

Pesticides Policy

December 2022

Foreword

Protecting, restoring, and increasing biodiversity is a fundamental priority to safeguard the natural systems on which all life on earth is part of and depends.

With changes to how we produce our food, increasing movement of people and resources, alongside the impacts of climate change and other pressures, there are rising and new threats for nature which require our collective action and response to the Climate and Nature Emergency.

This policy sets out the commitments and steps the council is taking to reduce use of pesticides on council owned and managed land. This is important for the benefit of the environment and our communities to achieve our Green Infrastructure Strategy vision for 'greener places where people and nature thrive'

To deliver this policy to reduce pesticide use on the land we are responsible for, the council uses an assessment flow chart and action plan for our operations, staff, and contractors.

We all have a part to play to protect and restore nature and improve the health and wellbeing of the environment and I welcome the approach and measures set out in this policy for the council to take action to reduce use of pesticides. I also hope that this policy will help to raise awareness and inspire action in our communities.

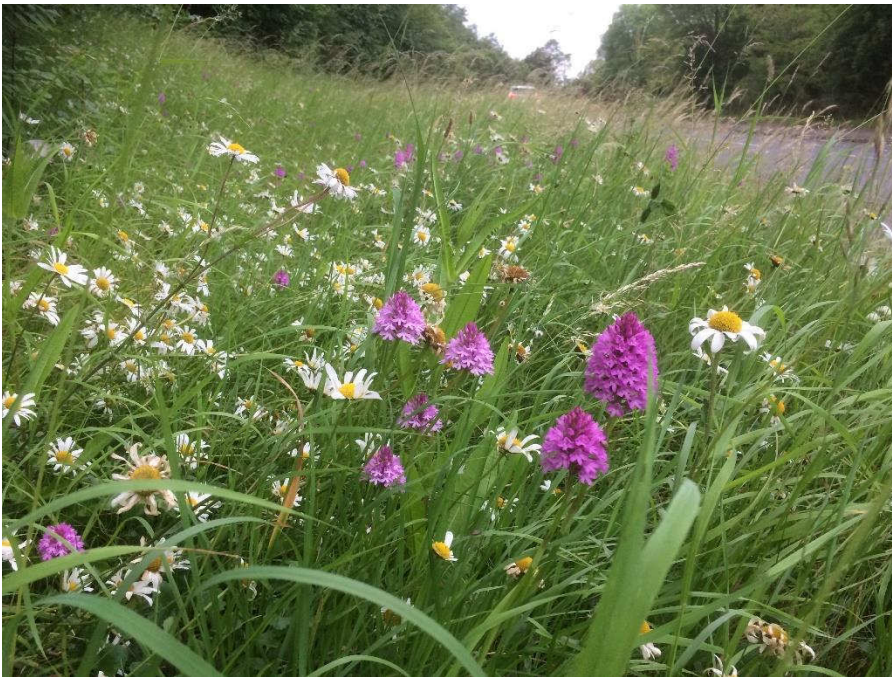


Image: roadside nature reserve in Tytherington South Gloucestershire

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Part one – Setting the scene

1.1 Introduction

South Gloucestershire Council declared a Climate Emergency in July 2019, recognising that the global climate is in a state of breakdown. We need to urgently prepare for the local impacts of a changing climate, reduce our carbon emissions and protect and restore nature.

We also know that climate change along with other factors is having a significant impact on the health of nature and ecosystems, and that this is a critical part of the wider environmental crisis. For this reason, the council has taken an approach that tackles the nature crisis together with the climate emergency and recognises that we face a [Climate and Nature Emergency](#).

Changing the way we manage our assets and work with our partners and communities to reduce pesticide use will play a key role to help us to tackle this emergency together.

Pesticides are a group of chemicals which are used to kill unwanted plants and animals including:

- plants (herbicides) aka weedkiller
- insects (insecticides)
- fungi (fungicides)
- rodents (rodenticides)
- Molluscs – slugs and snails (molluscicides)

Herbicides are used to kill ‘unwanted’ plants and trees, which may otherwise damage surfaces and structures or be growing in an inappropriate location. This includes on pavements to stop breaking up of tarmac by roots and vegetation.

Insecticides are used to kill unwanted insects. Some insecticides are used as pre-treatments for seeds or bulbs. Some insecticides persist only for the lifetime of the plant and others build up in the environment over time.

Fungicides are generally used to control parasitic fungi that either cause economic damage to crop or ornamental plants or endanger the health of domestic animals or humans. Most agricultural and horticultural fungicides are applied as sprays or dusts.

Molluscicides are pesticides which kill mollusks, an animal phylum of tens of thousands of invertebrate creatures. Mollusks include octopi and squid, as well as snails and slugs, which are usually targeted by molluscicides.

Control of rodents including use of **rodenticides** is determined by the [HSE - Rodenticides - Biocides](#) and follows the recommendations of the [Campaign for Responsible Rodenticide Use \(CRRU\)](#) as set out in the South Gloucestershire Council Pest Control Environmental Risk Assessments undertaken prior to the application of rodenticides. Requirements regarding use of rodenticides are regularly updated and products withdrawn, or labels changed, so the council refers to the HSE policy rather than holding a corporate policy on specific rodenticide use. Rodenticide use is out of scope of this Pesticide Policy which

focuses on Herbicide, Insecticide and Fungicide use by the council for land the council owns or manages.

Environmental and health concerns have meant that many countries, towns and cities around the world are phasing out or reducing their use of pesticides, especially glyphosate-based weedkillers.

Reducing pesticide use and finding suitable alternatives will protect insects, plants, soil, water, human food chains, human health and contribute to the delivery of the South Gloucestershire Green Infrastructure Strategy and the Climate and Ecological Emergency action plan.

1.2 Purpose

This policy refers principally to the use of herbicide (including glyphosate) on council owned or managed land.

An assessment flow chart regarding when, why and how the council will use glyphosate-based weedkiller in our operations and by our contractors is set out in this policy. This includes objectives for the overall reduction of pesticides in supply chains and steps the council is taking to reduce pesticide use on the land we own or manage and how this will be measured. This policy makes a case for trialling alternatives to weedkiller and a hierarchy and decision flow chart regarding:

- avoid when not needed (including changes to “less tidy” management and manual measures where viable)
- where chemical treatment is needed, it should be as infrequent as practically possible using substances appropriate to the locality avoiding the most toxic options except where this is deemed essential for the purpose

Our commitment is to identify lower toxicity alternatives where it is deemed necessary to apply chemical control, and to undertake trials and learn from others regarding best practice aligned with legal duties and requirements.

1.3 Legislation and duties

Key EU law: Directive on the Sustainable Use of Pesticides (SUD) 2009/128/EC (since Brexit the EU directives have been transposed into UK law).

Key existing UK laws and guidelines:

- Plant Protection Products (Sustainable Use) Regulations 2012
- National Action Plan for Pesticides (2012)
- [Health and Safety Executive \(HSE\) - pesticides](#)
- Code of Practice for Using Plant Protection Products
- Guidance for all uses of pesticides

- Natural Environment and Rural Communities Act 2006 (NERC Act) section 40 “all public bodies must have regard for the purpose of conserving biodiversity in the discharge of their normal functions”.
- Control of Substances Hazardous to Health (COSHH) 2020

UK regulating body: Department for Environment, Food and Rural Affairs (DEFRA) and Health and Safety Executive (HSE). Pesticide regulation covers issues such as: what training is required for users; hierarchy of assessment; label requirements; how application equipment should be maintained and inspected; measures to protect water and aquatic life from contamination; and how pesticides should be stored and handled as required by COSHH.

UK government DEFRA 25-year Environment Plan includes priorities for:

- Using and managing land sustainably
- Soil Health
- Tackling biodiversity loss
- Helping people improve their health and well-being by using green spaces¹
- Encouraging children to be close to nature, in and out of school

DEFRA advice for local authorities to help restore nature is simple:

- 1 grow more flowers, shrubs, and trees
- 2 let your land grow wild
- 3 cut grass less often
- 4 don't disturb insect nests and hibernation spots
- 5 **think carefully about whether to use pesticide (appendix 1)**

1.4 Responsibilities

“Protecting and enhancing the environment for future generations is a cross cutting value within the South Gloucestershire Community Strategy and is one of the core values that underpins all our work.” South Gloucestershire GI Strategy 2021

The South Gloucestershire biodiversity action plan (BAP) recognises the importance of insects and pollinators and their role within food chains. Glow worms, slow worms and hedgehogs are all local BAP priority species reliant on insects for their food and vulnerable to pesticides. Since 2020 hedgehogs have been put on the UK Red List for species at risk of extinction.

The council has a responsibility to keep people safe. Public concern around pesticides is highest amongst the vulnerable – children, pregnant women, the elderly, the sick.

The council is also responsible for controlling invasive plant species, and maintaining the buildings and other infrastructure we are responsible.

1.5 Current practice

Council staff and contractors that use pesticides follow UK and EU guidelines and receive full training and guidance. Reductions in pesticide use have already been achieved by

South Gloucestershire council. However further reductions where appropriate align with wider work around pollinators, grasslands and wildflowers and habitat management.

Herbicide is required for management of certain weeds and locations where we have statutory responsibilities.

Insecticides and fungicides are not used directly by the council grounds team, however pre-treated seeds which may include Insecticides and fungicides are only used to treat management of cricket pitches by specialist contractors. Where insects or fungi are identified which present risks as set out in the National Action Plan for Pesticides (2012) this is followed up with specialist contractors applying Control of Substances Hazardous to Health (COSHH) requirements and best practice aligned with the council's Environmental Health risk assessments.

Herbicide pesticides are currently used under controlled conditions to:

- Control invasive species eg Japanese knotweed and giant hogweed
- Spot treatment on hard surfaces such as footways and pedestrian areas
- To keep built and transport infrastructure clear of vegetation (i.e roads)
- Pre-treatment of new path routes to prevent damage to new surfaces
- Maintain Sports pitches

South Gloucestershire council and local volunteer groups work in partnership to manage sites for wildlife, insects and pollinators. The council is a member of the West of England Pollinator forum, formerly the Greater Bristol Pollinator Forum. South Gloucestershire council has won Bees Needs awards for its pollinator work and has worked extensively with Buglife and Butterfly Conservation on practical work, education, best practice and policy.

A programme to retrofit council sites for nature sources plants from local pesticide-free suppliers. Each week the council school meals have organic and UK (red tractor) meat options; both of which mean high standards and lower pesticide inputs in the supply chain. In January 2018 all SGC town and parish councils with grounds maintenance contracts with the council were informed of the significant reduction in herbicides and invited to opt back in. No Town and Parish Councils chose to opt back in.

Part 2 – Scope

Pesticide use regarding Herbicide use on land managed or owned by South Gloucestershire Council is the main focus of this policy. Land owned or managed by third parties is not included in this policy.

For information regarding Pesticide use see [HSE pesticides](#) as statutory requirements are regularly updated and changed.

Pest Control – the pest control service provided by the council offers advice and practical help with pest control. More information is available at [http://www.southglos.gov.uk/Pest control](http://www.southglos.gov.uk/Pest-control) | [BETA - South Gloucestershire Council \(southglos.gov.uk\)](#)

Part 3 – Vision and Objectives

3.1 Vision

To reduce the amount of pesticide used on council owned and managed land, and reduce pesticides within council supply chains, where appropriate and aligned with legislation.

3.2 Objectives

Use of Herbicide

1. Reduction of use on vegetated areas

South Gloucestershire Council is committed to reduce usage to an absolute minimum, however there will be occasions through following the assessment flow chart when Pesticides will continue to be used where alternative methods are inappropriate eg control of invasive species.

2. Trials of alternatives on bound surfaces including highways

South Gloucestershire Council will continue to investigate alternative methods and procedures for dealing with unwanted vegetation on bound surfaces including highways; and seek support and funding to continue trials.

3. Communication

Includes engagement of staff and stakeholders, and informing the public.

4. Procurement

Update and apply the council’s Sustainable Procurement Policy regarding pesticides in procurement and contract management and this Pesticide Policy.

Monitoring and reporting

Part Four – Practical advice note

4.1 Assessment of risk

Pesticides are used by the council for specific purposes as set out in this policy following on site risk assessment, hierarchy controls assessment, and applied in line with latest HSE and COSHH requirements.

By applying this policy the council aims to reduce and control pesticide use to the absolute minimum to reduce risks of potential harm to the natural environment and to public health including staff, contractors and the public. Reducing pesticide use will help to protect the health of pollinating insects, soil and water and is an important area of action in the

council's response to the Climate and Nature Emergency and any future changes to chemical licensing.

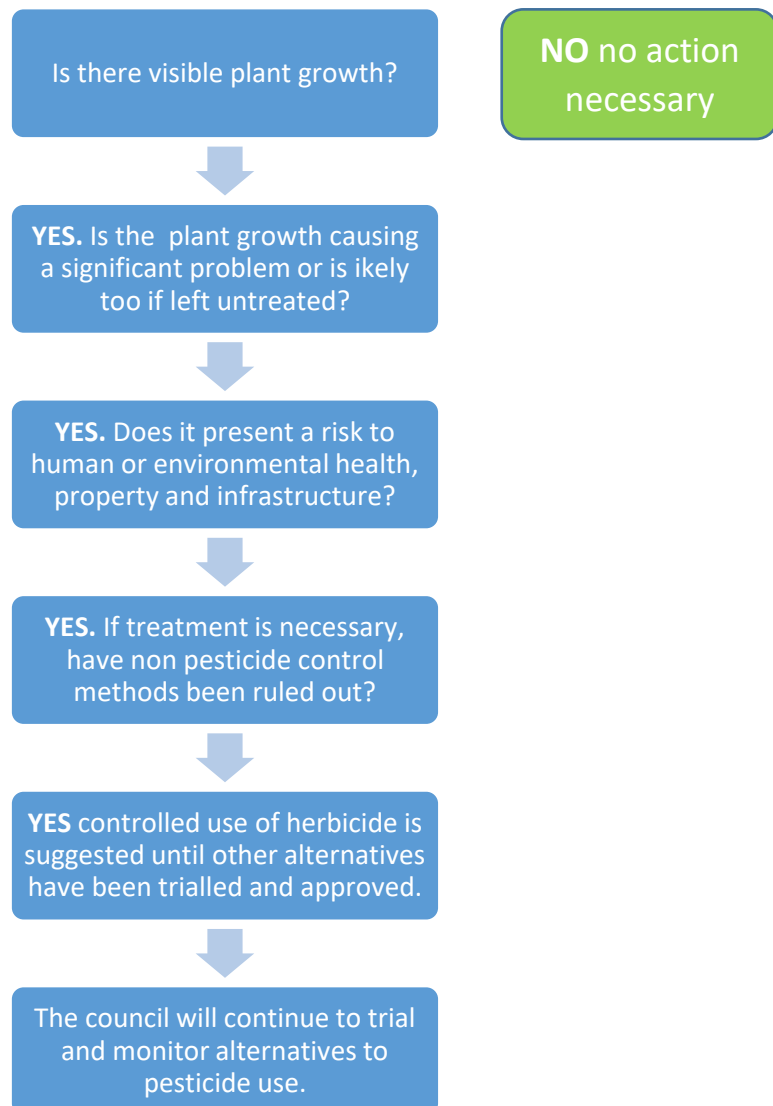
Delivering this policy will require work to raise awareness, build understanding and create buy-in for staff, contractors, and the public.

4.2 Flow chart

When to take action/ the decision process regarding glyphosate 'weedkiller'

1. Is there visible plant growth?
2. Is the plant growth causing a significant problem or is it likely to if left untreated?
3. Does it present a risk to human or environmental health, property, or infrastructure?
4. If treatment is necessary, have non pesticide control methods been ruled out?
5. If not, then controlled use of herbicide is suggested until other alternatives have been trialled and approved.
6. The council will continue to trial and monitor alternatives to pesticide use.

South Gloucestershire Council Herbicide Flow Chart Summary



All pesticide use is recorded as required by COSHH (Control of Substances Hazardous to Health) and this information will be used for monitoring use and progress.

4.3 Policy actions

The council has prepared an operational action plan to implement this policy. The action plan for council staff details the proactive approach required to enable this policy to be enacted. The council will embed these actions in its work to achieve the vision to reduce glyphosate-based weedkiller on council land, trial alternatives and where possible reduce all pesticides within supply chains.

4.4 Monitoring and reporting

Annual reporting on action plan progress will be included in the annual Green Infrastructure and Nature Recovery Action Plan to 2030 progress report to Cabinet on the reduction of glyphosate-based weedkiller used on open spaces and highways the council is responsible for.

An update on any trials of alternatives to glyphosate-based pesticides on the highway and bound surfaces will be prepared.

An update will be provided annually about pesticides in the council supply chains for food and plants.

Glossary

Bound surface: eg tarmac. Includes safety play surfaces, gravel, cobbles, car parks, cycle paths and pavements.

Carcinogen: can cause cancer including non-Hodgkins lymphoma

Closed churchyard: a churchyard which is closed to burials and has been passed from the church to the council for management.

Glyphosate: [HSE use of herbicide \(weedkiller\)](#) 'Glyphosate is the active substance in many herbicides (weed killers) and is widely used around the world. It is a non-selective, systemic herbicide /weedkiller and was first used in the UK in 1976.

Glyphosate is effective in controlling most weed species including perennials and grasses in many situations including amenity, forestry, aquatic and industrial situations. It is used by lots of people from farmers to foresters to gardeners to biologists trying to control invasive exotic plants.

Since it is approved for use in many countries, it has been subject to extensive testing and regulatory assessment in the EU, USA and elsewhere, and by the World Health Organisation.'

Herbicide: a chemical used to kill a plant

Highway: road but can include footway or verges for legal purposes

Insecticide: a chemical used to kill an insect

Leased land: council owned land which is managed by a third party such as a parish council, sports club or farmer

Open Space: not classified as highway eg grass area, park, amenity area

Pollinator: an animal, usually an insect, which pollinates a plant by moving pollen between flowers which helps with fruit or seed production.

Neonicotinoid: a specific type of insecticide

Pesticide: a substance used to kill or control a pest

Procurement: buying

Weed: a plant growing in an unwanted location

References

- [Health and Safety Executive \(HSE\) - pesticides](#)
- DEFRA [Bees' Needs: Food and a home - GOV.UK \(www.gov.uk\)](#)
- Pesticide Action Network www.pan-uk.org
- West of England Pollinator Strategy www.wenp.org.uk/pollinators
- [Buglife | Help Buglife save the planet](#)
- [Plantlife international](#)
- [South Gloucestershire Climate and Nature Emergency](#)
- [South Gloucestershire Green Infrastructure and Nature Recovery Action](#)
- [http://www.southglos.gov.uk/Pest control | BETA - South Gloucestershire Council \(southglos.gov.uk\)](http://www.southglos.gov.uk/Pest%20control%20|%20BETA%20-%20South%20Gloucestershire%20Council%20(southglos.gov.uk))
- South Gloucestershire Plant Biosecurity Policy
- [Ash dieback disease | South Gloucestershire Council \(southglos.gov.uk\)](#)
- [HSE - Rodenticides - Biocides](#)
- [Campaign for Responsible Rodenticide Use \(CRRU\)](#)

Appendix 1. Greater Bristol Pollinator forum advice note

GET BRISTOL BUZZING

LINKING ACTIONS FOR POLLINATORS ACROSS BRISTOL

INSECT POLLINATORS ARE IN TROUBLE
Our wild plants and food crops are pollinated by many types of bees, butterflies and other insects. Pollinators need more food, shelter and places to nest.

OUR PARKS, GARDENS AND WINDOW BOXES CAN ALL HELP POLLINATING INSECTS

www.getbristolbuzzing.org

5 SIMPLE ACTIONS TO HELP POLLINATING INSECTS

- 1 PLANT FOR POLLINATORS**
Grow more nectar- and pollen-rich flowers, shrubs and trees.
- 2 LEAVE PATCHES OF LAND TO GROW WILD**
Wildflowers are important for insects and undisturbed areas make good nesting sites.
- 3 PUT AWAY THE PESTICIDES**
They can harm bees and other beneficial invertebrates.
- 4 LEAVE YOUR MOWER IN THE SHED**
Cut grass less often to allow plants to flower. If possible remove the cuttings after you mow longer grass.
- 5 MAKE A BEE HOUSE**
Drill holes in a log or bundle up lengths of bamboo to provide nesting sites for solitary bees.

Supported by:

BRISTOL 2015 GREEN CITIES

www.getbristolbuzzing.org