition, the BCER has implemented contractor guidelines to ensure compliance. Failure of the contractor to observe the following requirements may be cause for contractor dismissal:

- Violation of the requirements of the IPMA or the IPMR;
- Failure to use adequate personal protective equipment when required by the product label;
- Application of pesticides by uncertified personnel without appropriate supervision;
- Mixing of chemicals in inappropriate locations such as near environmentally sensitive zones;
- Application of pesticides under inappropriate or unsafe conditions;
- Application of treatment chemicals within prohibited zones;
- Improper cleanup or reporting of spills;
- Improper disposal of unused chemicals or containers;
- Improper equipment calibration;
- Failure to properly complete and submit daily operating logs or records; or,
- Handling, storing, mixing, transporting, or applying pesticides in a manner that violates product labels.

#### 7.2.4 Requests to Amend the PMP

Proposed amendments to this PMP will be provided in writing to the Ministry of Environment. Amendments to add new application techniques or similar changes will not require further public advertising or Indigenous consultation, provided the amendments are for use on lands managed by the BCER.

Amendments to add new active ingredients will require further public advertising and/or Indigenous consultation.

#### 7.3 Consultations

#### 7.3.1 Public Consultation Plan

Prior to submitting a Pesticide Use Notice to the Ministry of Environment for PMP confirmation, the BCER will carry out a consultation process with the public and individuals adjacent to Orphan property potentially significantly affected by the PMP.

The objectives of conducting consultations when this PMP is at the draft stage are:

- To increase public awareness of the PMP process and of the principles of IPM which are embodied in the PMP;
- To ensure that the public have an opportunity to identify concerns, and for the BCER to address those concerns, before the PMP is finalized and submitted and a Pesticide Use Notice submitted for

confirmation;

- To ensure a transparent and accountable review process for the PMP;
- To educate the public on the need to manage problem vegetation, noxious weeds and invasive plants; and,
- To explain how the planning process that is described in the PMP recognizes the need to protect human health and the environment.

For a minimum of three days per week for two consecutive weeks, communities and the public near treatment areas will be consulted of the PMP development via notices in local digital media news websites throughout the BCER service area. The notice will also include a link to a website where the Pest Management Plan is accessible for public viewing.

Communities or individuals adjacent to Orphan sites significantly affected by the PMP will be directly forwarded written notice of the development of this PMP, prior to submitting a Pesticide Use Notice.

The BCER will continue to engage and consult with Indigenous communities, the public, landowners, and stakeholders throughout the life of the PMP.

During the public consultation process, the draft PMP will be accessible via the BCER Orphan website at Orphan Sites | BC Energy Regulator (BCER) (bc-er.ca)

#### 7.3.2 Public Consultation Report

The BCER will prepare a Public Consultation Report that contains:

- A summary of public consultations, including the names and addresses of those who provided input, the nature of their concerns and/or recommendations, and the BCER response to the input from the public; and,
- A list of digital media outlets in which notification of the pending PMP submission appeared, along with the dates of posting, and print out of the notice posted in the local digital media news outlets.

#### 7.3.3 Indigenous Communities Consultation Plan

In addition to the objectives for public consultation outlined above, the BCER will consult with Indigenous communities to avoid infringement on Indigenous rights, treaty rights, or cultural values during the vegetation management program. Consultation is also undertaken to request authorization to undertake pesticide applications on federal reserve lands.

The BCER Indigenous consultation plan is outlined below:

- Develop a draft pest management plan (this document) that incorporates all related government policies, procedures, standards, and information into a single, comprehensive document that incorporates the principles of IPM as the basis for decision making options;
- Deliver an introductory letter including information regarding the PMP and program, and make the PMP available to Indigenous communities, inviting their input into the development of the plan and provide the PMP draft, and Orphan site shapefiles, and if requested, meet with them in person;

- Provide the Ministry of Environment a summary of consultation with Indigenous communities, including the names and addresses of those that provided input, the nature of their concerns and/or recommendations, and the BCER response to the input from the Indigenous communities; and,
- Indigenous communities will receive three contact efforts unless they have had prior contact and questions have been satisfied.
- Submit a Pesticide Use Notice to the Ministry of Environment confirmation of the PMP

#### **Indigenous Communities Consultation Report**

In order to facilitate Ministry consideration of the adequacy of Indigenous community consultation and of the BCER response to any issues raised, the BCER will prepare a report that describes the consultation process and outcomes. This report will be submitted to the Administrator, IPMA, in conjunction with the submission of the Pesticide Use Notice application, and Annual Notice of Intent to Treat.



## **Appendices**

The following is a list of appendices included in this PMP.

Appendix A: BCER Service Area of Pest Management Plan

Appendix B: Site Data Sheet and Management Plan

Appendix C: Herbicide Groupings, modes of actions, and effects of use

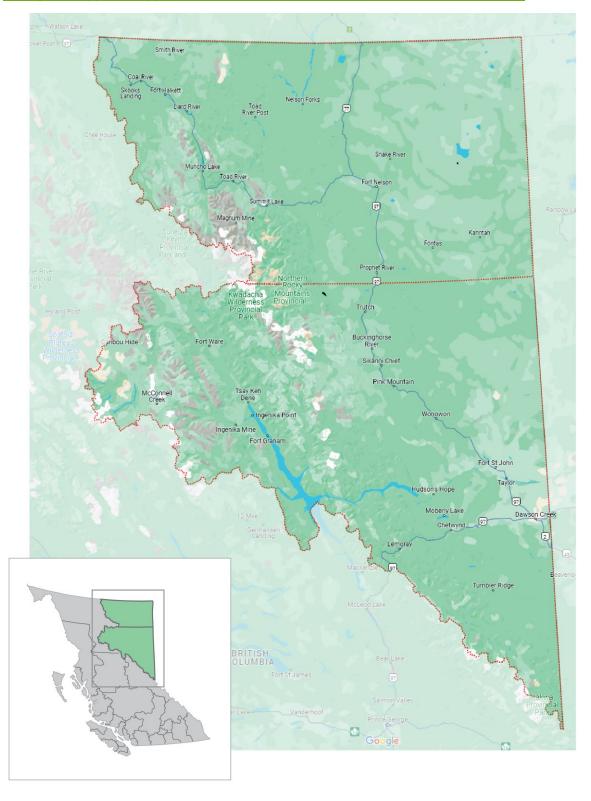
Appendix D: Herbicide listed by groups, including active ingredients and common trade names

Appendix E: Example of a chemical storage sign Appendix F: Example of a site treatment sign Appendix G: Post-Treatment Inspection Report



#### Appendix A Orphan Service Area of Pest Management Plan

The map below illustrates the working area of the PMP within the province of British Columbia. For a more detailed view or to view individual sites, visit the Orphan site web map at: <a href="https://geoweb-ags.bc-er.ca/portal/apps/webappviewer/index.html?id=a93cadbbd1044b148d0deb8f7f3ee59f">https://geoweb-ags.bc-er.ca/portal/apps/webappviewer/index.html?id=a93cadbbd1044b148d0deb8f7f3ee59f</a>



## **Appendix B: Sites Site Data Sheet and Management Plan**

| Target Species        | Growth<br>Stage      | Density/Percent Cover/ appropriate) |     | Exceeds Threshold? |
|-----------------------|----------------------|-------------------------------------|-----|--------------------|
|                       |                      | орр. оргасој                        |     |                    |
|                       |                      |                                     |     |                    |
|                       |                      |                                     |     |                    |
| NVIRONMENTAL CO       | <b>ONSIDERATIONS</b> |                                     |     |                    |
| Soil type and moistur | e content:           |                                     |     |                    |
| Aspect:               | S                    | lope:                               |     |                    |
| Water Sources or we   | lls within 30 m o    | f site                              | YES |                    |
|                       |                      |                                     | NO  |                    |
| f yes, describe:      |                      |                                     |     |                    |
| Bodies of water withi | n 20 m of site       |                                     | YES |                    |
|                       |                      |                                     | NO  |                    |
| If yes, describe:     |                      |                                     |     |                    |
| Other Environmental   | Features Requir      | ing Protection                      | YES |                    |
|                       |                      |                                     | NO  |                    |
| f yes, describe:      |                      |                                     |     |                    |
| Recommendations fo    | r additional mor     | nitoring/treatment:                 |     |                    |
|                       |                      |                                     |     |                    |
|                       |                      |                                     |     |                    |

Appendix C: The Mode of Action, Site of Uptake and Symptoms of Different Herbicide Groups

| Group | Mode of Action   | Site of<br>Uptake | Residual   | Effects on Grass   | Effects on<br>Broadleaf  |
|-------|--|-------------------|--|--|--|
| None  | Acetic and Citric acid   | Foliar            | None   | Foliar contact resuburndown of annusumpression (top gother herbaceous peren  | ual weeds and growth reduction) of   |
| 1     | Systemic; These chemicals block an enzyme called ACCase. This enzyme helps the formation of lipids in the roots of grass plants. Without lipids, susceptible weeds die.  | Foliar            | Minimal<br>to none                                   | Reduced growth, yellowing of growing point in 1 to 3 weeks. Newest leaf of affected plant pulls out easily in 3 to 5 days. | Tolerant   |
| 2     | Systemic; ALS/AHAS inhibitors. These chemicals block the normal function of an enzyme called acetolactate (ALS) actohydroxy acid (AHAS). This enzyme is essential in amino acid (protein) synthesis. Without proteins, plants starve to death. | Foliar/Soil       | Yes  | Newest leaves yellowed in 3 to 10 days, dead in 1 to 3 weeks.  | Newest growth discolored (red/yellow/purple) and/or miniaturized; the whole plant is involved in 1 to 3 weeks. |
| 3     | Systemic; Microtubule assembly inhibitors. These chemicals inhibit cell division in roots  | Soil              | Yes  | Reduced emergence, poor root development of emerged plants. Roots often swollen/stunted and root tips darkened.            | Reduced<br>emergence, poor<br>root development<br>of emerged<br>plants.  |
| 4     | Systemic; Synthetic auxins. These chemicals disrupt plant cell growth in newly forming stems and leaves; they affect protein   | Foliar            | Product<br>specific.<br>Check label<br>prior to use. | Tolerant to<br>moderate rates.<br>High rates cause<br>symptoms<br>similar to<br>drought.                                   | Abnormal growth (twisted stems, cupped leaves) in 2 to 10 days.  |

| Group | Mode of Action  | Site of<br>Uptake                         | Residual   | Effects on Grass   | Effects on<br>Broadleaf  |
|-------|---|---|--|--|--|
|       | synthesis and normal cell division, leading to malformed growth and tumours.  |   |  |  |  |
|       | Systemic and contact; Photosynthetic inhibitors at  | Soil<br>(Systemic)                        |  | Wilted and yellowed beginning at leaf madays.  | d oldest leaves<br>argins, death in 7 to 10  |
| 5     | Photosystem II, Site A. These chemicals interfere with photosynthesis and disrupt plant growth, ultimately leading to death.                  | Foliar<br>(Contact)                       | Product<br>specific.<br>Check label<br>prior to use.   | Yellowed oldest<br>leaves, death<br>within days.   | Yellowed/bleached<br>oldest leaves<br>where spray<br>contacts, death<br>within days. |
| 6     | Contact; Photosynthetic inhibitors at Photosystem II, Site II.  | Foliar                                    | Minimal to none  | Some leaf tip<br>burn or white<br>tissues possible.  | Yellowed leaves in 2 to 4 days, death in 1 to 2 weeks.                               |
| 9     | Systemic; Inhibitors of EPSP synthesis. These chemicals inhibit the amino-acid synthesis.   | Foliar                                    | None   | Wilted, yellowed lea<br>Newest growth is in<br>the rest of the plan  | pacted first followed by   |
| 10    | Contact; Inhibitors of glutamine synthetase.  | Foliar                                    | Product<br>specific.<br>Check label<br>prior to use    | Wilted, bleached lea<br>in 1 to 2 weeks.   | eves in 3 to 5 days, death   |
| 13    | Systemic; Inhibits DOXP, which is needed in plant metabolism.   | Soil                                      | Yes  | Bleached leaves, sus<br>shortly after emerge   | sceptible seedlings die<br>ence.   |
| 14    | Contact and systemic;<br>Inhibits an enzyme of<br>chlorophyll and heme<br>biosynthesis.   | Foliar<br>(Contact)<br>Soil<br>(Systemic) | Herbicide<br>specific.<br>Check label<br>prior to use. | Some leaf burn at contact points or leaf edges.  Bleaching and yellowing endyellowing endyellowi | Leaves yellowed and desiccated in 1 to 3 days. wing, death prior to or nergence      |
| 15    | Systemic; Lipid synthesis inhibitors (not ACCase inhibition). These chemicals inhibit the cell division and elongation in the seedling shoots | Soil                                      | Yes  |  | , ,  |

| Group | Mode of Action  | Site of<br>Uptake | Residual   | Effects on Grass  | Effects on<br>Broadleaf   |
|-------|---|-------------------|--|---|---|
|       | before they emerge above ground.  |                   |  |   |   |
| 20    | Systemic; Auxin<br>transport inhibitor<br>allowing buildup in<br>the meristem area  | Soil              | Yes  | Twisting of older lea   | ives, new leaves fail to<br>in 2 to 4 weeks.  |
| 22    | Contact; Cell membrane disrupters. Chemicals that disrupt the internal cell membrane and prevent the cells from manufacturing food.               | Foliar            | Minimal to<br>none. Check<br>label prior to<br>use.    | Leaves wilted within hours, desiccated in 1 to 3 days.  | Leaves wilted in 1<br>to 3 days,<br>desiccated and<br>dead in 3 to 7<br>days.       |
| 26    | Contact; Inhibitors of several plant processes including biosynthesis of fatty acids, lipids, and proteins. Photosynthesis also may be inhibited. | Foliar            | None   | Immediate cessation of growth, rapid desiccation of new leaves and purpling and yellowing of older tissues. | Abnormal growth (twisted stems, cupped leaves) in 2 to 10 days.                     |
| 27    | Systemic; Inhibits plant pigment biosynthesis and photosynthesis.   | Foliar            | Herbicide<br>specific.<br>Check label<br>prior to use. | Some bleaching and whitening of leaves.   | Leaves bleached<br>and whitened in 2<br>to 10 days and<br>death in 7 to 10<br>days. |
| 29    | Systemic; Inhibits cellulose biosynthesis   | Soil              | None   | Seedlings fail to em  | erge  |

Appendix D: Herbicide listed by groups, including active ingredients and common trade names

| Herbicide Group | Active ingredients      | Common Trade Names              |
|-----------------|-------------------------|---------------------------------|
| NA              | Acetic Acid             | EcoClear                        |
|                 | clodinafop propargyl    | Aurora, Horizon NG              |
|                 | fenoxaprop-p-ethyl      | Puma Advance, Tundra            |
|                 | quizalofop-p-ethyl      | Leopard, Assure II              |
| Group 1         | clethodim               | Ninja Master, FBN Clethodim 240 |
|                 | sethoxydim              | Poast Ultra                     |
|                 | tralkoxydim             | Bison, Liquid Achieve           |
|                 | pinoxaden               | Avenza, Axial                   |
|                 | AC 299, 263 120 AS      | Altitude FX3                    |
|                 | imazamox                | Solo/Solo Ultra Q, Viper        |
|                 | imazamox + imazethapyr  | Ninja Master, Odyssey           |
|                 | imazapyr                | Arsenal, Quasar                 |
|                 | imazethapyr             | Kamikaze, Pursuit               |
|                 | flucarbazone sodium     | Everest 3.0 AG, Inferno Duo     |
|                 | propoxycarbazone sodium | Olympus                         |
|                 | chlorsulfuron           | Telar                           |
|                 | ethametsulfuron methyl  | Muster                          |
| Croup 2         | halosulfuron            | Permit                          |
| Group 2         | metsulfuron-methyl      | Ally Toss-N-Go, Escort          |
|                 | nicosulfuron            | Accent                          |
|                 | rimsulfuron             | Hinge, Prism                    |
|                 | thifensulfuron-methyl   | Barricade II, Retain SG         |
|                 | tribenuron-methyl       | Aviator II, Express Pro         |
|                 | triflusulfuron methyl   | UpBeet                          |
|                 | halosulfuron            | Permit                          |
|                 | florasulam              | Broadband, Deathstar II         |
|                 | pyroxsulam              | Exhilarate, Rexade              |
|                 | thiencarbazone-methyl   | Predicade, Varro                |
| Group 3         | ethalfluralin           | Edge, Advantage                 |
| Group 5         | trifluralin             | Bonanza, Treflan                |
|                 | dicamba                 | Banvel II, Oracle               |
|                 | aminocyclopyrachlor     | Navius FLEX, TruRange           |
|                 | fluroxypyr              | Battlestar, Deathstar II        |
|                 | quinclorac              | Clever, Ingenious               |
| Group 4         | aminopyralid            | Reclaim II, Milestone           |
|                 | clopyralid              | Lontrel 360, Curtail M          |
|                 | halauxifen              | IPCO Exhilarate, Rezuvant XL    |
|                 | picloram                | Grazon XC, Tordon 22K           |
|                 | 2,4-D (Ester and Amine) | 2,4-D, Grazon XC                |

| Herbicide Group | Active ingredients   | Common Trade Names                    |
|-----------------|----------------------|---------------------------------------|
|                 | dichlorprop (2,4-DP) | Desormone, Estaprop XT                |
|                 | 2,4-DB               | 2,4-DB, Caliber 625                   |
| Group 4         | MCPA                 | MCPA, Curtail M                       |
|                 | МСРВ                 | Clovitox Plus, Tropotox Plus          |
|                 | mecoprop (MCPP)      | Mecoprop-P, Sword                     |
|                 | desmedipham          | Betamix ß                             |
|                 | phenmedipham         | Betamix ß                             |
|                 | atrazine             | Aatrex, Primextra II Magnum           |
| Group 5         | simazine             | Princep Nine-T                        |
|                 | hexazinone           | Velpar DF CU                          |
|                 | metribuzin           | Meteor Sencor 480 F, Sencor 75 DF     |
|                 | bromacil             | Hyvar X/X-L, Krovar I                 |
| Craun C         | bentazon             | Broadloom, Hurrican                   |
| Group 6         | bromoxynil           | Buctril M, Leader                     |
| Group 9         | glyphosate           | Roundup, Start-Up                     |
| Group 10        | glufosinate ammonium | Advantage, Liberty                    |
| Group 13        | clomazone            | Caravel, Command Charge               |
|                 | carfentrazone        | Aim, Prospect                         |
|                 | flumioxazin          | Chateau, Fierce                       |
| Group 14        | pyraflufen-ethyl     | Blackhawk, ThunderHawk                |
|                 | safllufenacil        | Heat, Smoulder                        |
|                 | acifluorfen          | Hurricane, Ultra Blazer               |
|                 | EPTC                 | Eptam                                 |
| Group 15        | triallate            | Avadex Liquid EC, Fortress MicroActiv |
| Group 15        | metolachlor          | Dual II Magnum, Metallica             |
|                 | pyroxasulfone        | Authority Supreme, Focus              |
| Group 16        | ethofumesate         | Nortron                               |
| Group 20        | dichlobenil          | Casoron                               |
| Group 22        | diquat               | Advantage Diquat, Reglone Desiccant   |
| Group 26        | Pelargonic Acid      | Beloukha                              |
|                 | pyrasulfotole        | Infinity FX, Tundra                   |
| Group 27        | topramezone          | Certitude, Impact                     |
|                 | tolpyralate          | Shieldex 400SC                        |
| Group 29        | Indaziflam           | Alion, Esplanade SC                   |



## **NOTICE OF PESTICIDE USE**



For emergency medical information contact:

B.C. Drug and Poison Information Centre 1-800-567-8911 or 604-682-5050

BCER Orphan PMP 2024-2029

## Appendix G: Example of a Post-Treatment Inspection Report

| Target Plants Treated (sp |  | t Treatment Evaluation                  |
|---------------------------|--|---|
|                           | pecies or complexes):                          |   |
| Freatment Location (atta  | ach map or diagram if needed)                  |   |
| Total Area treated:       |  |   |
| Non-Chemical Treatmen     | ts Used: YES 🗆 NO 🗆                            | 1                                       |
| Treatment Method:         |  |   |
| Pesticide Applied:        | YES □ NO □                                     |   |
| Product Name              | Active Ingredient PCP N                        | umber Application Rate (L/ha)           |
|                           |  |   |
|                           |  |   |
| Application Method and    | Type of Application Equipment:                 |   |
| EVALUATION                |  |   |
|                           |  |   |
| Evaluation Site Location  | and Features (e.g., slope, aspect, soil type): |   |
| Applicator Observations   | at Time of Treatment: (e.g., equipment pro     | blems, uniformity of treatment, drift): |
| Post-treatment Data on    | Abundance of Pest Plants: (e.g., counts or e   | stimates per unit area):                |
|                           | g., reduction in % cover/density of unwante    | ed plants compared to pre-treatment     |
| conditions):              |  |   |
| Conclusions on Success o  | of Treatment:                                  |   |
| Recommendations to Im     | prove Effectiveness:                           |   |
| Features/biota Examine    | d for Non-target Impacts:                      |   |
|                           | Observed:                                      |   |
| Environmental Impacts (   |  |   |