C.I.P 3.19

POLICY FOR COUNCIL USE OF PESTICIDES

IN PETERSFIELD

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Pesticide Policy - The use of Pesticides for Grounds Maintenance

1. Introduction

i. Petersfield Town Council aims to provide a high standard of grounds maintenance for all of its sites.

ii. These sites include Petersfield Heath, recreation grounds, sports fields, open spaces, play areas, commons, Nature Reserves and allotments.

iii. To achieve these high standards, in the past a heavy reliance has been made on the use of pesticides. This included herbicides, fungicides, and insecticides, collectively known as "pesticides".

iv. With the ever-increasing awareness of the environmental and undesirable effects of pesticides, both to the staff concerned with applying them, the general public and the environment as a whole, alternative methods are being identified and researched at all times, and strict controls are being made by the Council on those pesticides that are still being applied to our sites.

v. It is the aim of the Council to stop using pesticides, by a phased reduction of use on its land, although at present it may not always be possible to cut out the use of pesticide control altogether. The amount of pesticide used in parks, recreation grounds and open spaces within the town's sites is already very limited, and chemicals used are considered, with our current knowledge, as those that will have least effect on the environment.

vi. This policy for the use of pesticides identifies how we propose to reduce, monitor and control the use of pesticides, using alternative methods wherever possible.

vii. This policy relates to pesticides used in Petersfield Town Council owned parks and open spaces, but does not include land owned and maintained by East Hampshire District Council and Hampshire County Council. However, wherever possible we will encourage pesticide free / reduced pesticide use across the town.

2. Why do we still use pesticides at all?

i. Although every effort will be made to use non-chemical control, there will still be some areas where alternative methods are not currently available or effective. Wherever this is the case, integrated control will be practised wherever possible, i.e., a combination of cultural and pesticide use, to resolve a problem with the least effect on the environment.

ii. One of the main areas where pesticides will still be used will be for maintaining fine turf areas such as sports pitches. These areas are maintained to a high standard to allow the games to be played to a good standard. However, this use will be minimised and alternative methods used as a first choice where possible.

iii. The use of lumbricides (worm killer) will not be approved at any of our sites, due to its detrimental effect on the environment, unless future "environmentally friendly" control methods are developed.

iv. The use of pesticides will be permitted for the control of tree stump regrowth to restore and maintain valuable ecological grassland habitats and to stop the spread of invasive non-native trees. This will usually be in the form of pesticide plugs inserted into the stump. This may also be carried out for poisoning stumps following scrub clearance and for areas where stump grinding is not viable.

v. Fungicides, to prevent and remove fungal attacks on grass, will be permitted due to necessity. However, grounds maintenance improvements such as increased aeration/ brushing have and will continue to be increased in our grounds maintenance activities to reduce the occurrence of fungal attack and therefore reduce the need for fungicide application.

vi. Selective herbicides will be permitted for use on fine turf and sports pitches to control broadleaf weeds. Selective weed killing will only take place where there is weed growth affecting the use of the area for sports, and will not be applied when there is not a weed problem. However hand weeding where possible will always be encouraged.

vii. The maintenance of hard surfaces such as paths, garage blocks, highway weeds etc, on a large scale, may still require the use of herbicide where other methods cannot be used. However, when this operation is carried out, weeds will be individually targeted (reduced – volume spraying) by the applicator, therefore considerably reducing the amount of herbicide used, and preventing any excess herbicide being lost into the environment.

viii. The use of gas pellets and other pesticides to control moles on sports pitches has not been used for a considerable period of time. Alternative mechanical traps will be used where control is **absolutely** essential for Health and Safety of sports users.

ix. The only other occasion where pesticides will be applied is for one-off tasks. This may include where there is a particular weed problem with a shrub bed, where an area of land has to be cleared of perennial weeds for a particular purpose, or where an invasive weed, such as Japanese Knotweed, Parrots Feather, Giant Hogweed, Hemlock Water Dropwort etc has to be controlled.

On all these occasions, a pesticide will only be used if no alternative non pesticide option is suitable.

3. Environmental Considerations

i. The use of pesticides can have a devastating effect on our environment and its biodiversity.

ii. When used on hard surfaces, such as pavements, there is a possibility of run off or residues which can contaminate water courses and contaminate aquatic wildlife. They may kill plants which are beneficial and relied upon by birds, insects and other wildlife.

iii. When used on soft surfaces, such as vegetation or grass swards, there is a possibility of spray drift and contamination of adjacent areas.

iv. Many pesticides are highly persistent, meaning that they stay around in the soil for a long time, raising the likelihood that they could enter watercourses or aquifers.

v. Due to large scale habitat loss in the countryside, and large scale pesticide use in agriculture, wildlife such as birds, insects and bees are seeking refuge in our towns. This makes it very important that within our areas, we create safe, pesticide reduced, or ideally free, areas.

4. Alternatives to Pesticide use

i. Non chemical methods of pest / vegetation control will be used as a first choice wherever possible. The number of alternatives are currently limited, however with a growing trend towards reduced pesticide use, and with current concerns over the use of Glyphosate based products, it is likely that the number of alternatives will increase significantly in the future.

ii. A selection of alternative control methods is shown below:

Method	**Use**	**Advantages**	**Disadvantages**
Hot Foam	Weeds in hard surfaces Moss on hard surfaces and play area safety surfacing, Grass growth around trees, non chemical graffiti removal.	Foam holds hot water against plant. Pesticide free. Can be used in all weather. Kills 95% of targeted weeds.	New technology – needs refinement. Expensive to purchase Additional cost of plant oil extract, diesel consumption and pollution.
Hot Water / Steam	Weeds in hard surfaces, play area surfacing, non chemical graffiti removal.	Lower initial purchase cost.	Requires more treatments as heat is not held onto the plant. Diesel consumption and pollution.
Propane / Flame gun	Weeds on hard surfaces	Relatively cheap to purchase	Health and Safety Risks. Not particularly effective.
Manual Weeding	Weeds in general	Very effective if done well. Low set up costs (excluding labour).	Very time consuming. Requires large amount of labour

			which adds to the cost.
Mulching – bark and or membrane.	Weed control within shrub borders, under trees etc.	Improves appearance of the site and retains moisture in the soil to aid plant growth.	Can be labour intensive. May be expensive depending on supply of material.
Mowing and hand pulling	Undesirable weeds in sensitive natural habitats and on farmland	No licence required and no damage to the environment	Can be labour intensive to carry out and expensive for disposal of specific species
Nematodes	Control of pests such as slugs.	Can be very effective. Does not have the negative visual effect of slug pellets or potential harmful effect on wildlife.	Can be expensive.
Intensive grazing	Undesirable weeds in sensitive natural habitats and on farmland	Wildlife friendly with sufficient control	Not suitable for all ground conditions and can damage sensitive soils.
Vinegar based solutions	Weeds in hard surfaces	No licence required for application.	Has been trialled, but has not been effective. Strong smell, can give operator headache.

5. Pesticide Free Parks

i. The reasons for wishing to go pesticide free are numerous, but include:

a. Contamination of local water supplies

b. The potential impact of pesticides on human health, the environment, biodiversity and bee populations

c. Public concern

ii. The aim of creating pesticide free parks is to create areas which are safe for children, adults and wildlife. These parks will be sign posted as "Pesticide Free" so that everyone knows that they can use the parks safely. When weed or pest control is needed, only environmentally friendly solutions will be used.

As these parks will become safe havens for wildlife, wherever possible we will also promote the creation of wildlife friendly habitats and pollinator plants.

6. What pesticides will we use

i. We will continuously review the pesticides that we have to still use, taking into account trade literature reports and advisory reports from various bodies such as the Health and Safety Executive.

ii. We will refer to and use information provided by the Pesticides Action Network (PAN) and the e UK Pesticide Guide.

iii. Instances where the use of a pesticide *may* still be required after non chemical methods have been found to be unsuitable will include:

Control of weeds such as Knotweed, Hemlock Water dropWort, and Hogweed
Control of weeds where no other solution currently exists i.e. sports turf weeds
Control of weeds inaccessible by other solutions
Control of hazardous pests such as Brown tail moth caterpillar
Control of weed growth on highways and some housing areas.

7. Glyphosate

i. There is currently particular concern regarding Glyphosate weed killers, which are widely used on hard surfaces and to clear vegetative sites.

ii. In April 2015, the International Agency for Research on Cancer, part of the World Health Organisation, concluded that Glyphosate based weed killer was "probably carcinogenic to humans". Other studies have linked glyphosate to birth defects and a rise in antibiotic resistance.

iii. Glyphosate is a broad spectrum (non selective) weed killer that is an organophosphorus compound. It is supplied in many different forms, usually with other chemicals, such as spreaders, drift reducers, wetting agents etc added.

iv. Glyphosate is absorbed through the plants leaf's, and is absorbed into plant roots.

v. All products containing Glyphosate have to be registered and approved by the European Pesticides Commission.

vi. Glyphosate was re-registered and approved in June 2016, but for a limited period of 18 months (until the end of 2017). It has since had a further 5 year extension.

vii. By removing vegetation so effectively, the herbicide indirectly affects biodiversity through changes to ecosystems and food sources. Where Glyphosate, and other pesticides, are used, there are fewer food sources for insects, birds and animals in the urban environment.

viii. As part of this approval extension, the Commission also presented some recommendations to be considered by member states. One of these recommendations was to"*minimise the use of the substance (glyphosate) in public parks, public playgrounds and gardens"*

ix. The Pesticide Action Network (PAN) UK have a "precautionary principle" that states that *"When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some of the cause and effect relationships are not fully established scientifically".* In other words, although some evidence against the use of pesticides appears inconclusive, it is far better to work towards using less or ideally no pesticides.

x. In August 2018, a land mark case in the USA agreed with a groundsman's claim that his rare form of cancer was caused by exposure to a glyphosate based weed killer, and the company was fined a significant sum of money. This may well lead to future claims, and potentially, an increased effort in finding more environmentally friendly products to market.

8. How will we limit the effects of the pesticides that we do have to use

i. When approving and applying pesticides, we will:

- Use a method that uses/applies the least amount of chemical, i.e. CDA(Controlled droplet application), weed wipes, targeted spraying.
- Use the most efficient method of application.
- Where possible, not apply a blanket cover of chemical.
- Ensure that spare pesticides/containers are disposed of safely in an approved manner.
- Ensure that spray equipment is washed out in a safe manner according to the approved method, to safeguard the environment.
- Ensure that the application method is approved for the product used.
- NOT use any pesticides in children's play areas unless there is no other suitable means of action or pesticide free parks.
- Ensure that all pesticides are applied to the Council's specification standards.
- Leave a "pesticide free" buffer zone around environmentally sensitive areas where appropriate.

9. Who will apply pesticides?

i. Any person applying a pesticide to the Councils land will hold a Certificate of Competence (irrespective of age), as issued by the NPTC, appropriate to the type of equipment/spraying technique to be used.

ii. Copies of these certificates will be made available to the Council as evidence of competence.

iii. Pesticide applications, subject to approval, may be made by the following:

- Directly employed staff
- Grounds Maintenance Contractors
- Specialist Contractors.

10. Legal Requirements

i. Where it is necessary for pesticides to be applied on Council land, these will be applied in such a way that it conforms fully with the latest Health and Safety Legislation (primarily the Health and Safety at Work etc Act 1974 (HSWA)) and Pesticide Legislation (The Plant Protection Products (Sustainable Use) Regulations 2012 & Control of Pesticides (Amended) Regulations 1997).

ii. The Plant Protection Products (Sustainable Use) Regulations 2012 states that:

- all reasonable precautions are taken to protect human health and the environment;
- the application is confined to the area intended to be treated; and
- when used in public spaces that the amount used and frequency of use is as low as is reasonably practicable.
- suitable alternative methods of control are considered and used where appropriate to help minimise your use of chemicals.
- Pesticides will only be used in accordance with the statutory listings on the product label.
- Prior to application, full Risk Assessments/COSHH Assessments will be carried out, and a data sheet for the pesticide will be read and complied with.
- All those involved in approving/applying pesticides will be made aware of this Pesticide Policy.

11. Grounds Maintenance Specifications

i. To ensure that our contractors comply fully with our council's requirements, all grounds maintenance specifications will include detailed information of the council's pesticide policy, the requirements for pesticide free / pesticide reduced areas and for the conditions for the use of pesticides where essential. The use of pesticides will not be permitted in any contract unless no other suitable alternative is available.

ii. Any contracts issued in connection with any form of grounds maintenance will also always make reference to our Pollinator Strategy and its Environmental Policies.

12. Third party owners

i. Where we work on behalf of third parties, we will ensure compliance with this Pesticide Policy and the creation of pesticide free parks.

ii. Where weed control is carried out on behalf of a Highway Authority, we will continue to offer pesticide application services according to the clients requirements. This will allow us to:

- Ensure that the minimum amount of pesticide is used
- Ensure that the application is carried out by competent / trained staff
- Discuss alternative options with the client with the aim of agreeing ways to reduce pesticide application where possible, or to change the methods of weed control as new research / options become available.
- Monitor pesticide usage across the area.

13. How will we monitor the use of pesticides on our sites

i. Detailed and accurate spraying records will be kept.

ii. Contractors will be required to submit a proposed spraying sheet for approval to the client officer, prior to any pesticide being applied. This will describe the type of pesticide to be used, active ingredient, trade name, area where the pesticide is to be applied, rate of application, calibration, safety considerations, proposed date of application, operative who will be applying the pesticide etc.

iii. A detailed report will also be supplied to the client officer after application, confirming the above details, and including additional information such as weather conditions.

iv. The following records will also be kept and retained as required:

- Environmental Assessments.
- Local Environment Risk Assessment for Pesticides (LERAP).
- COSHH Assessments.
- Stock Control Records.
- Disposal records.
- Copies of certificates of Competence.