

FAREHAM

BOROUGH COUNCIL

Appendix A

DRAFT STREETSCENE SUSTAINABLE PESTICIDE USE POLICY



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Introduction

1. Throughout the UK, Europe, and the rest of the World there is a growing movement to phase out the use of pesticides which have traditionally been used as a cost-effective way to control weed, plant diseases, fungi, bacteria and insects.
2. This movement has been triggered by the growing public concern over the possible health effects on humans through exposure to pesticides, with particular concern over the impacts on children.
3. Equally there are also concerns over the effects that pesticide use is having on our environment and wildlife. The decline of bees and other pollinators, bird species, mammals, fish, and freshwater invertebrates have all been linked to pesticide use.
4. The level of public attention has increased significantly in recent years, since the debate over safety of the most widely used amenity herbicide Glyphosate, and the ongoing discussions about its use in public spaces.
5. In 2015, the International Agency for Research on Cancer (IARC) classified glyphosate as 'probably carcinogenic'. At the same time, the European Food Safety Authority (EFSA) concluded that it is unlikely to pose a carcinogenic hazard to humans.
6. In 2021, the EU Assessment Group on Glyphosate (AGG) concluded that glyphosate does not pose any hazard to human or environmental health.
7. Despite there being no clear outcome on the Glyphosate debate yet, public awareness has increased as a result and many people in the UK and across the world are calling for a more precautionary approach to be taken and for its use to be phased out.
8. Pesticides, also known as 'plant protection products' (PPP) are used to control pests, weeds, and diseases. Examples include insecticides, fungicides, herbicides, molluscicides, and plant growth regulators. They can exist in many forms, such as solid granules, powders or liquids and consist of one or more active substances co-formulated with other materials.
9. The Health & Safety Executive (HSE) is the national pesticides regulator for the UK, on behalf of the UK government and the devolved administrations. HSE aim to ensure that pesticides do not harm human health or have unacceptable effects on the environment by:
 - Enforcing the regulations.
 - Ensuring only authorised products can be marketed.
 - Ensuring products are used in a sustainable fashion.

- Monitoring the impact of chemicals.
10. Anyone applying for authorisation of a product must provide an extensive range of scientific and technical data. Through this data, they must demonstrate that the product is effective and humane and poses no unacceptable risks to people (including users, residents, and bystanders), wildlife and the environment. Only when the Government is satisfied with the above data can authorisation be granted for the product
 11. There is a Code of Practice for using Plant Protection Products. This code of practice is for all professional users of plant protection products in England and Wales in respect of Part III of the Food and Environment Protection Act 1985 (FEPA) and the regulations controlling pesticides. The Code's statutory basis means that it can be used in evidence if people are taken to Court for offences involving PPPs.

Background

12. The Council's Streetscene Scrutiny Panel received a presentation on the Council's Pesticide Treatment Programme at the meeting on 26 January 2023. Members of the Panel were very supportive of the suggestion put forward in the presentation that a policy be developed to regulate the Council's use of pesticides and to provide details of the measures being considered to reduce them.
13. On 20 April 2023 the Council received a petition submitted by Councillor Ms C Bainbridge on behalf of Conserving Habitats in Portchester (C.H.I.P), which requested that Fareham Borough Council ensure that, in public areas, it replaces the use of Glyphosate with chemical free weed removal methods, which are better for the environment and pose no risk to humans, wildlife and pets.
14. On 05 June 2023 the Council's Executive received a briefing paper on Streetscene Sustainable Pesticide Use. The contents of the paper were noted by the Executive.
15. The Streetscene Scrutiny Panel Chairman agreed that a report presenting the draft Sustainable Use of Pesticides Policy comes to the Panel for consideration and comment at the meeting to be held on 02 November 2023.

Policy Purpose

16. The purpose of this policy is to provide a sustainable method for weed control that will continue with the process already underway of reducing pesticide use on public land in Fareham, wherever possible. The goal being to eventually phase out pesticide use on Fareham Borough Council owned land completely as and when suitable sustainable alternative solutions can be found, other than in exceptional circumstances.

Policy Scope

17. The Council is responsible for significant areas of land in the Borough of Fareham and Streetscene is directly responsible for grounds maintenance, except where

this is leased to third parties. Sites include parks, recreation grounds, open spaces, cemeteries, churchyards, play areas, sports pitches, nature reserves, conservation areas, housing areas, car parks and woodlands.

18. Streetscene also manage the highway verges and landscaping on behalf of Hampshire County Council under the Agency Agreement between the two authorities. This does not include weed control on the highway which is the responsibility of Hampshire County Council.

Understanding Sustainability and Weed Control

19. The three interconnected pillars of sustainability are the economy, society, and the environment. Expanding this slightly in relation to this policy, the Council will seek sustainable solutions to provide economic viability, social equity, and environmental protection as the core principles in the transition to reducing the Council's use of Pesticides.
20. The need to control or manage weeds (plants growing in the wrong place) is a requirement for all involved in maintaining and developing amenity open space and sports facilities. Indeed, it is essential so that such areas can be kept safe, healthy, and fit for purpose.
21. On hard surfaces, excessive weed growth can create slip or trip hazards, on sports pitches impact on playing conditions and even in areas such as wildflower meadows, control of certain species is important to avoid competition problems. Effectively, weed management is an essential component of sustainability, protecting the environment, place, and people.

Why We Use Pesticides

22. The Council owns or is responsible for the maintenance of a large land holding across the Borough of Fareham which includes the grounds maintenance and countryside management operations that both use pesticide as part of the vegetation management control.
23. Although every effort is made to minimise chemical control and seek alternative methods, not all alternative methods are effective, and in some cases, alternatives are not yet available. Whenever this is the case, integrated control will be practised wherever possible, i.e., a combination of cultural and pesticide use, to minimise chemical application to achieve a sustainable outcome.

Pesticide Use by Fareham Borough Council's Streetscene Department

24. Streetscene use a range of pesticide products in public spaces including the herbicide Glyphosate to treat invasive species such as Japanese Knotweed.
25. Fungicides and herbicides not containing glyphosate are used to control disease and weed growth in fine turf sports surfaces such as bowling greens and cricket

squares. This is a necessary and currently cost-effective solution to maintain a playing surface that is fit for purpose.

26. Herbicides including glyphosate-based formulations are used to control plant growth around obstacles and street furniture in parks, cemeteries, open spaces, housing amenity areas and roadside verges.

27. The following tables show the chemicals that have been used (based on the last full year's data - 2022), what they are used for, where they are used and in what quantity per annum.

Grounds Maintenance

Product and (Type)	Active Substance (how applied)	Used For	Where used	Quantity Used Per Annum
Roundup Proactive (Herbicide)	Glyphosate (Knapsack sprayer & stem injection for knotweed)	Used for invasive species control and in preparations to eradicate pernicious weeds for meadow creation	Parks and open spaces	13.5 litres
Nomix Dual (Herbicide)	Glyphosate and Sulfosulfuron (Controlled droplet technology)	Control of vegetation around obstacles in grass and weeds on hard surface areas.	Highway verges, parks and open spaces, Housing land	64 litres
Nomix Hilite (Herbicide)	Glyphosate (Controlled droplet technology)	Control of vegetation in borders and cemetery headstrips	Cemeteries	7.5 litres
Dedicate (Fungicide)	Tebuconazole and trifloxystrobin. (Knapsack Sprayer)	Control of fungal infections in fine turf including Fusarium Patch, Red Thread, Dollar Spot and Leaf Spot	Parks Bowling Greens and Cricket Squares	½ litre (500ml)

Countryside

Product	Active Substance (how applied)	Used For	Where used	Quantity Used Per Annum
Roundup Proactive (Herbicide)	Glyphosate (Knapsack sprayer & stem injection for knotweed)	Used for weed control on surfaced paths, invasive species control and in preparations to eradicate pernicious weeds for meadow creation/restoration	Portchester Common, Warsash Common, Anson Grove, Coldeast Conservation Area	Less than 1 litre (800ml)
SPK Stump Killer (Herbicide)	Triclopyr Triethylamine (brush or knapsack sprayer)	Used to tackle woody species such as dogwood and wild privet regeneration on our chalk grasslands	Portchester Common, Warsash Common, Anson Grove, Coldeast Conservation Area	Less than 2 litres (1,950ml)

28. Headland Polo, a selective herbicide recommended by the National Trust has been used to control ragwort and thistles on Countryside grazing land in past years but has not been necessary to use since before 2022.

29. Some of the pesticides used on the Countryside locations are linked to High Level Stewardship agreements with Natural England recommended to control unwanted vegetation to protect the sensitive species found on these sites.

30. In addition to the pesticides used in the last full year there are other chemical controls used as required. This information will be used to form the baseline to set the current use of pesticide established by chemical control over the past five years and as set out below.

Pesticide Baseline

Product	Active Substance (how applied)	Used For	Where used	Average Quantity Used Per Annum
Roundup Proactive (Herbicide)	Glyphosate (Knapsack sprayer & stem injection for knotweed)	Used for invasive species control and in preparations to eradicate pernicious	Parks and open spaces	9.57 Litres

		weeds for meadow creation		
Nomix Dual (Herbicide)	Glyphosate and Sulfosulfuron (Controlled droplet technology)	Control of vegetation around obstacles in grass and weeds on hard surface areas.	Highway verges, parks and open spaces, Housing land	75 Litres
Nomix Hilite (Herbicide)	Glyphosate (Controlled droplet technology)	Control of vegetation in borders and cemetery headstrips	Cemeteries	11.35 Litres
Dedicate (Fungicide)	Tebuconazole and trifloxystrobin. (Knapsack Sprayer or walkover sprayer)	Control of fungal infections in fine turf including Fusarium Patch, Red Thread, Dollar Spot and Leaf Spot	Park Bowling Greens and Cricket Squares	0.50 Litres
Instrata Elite Fungicide	Difenoconazole And Fludioxonil (Knapsack Sprayer or walkover sprayer)	Control of fungal infections in fine turf including Fusarium Patch, Red Thread, Dollar Spot and Leaf Spot	Park Bowling Greens and Cricket Squares	1.1 Litre
Greenor Selective	Fluroxypyr, clopyralid and florasulam. (Knapsack Sprayer, walkover sprayer or tractor mounted boom sprayer)	Control of weeds in sports turf.	Parks football bowling greens and cricket pitches	3 Litres
SPK Stump Killer (Herbicide)	Triclopyr Triethylamine	Used to tackle woody species such as dogwood and	Portchester Common, Warsash Common,	3.1 Litres

	(brush or knapsack sprayer)	wild privet regeneration on our chalk grasslands. Stump treatment in parks, open spaces and housing sites.	Anson Grove, Coldeast Conservation Area and occasionally in parks open spaces and housing sites	
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Streetscene Controls and Best Practice

31. All operatives applying pesticides have undergone accredited training and hold a certificate of competence in the safe use of pesticide. Copies of these certificates are held on a training file.
32. Operatives are clearly identified when undertaking herbicide application by wearing high visibility vests with the wording *'Herbicide application in progress'* on the back to inform residents they are in the process of spraying herbicide.
33. Most chemical applications for parks, cemeteries, open spaces, housing amenity land and roadside grass verge chemical treatments are applied using controlled droplet technology. It is a sealed and ready-to-use format and, as such, there is virtually no risk of spillages, while the delivery system allows for extremely accurate application and virtually eliminates spray and run-off.



34. Where possible the targeted application of chemical is to be used rather than a blanket application. Blanket application is only to be used if necessary.
35. Detailed and accurate spraying records are retained on file for a minimum of 3 years.
36. A Control of Substances Hazardous to Health (COSHH) assessment is completed for each chemical in use and reviewed at least every 2 years or when a change occurs.
37. All chemicals are stored in a purpose built locked chemical safe and accurate stock control records are kept.
38. Disposal of used containers, PPE and old or withdrawn chemical is managed via a specialist chemical disposal contractor and is sent on for incineration.

The Phasing Out and Using of Alternatives to Pesticides

39. Non-chemical weed and pest control alternatives are currently limited. However, with an increasing trend towards reduced pesticide use on public land and growing public concern, it is likely that the number of sustainable alternatives will increase in the future. It is also likely that current alternatives will be developed further to be more sustainable to use.
40. The most common alternative controls are shown in the below table along with their advantages and disadvantages:

Method	Use	Advantages	Disadvantages
No control	Everywhere or targeted areas.	No initial and early period cost. Improves wildlife habitat	Over time surfaces will deteriorate, hazards would develop that require higher costs to resolve. Public perception that areas are untidy, unmanaged, and unsafe.
Hot Foam	Weeds on hard surfaces, play areas. Obstacles in grass where accessible	Can be used near water	High cost of equipment and ongoing cost of plant oil extract and diesel. Pollution from fossil fuel and van use. Access restriction due to vehicle and hose requirements.
Hot Water/Steam	Weeds on hard surfaces, play areas.	Can be used near water. Lower cost of	ongoing cost of diesel fuel. Pollution from fossil fuel and van use. Needs

	Obstacles in grass where accessible	equipment than foam	more treatments than foam to be effective. Access restriction due to vehicle and hose requirements.
Flame	Weeds on hard surfaces	Lower cost of equipment. Accessible to most areas	Health & Safety risks. Not fully effective and increased carbon emissions.
Steel brushing	Weeds on hard surfaces	Quicker than hand weeding	Not always effective as deep rooted plants break off and regrow. Need to increase sweeper rounds and therefore costs to achieve results as brush requirements are different than those used for clearing kerb litter and debris. Increased carbon emissions with extra visits.
Manual - hand weeding	Beds borders and hard surfaces	Good control in beds and borders if done well. Low set up costs	Not so good on hard surfaces as most weeds will break off leaving the root system intact. Need to repeat visits frequently for good control and slow to complete so an expensive option
Mulching - Bark or Membrane	Weed control in beds, borders and around trees	Helps to retain moisture in the soil and improves site appearance.	Costly and breaks down over time so needs replacing regularly. Weeds still germinate so control can be patchy.
Mowing/Strimming	Around obstacles in grass	Tidy finish if done well and often.	Can damage trees. Need frequent visits to manage areas well so can be expensive. Carbon emissions rise with number of visits so depends on amount of control required.
Biological Control	Control of pest and disease in fine turf	Can help to break certain pests/disease resistance from using standard	Some products can be expensive and not always fully effective. Not many options available that are fully tested for efficacy and approved.

		chemical control	Usually need more applications than chemical control so staff cost increases
Acetic Acid	Weeds on hard surfaces and around obstacles in grass.	No formal certification required for control.	Not shown to have effective control on deep rooted and woody plants. Strong smell with complaints from operatives that the fumes give them headaches. Can make pets and wild animals have upset stomachs

41. As can be seen from the above table, although there are some advantages with alternative methods, they usually have disadvantages including increased cost, access restrictions, increased carbon emissions, are less effective or have a combination of these shortcomings.

Current Action Taken to Reduce Pesticide Use in Fareham

42. Streetscene already practice an Integrated Pest Management (IPM) system of control wherever possible and use several of the alternative methods seen in the above table in combination with pesticide use to manage the Council's public spaces sustainably.

43. Some examples of Streetscene's existing integrated control measures for maintenance are given below:

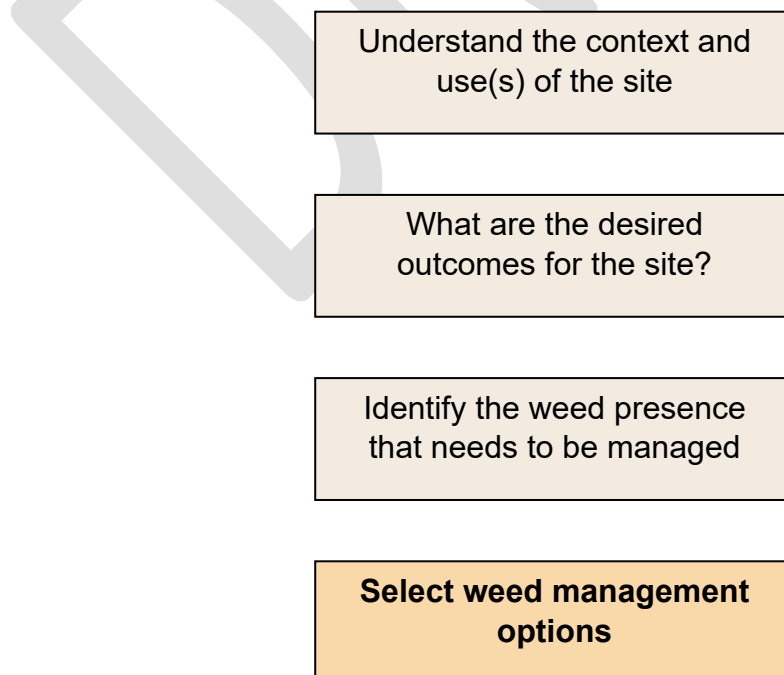
- Street, open space and park obstacles – if complete control is desired then you would need to apply chemicals at least three times a year to maintain a weed/grass free appearance. Streetscene spray around obstacles in grass just once per annum and follow this up with a couple of strimming visits later in the year to keep control of the vegetation rather than a weed free appearance.
- Regular aeration and autumn/early winter brushing of dew and good maintenance of the grass sward helps to reduce fungal infections on fine turf areas that can be expensive to control, particularly if they get a hold. This in turn reduces the need for regular fungicide treatments.
- Mulching of young trees across the borough and in the borders of our main ornamental gardens helps to reduce weed infestations. Hand weeding is also used as the main control of weeds in the ornamental garden borders.
- Streetscene also operate a hot foam machine that is used to control weeds and moss on children's play areas, in locations that are accessible for this equipment, to treat weed growth and moss. Fence lines and obstacles are

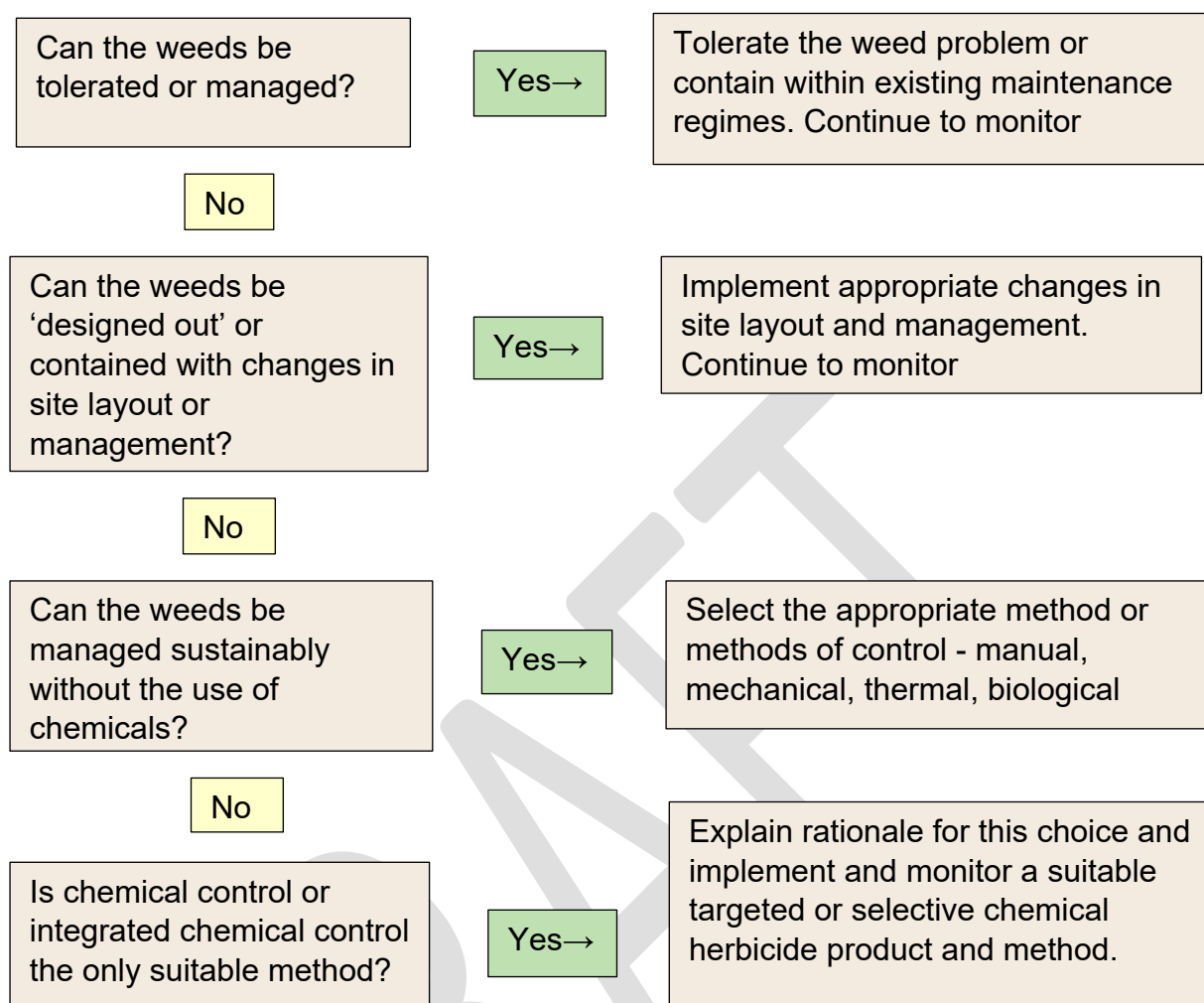
strimmed every 4-6 weeks to almost eliminate chemicals in play areas unless it is necessary.

Action Plan

44. Given all the considerations set out in the document it is recommended that the Council should continue to promote an integrated pesticide method of control at this time. However, Officers will be tasked with keeping up to date with new technologies, monitor other authority's actions and investigate alternative methods as they come forward or evolve with a view to further reducing traditional chemicals. Wherever possible as and when sustainable alternative solutions become available and if possible, eliminate pesticide use when sustainable alternatives are available to do so.
45. To facilitate this action Streetscene's annual chemical use will be monitored to ensure the Council's use of pesticides does not increase and over time, where possible, its use decreases. However, the actual total volume of chemical used in a year may increase as the Council increases its land ownership and responsibilities. This may be acceptable if the use of chemicals is proportionate to the land gain and therefore as a minimum is in line with the existing usage set out in the report.
46. Alongside this Policy a Streetscene Integrated Weed Management Plan (IWMP), will be developed using the below decision tree:

Integrated Weed Management Decision Tree





- Having established the need for weed control, the plan will review all the various approaches and methods available, either as single methods or combinations. These include cultural, mechanical and plant protection products both synthetic and biological. These approaches will then be evaluated in terms of cost, effectiveness, safety, health, environmental impact and, ideally, as information becomes available, subject to some form of life cycle analysis to measure carbon impact.
- In creating the plan, it is also important to seek co-ordination of activities across all involved. For example, in urban areas when controlling weeds on streets and pavements, ensuring those involved in sweeping and keeping areas clean, where it is practicable, needs to link with those applying plant protection products and other methods.

47. Following this IWMP review, an approach will be determined and adopted. If it involves the use of pesticide products, checks will be made to ensure such product is safely stored, meeting legal requirements, and that fully tested and inspected equipment is used by appropriately certificated and trained operatives.

48. The plan will also include a method of review, following implementation, and will be updated regularly to take account of developments and innovations. Such review will consider issues such as re-designing areas to minimise weed growth.

Key Policy Statements

Policy Statement 1 -The Council will continuously review and trial where appropriate new methods of non-pesticide control as they become available, with a view to adopting these as soon as possible, where they offer a viable, economic, and sustainable alternative to pesticide use.

Policy Statement 2 - Where there is no sustainable alternative to using pesticides, the Council will ensure full compliance with a legal requirement, maintain detailed and accurate records of pesticide application usage and storage, and ensure staff and appointed contractors are fully trained and certificated in the safe use of pesticides.

Policy Statement 3 – Ensure effective communication with the public on weed spraying activity. Continue to ensure all operatives are clearly identified when undertaking herbicide application by wearing high visibility vests with the wording `Herbicide application in progress` on the back to inform residents when they are in the process of spraying herbicide. To use the Council's website to inform residents of the current area being treated and to list the areas recently completed.

Policy Statement 4 -The Council will ensure that any future contracts that include the application of pesticides are consistent with the Council's Policy.

Policy Statement 5 - The Council will explore the potential to set up site specific `Friends of The Park` groups to help improve site maintenance. This has the potential to increase the resource available to maintain a site, raise maintenance standards, provide community interaction and ownership of a local park, provide physical and mental benefits for participants that in turn could reduce or even eliminate pesticide use on that site and help create a series of pesticide free parks and open spaces.