

Cushman & Wakefield *Green* Operations & Maintenance Practices

Integrated Pest Management Policy

1.0 Intent

While pests pose significant problems for people, property, and the environment, the pesticides used to solve these problems bring risks as well. C&W has adopted an Integrated Pest Management (IPM) Policy in order to protect the surrounding environment, maintain a healthy indoor environment for all building occupants and site personnel, and to minimize the costs of pest management. IPM is a process for achieving long-term, environmentally sound pest suppression and prevention through the use of a wide variety of technological and management practices. The IPM approach is intended to reduce the need for chemical application.

Implementation of the policy must include the following:

1. Review and understand the policy.
2. Determine to what extent the policy can be implemented within your portfolio, building or facility.
3. Discuss pertinent policy issues with the appropriate service suppliers/vendors.
4. Determine if there are any major impacts to the current building operations or additional costs associated with the implementation of the policy.
5. Develop written implementation plans along with the policy and discuss them with your client or building ownership (i.e. cost impact, changes in operation, notification to occupants).
6. Obtain client approval in writing.
7. Assign a responsible party for the policy.
8. In the event that a property is unable to implement the policy or parts of the policy, supporting documentation outlining the reasons for non-compliance should be maintained on file. The elements of this policy will be incorporated into the C&W Quality Assurance Review (QAR) process.

Please note that the approaches described in each of the “green” policies constitute a baseline. Individual facilities/properties are encouraged to further enhance the policies as appropriate in consultation and approval with your respective clients and building ownership.

The policy will be periodically reviewed and updated as required. Notification will be provided as updates occur.

2.0 Scope

For the purpose of this IPM Policy, pests are living organisms (animals, plants, or microorganisms) that interfere with the intended building function and/or the behavior of its occupants. The pest species and the degree to which that population poses a threat to the occupants and/or structure will determine the strategy(s) for best managing that particular pest population.

The policy establishes service requirements and scheduling for suppliers/vendors who handle pest control. The Policy further provides IPM procedures with control strategies that are intended to reduce the need for chemical application, and guidelines for rodent and insect control, and for the application of pesticides.

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C&W will continually evaluate the effectiveness and safety of the measures outlined in this Policy. The supplier/vendor should be required to adjust their service practices to adhere to C&W's IPM Policy.

3.0 Policy

The U.S. Green Building Council's (USGBC) [LEED EB: O&M rating system](#) was used as a framework of reference for the C&W IPM Policy. Please note that the LEED certification requirements may include more stringent application and documentation.

Effective Date: M/D/Y

Responsible Party:

Service Requirements

Responsible Party:

Supplier/Vendors and parties who apply pesticides must comply with all of the IPM specifications in this Policy as well as any local, state or federal laws, codes or regulations. Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides and must follow all of the specifications in this policy. The supplier/vendor will furnish all supervision, labor, materials, and equipment necessary to accomplish the monitoring, trapping, pesticide application, and pest removal components of the IPM program. The supplier/vendor shall also provide detailed, site-specific recommendations for structural and procedural modifications to aid in pest prevention. Contractor should provide records on the number of pests or other indicators of pest populations both before and after any treatments.

Contractor Service Schedule and Conduct

Responsible Party:

Routine pest control visits must not disrupt occupant productivity nor pose a threat to occupant health or well being. If pest control visits must occur during the hours of building occupancy, the supplier/vendor will take care to ensure minimal disruption. The supplier/vendor will observe all safety precautions throughout the performance of the contract. Federal, state, and local safety and health requirements must be observed at all times. Where there is a conflict between applicable regulations, the most stringent will apply.

Integrated Pest Management Procedures

Responsible Party:

IPM Control Techniques:

The supplier/vendor will use the following four techniques as appropriate:

- A. Environmental Controls: Such controls entail the intentional manipulation of the environment in order to reduce pest's accessibility to food, water and shelter. Such control is attributed to the building occupants' conscientiousness regarding a tidy and sanitary working environment. Sanitation is crucial to pest prevention; if an environment is sanitary, the pest does not have the crucial means for survival, is vulnerable and will either die or leave. While environmental control is a powerful prevention technique, if an area is already infested, the following techniques may be needed to rid the area of the pests:
 - a. Basic housekeeping
 - b. Storing food in insect-proof containers
 - c. Ensuring water drainage where mosquitoes might flourish
 - d. Frequent waste collection at both interior and exterior building collection locations and/or waste hauler loading zones
 - e. Proper maintenance or inspection of indoor plants
- B. Mechanical Controls: Without the use of chemicals, these controls are directed at destroying a pest and/or its habitat. This IPM policy specifies the proper use of the following techniques.
 - a. Traps – rat, mouse, insect, etc.
 - b. Removal of nests and/or webs
 - c. Sealing off cracks or crevices where insects and/or rodents may enter
- C. Organic Controls: Controls that are derived from organic compounds such as tree bark or flowers and comes in the form of oils or dusts can be highly effective in pest control.
- D. Chemical Controls: In general, chemical controls refer to pesticides that are used to kill infesting pests. Chemical control is the last resort for pest control in C&W managed facilities. This IPM policy specifies the handling, use and application of chemical controls.

Guidelines for Rodent and Insect Control

Responsible Party:

Rodents

- A. Trapping Devices: As a general rule, rodent control will be accomplished with trapping devices only. All trapping devices will be in protected areas and concealed from plain view so as not to be affected by routine cleaning and other operations. The locations of all trapping devices should be logged by the vendor in a supplier/vendor log, and made readily available to the C&W manager. The supplier/vendor is responsible for disposing of all trapped rodents and rodent carcasses in an appropriate manner.
- B. Rodenticides: When the supplier/vendor deem rodenticides as a necessary means for adequate rodent control inside the building, the supplier/vendor should notify C&W manager prior to the application any interior rodenticide treatment. All rodenticides, regardless of packaging, will be placed in an EPA-approved tamper-resistant bait box or a secure location that is inaccessible to children, pets, wildlife, and domestic animals and in full compliance with any applicable law or regulation.

- C. Bait Boxes: All bait boxes will be maintained in accordance with EPA regulations, with an emphasis on the safety of non-target organisms. The supplier/vendor will take care concerning the following:
 1. All bait boxes are placed out of the general view, in locations where they will not be disturbed by routine operations.
 2. The lids of all bait boxes are securely locked or fastened shut.
 3. All bait boxes are securely attached or anchored to floor, ground, wall, or other immovable surface.
 4. Bait is secured in the feeding chamber of the box instead of the runway or entryways of the box.
 5. All bait boxes are labeled on the inside with the supplier/vendor's business name and address, and dated at the time of installation and each servicing.

Insect Control

- A. Non-Pesticide Methods: The supplier/vendor will employ non-chemical methods of control wherever possible. Such methods may include: The use of trapping devices and vacuums rather than pesticide sprays as a means to cleanout cockroach, ant or other insect infestations.
- B. Monitoring: Sticky traps will be used to monitor and evaluate indoor insect control.
- C. Cracks and Crevices: As a general rule, the Supplier/Vendor will apply all insecticides as "crack and crevice" treatments only, meaning the insecticide is not visible to a bystander during or after the application process because it is concentrated and applied to the cracks and crevices only.
- D. Bait Methods: Bait application is the standard pesticide technology approach for cockroach and ant control. Supplier/Vendor will use bait as a method of insect control in all cases.
- E. Application of Insecticides to Exposed Surfaces: Application of insecticides to exposed surfaces or as space sprays is, in general an unacceptable method of treatment. If the Supplier/Vendor deems it necessary to employ such a technique, supplier/vendor must notify C&W manager in advance. No surface application or space spray will be made while occupants are in the building. In the case of such an application, the Supplier/Vendor and C&W will take all necessary precautions to ensure occupant and employee safety, and the containment of the pesticide to the site of application. Any method of application must be performed in full compliance with any applicable law or regulation.

Animal and Vegetation Pest Control (Outdoor)

Responsible Party:

Prevention is the preferred method of pest control. The pest species and the degree to which that population poses a threat to the occupants and/or structure will determine the strategy(s) for best managing that particular pest population.

- A. Where applicable, C&W will monitor and repair physical barriers to wild areas in order to prevent the entry of wildlife into landscaped areas.

- B. Where applicable, the supplier/vendor will minimize physical interface with wildlife using noise, scent or other repellents when physical barriers fail.
- C. Where applicable, the supplier/vendor will use repellents for gopher and moles instead of trapping.
- D. The supplier/vendor will monitor soil for compaction, lack of drainage, over watering, and depletion of organic matter.
- E. The supplier/vendor will maintain a clean landscaped and/or vegetated area, eliminate dead material, prune infected or unhealthy plant material, irrigate, fertilize and minimize elements that provide resources and/or habitat for pests.
- F. The supplier/vendor will maintain a balanced pest/predator population, monitor, and replenish predators as required. Examples of biological pest control usage include:
 - Predatory mites to control two spotted and red mites in pines.
 - Predatory nematodes to control brown grub in lawns.
 - Washing of trees to control mite and whitefly.
 - Ladybugs to control aphids.
- G. Landscape contractors will report and/or resolve pest issues when they appear. An example of a response to a pest problem is the removal of the infected plant or plant part, or the use low and no impact pesticides (i.e. agricultural soaps and oils).
- H. If the use of pesticides is required, the supplier/vendor will choose organic pesticides and/or safer soaps and castor bean oils when available and appropriate. The supplier/vendor will consider the range of treatments available and the lowest risk alternative when selecting a product for application. When chemical application is utilized, building occupants will be notified 72 hours in advance, as described in item E of the "Guidelines for Application of Pesticides" section below.

Guidelines for Application of Pesticides

Responsible Party:

The Supplier/Vendor is responsible for applying all pesticides according to the product instructions. All pesticides used by the Supplier/Vendor must be registered with the U.S. Environmental Protection Agency (EPA), state and/or local jurisdiction and applied in compliance of any federal, state or local laws, codes and regulations. The Supplier/Vendor will adhere to the following rules for pesticide use:

- A. **Approved Products:** The Supplier/Vendor will only use products as documented and identified in the service agreement.
- B. **Pesticide Storage:** The Supplier/Vendor will not store any pesticide product in C&W managed buildings.

- C. Application as Needed: Pesticide application will be on an as needed basis instead of by schedule. As a general rule, application of pesticides in any area should not occur unless the Supplier/Vendor has already monitored and inspected that area and found a reasonable need for chemical treatment. C&W manager must be notified prior to any pesticide application as a preventative measure.
- D. Minimization of Risk: When pesticide use is necessary, the Supplier/Vendor will apply the least hazardous material and use precise application techniques in order to use a minimal quantity of product.
- E. Universal Notification: The Supplier/Vendor will immediately notify C&W manager of the need for pesticide application. A date and time for this application will be determined by both parties. C&W will then notify building occupants or direct the Supplier/Vendor to do so within compliance of local law, code or regulations. In the absence of any governmental or specific occupant requirement, notification should be made at least 72 hours prior to pesticide application, under normal conditions. In the case of an emergency application, the same procedure as normal conditions will be followed except only 24 hours prior notice is required. All communications will be approved by C&W in advance of their distribution to building occupants.
- F. Pesticide Handling: Transport, handling, and use of all pesticides will be in strict accordance with the manufacturer's label instructions and all applicable federal, state, and local laws and regulations.

Cautionary Labeling for Pesticides

- Supplier/vendor must comply with any applicable laws and regulations requiring that precautionary statements and signal words be included on all pesticide labels. This does not apply to non-toxic or "natural" materials.

4.0 Additional Resources

Additional information on [IPM principles](#) is available on EPA's website.

The US EPA's [Greenscapes](#) program provides cost-efficient and environmentally friendly solutions for landscaping.