BCP CHEMICALS USED 2023

The Need for a Review of Hazardous Chemical Use by BCP Council

A Report by Stephen Harper, Environmental Representative for UCU at Bournemouth University.

In July 2023, Cllr. Andy Hadley (Portfolio Holder for Climate Response, Environment and Energy) supplied a list of potentially hazardous chemicals used at BCP Council. This particularly highlighted a concerning level of usage of Glyphosate and Asulox.

The <u>BCP Draft Local Plan</u> mentions "biodiversity" 62 times in the document¹. The Council has many environmental responsibilities and legal duties which require it to avoid or manage the use of hazardous chemicals. It is difficult to understand how the Council will be able to achieve the objectives and policies contained in the Plan while using chemicals that are harmful to the environment, ecology, and human health.

This document details the toxicity of these chemicals and the harm already caused to the environment and to human health. It also considers the regulations which currently apply to their use and the best practices followed by other councils and countries. This report has also been endorsed by East Dorset Friends of the Earth.

There are three important questions that need to be answered by the BCP Council:

- 1. What were the quantities of chemicals used by BCP Council in 2023?
- 2. Why is the BCP council not restricting the use of these chemicals in the listed public sensitive areas?
- 3. How is the BCP council informing the public of the risks to these chemicals?

Note 1

From Bournemouth, Christchurch and Poole (BCP) Council draft Local Plan

https://democracy.bcpcouncil.gov.uk/documents/s46023/Appendix%201%20for%20Consultation%20on%20the%20Draft%20of%20the%20Bournemouth%20Christchurch%20and%20Poole%20Local%20Plan%20and%20D.pdf

"Successful places must adapt to a changing world, and a focus on sustainable growth provides an opportunity to become more resilient and environmentally focused. As a responsible place, the BCP area must limit its impact on the environment, biodiversity and climate change while adapting to the consequences of the environmental change."

"We will: ensure a net gain in biodiversity"

"The UK is one of the most nature depleted countries in the world and we have a legal duty to have regard to conserving biodiversity as part of our policy and decision making. The policies in this chapter set out how we will preserve and enhance the natural environment".

"BCP Council declared a Climate and Ecological Emergency in 2019, and sustainability forms a golden thread throughout this plan. New development must be responsible, mitigate its environmental impact and consider green infrastructure.....I am passionate about the role BCP Council must play in helping our area improve biodiversity"

"As a responsible place, the BCP area must limit its impact on the environment, biodiversity"

"Strategic Policy S1:

c. provide urban greening and biodiversity net gain";

"Strategic Policy NE1: Natural Environment

The UK is one of the most nature depleted countries in the world and we have a legal duty to have regard to conserving biodiversity as part of our policy and decision making.

f. ensuring all development achieves a measurable biodiversity net gain."

"The council has adopted a Green Infrastructure Strategy which sets out the council's ambitions for investing in green infrastructure across the conurbation, to reverse biodiversity loss"

Table 1. List of Chemicals used in BCP 2023

	Product	Туре	where used?	Active ingredients	En	Ec	Hh
1	Gallup (4 types of this product on the market : Gallup Biograde Weedkiller RTU 17750, Gallup Hi- Aktiv Amenity 17681, Gallup Home & Garden 17672, Gallup XL 17663)	Herbicide	O/S	Glyphosate https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/373.htm			
2	Nomix G	herbicide	O/S	Glyphosate			
3	Nomix Dual	herbicide	O/S	Glyphosate			
4	(N) Nine-(P) five-(K) five	fertiliser	Sports Pitches	No data found			
5	Icade https://www.rigbytaylor.com/product/chemicals/herbicide- chemicals/tough-weed-herbicide-herbicide-chemicals/icade- herbicide-1l/	Herbicide	O/S	12 g/l aminopyralid https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/29.htm 120 g/l triclopyr https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/659.htm			

6	(N) six (P) five (K) eighteen	fertiliser	QP Golf	No data found		
7	(N) four (P) three (K) four	fertiliser	QP Golf	No data found		
8	(N) five (P) two (K) ten	fertiliser	QP Golf	No data found		
9	Medallion T	Fungicide	QP Golf	1,2-benzisothiazol-3-one https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1361.htm https://www.echa.europa.eu/documents/10162/2842450/clh bd 1%2C2-benzisothiazolin-3-one 21453 en.pdf/9352be87-865a-75aa-cba4-51618042fdab https://ec.europa.eu/health/scientific committees/consumer safety/docs/sccs o 099.pdf https://www.syngentaturf.co.uk/sites/g/files/kgtney1086/files/media/document/2021/07/05/sd s uk medallion tl v8.0.pdf		
10	Fusion https://www.rigbytaylor.com/product/fungicide/fungicide-for-anthracnose/fusion-systemic-turf-fungicide-1l/	Fungicide	QP Golf	trifloxystrobin https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/664.htm tebuconazole https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/610.htm		
11	Barrier H https://www.green-tech.co.uk/weed-killer-and-pesticides/weed-killer-and-herbicides/barrier-h	Herbicide	SSSI O/S	https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/203.htm https://ipm-coalition.org/taxonomy/term/6263 22.9% Citronella Oil https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1463.htm		

12	Katoun Gold https://www.rigbytaylor.com/product/chemicals/herbicide- chemicals/total-herbicide-herbicide-chemicals/katoun-gold-total- herbicide-5l/	Herbicide	SSSI O/S	500 g/L fatty acids: pelargonic acid https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1327.htm		
13	Roundup Pro	herbicide	SSSI O/S	Glyphosate		
14	Asulox https://www.brackencontrol.co.uk/asulam	Herbicide	SSSI O/S	It is currently marketed, by United Phosphorus Ltd - UPL, as "Asulox" which contains 400 g/L of asulam sodium salt. Asulox will not be permitted for use in 2024. https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1551.htm https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:275:0023:0024:EN:PDF		
15				Fluroxypyr 105g/l		
				https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/347.htm		
	Holster XL			2,4-Dichlorophenoxyacetic acid 285g/l		
	https://agrobaseapp.com/ireland/pesticide/holster-xl	Herbicide	Sports pitches	https://ipm-coalition.org/taxonomy/term/6474 https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/4.htm		
				Dicamba 52.5g/l https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/213.htm		
16	Dicophar	Herbicide	Sports Pitches	70g/L 2,4-D (Dichlorophenoxyacetic acid) https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/4.htm		

				70g/L MCPA, (2-methyl-4-chlorophenoxyacetic acid) https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/427.htm 42g/L MCPP-P,(Mecoprop-P) https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/427.htm 20g/L Dicamba https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/213.htm		
177	Rose Clear (NB there are 3 products on the market with the Rose clear name: RoseClear 3 In 1 Action 19657, Roseclear Ultra14854 and Roseclear Ultra GUN!14801) https://www.sys-uk.com/wp-content/uploads/2016/01/MSDS-RoseClear-FullCure-MED655-English.pdf	Pesticide/Fu ngicide	Poole Park	exo-1,7,7-trimethylbicyclo[2.2.1]hept-2-yl acrylate urethane acrylate oligomer Photoinitiator acetamiprid https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/11.htm triticonazole https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/673.htm		
18	Vitax 1:0:1 https://www.bhgsltd.co.uk/ProductGrp/brands/vitax/vitax-vitafeed- 1-0-1 1 Multipurpose Soluble Feed Vitafeed 111.pdf (gardenworld.co.uk)	Plant nutrition	Poole High street	Potassium nitrate Disodium octaborate Disodium octaborate (herts.ac.uk)		

19				No data found		
	Terralift Rocastem https://www.aitkens.co.uk/products/soil-amendments-biostimulants/terralift-rocastem.aspx	Liquid aerator/Root Stimulant	Sports/ Poole Park	https://www.aitkens.co.uk/media/169317/rocastem ab sds 2019.pdf		
20				Sodium Lauryl Ether Sulphate		
	SB plant invigorator		Poole	https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/2671.htm		
	https://sbproducts.co.uk/safety-data/concentrate-safety-data/	Insecticde	Park			
21				iron-orthophosphate		
				https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1478.htm		
	Sluxx-HP	Slug pellets	General	https://www3.epa.gov/pesticides/chem_search/reg_actions/registration/related_PC-		
	https://www.agrigem.co.uk/media/catalog/product/s/l/sluxx-	orag poners	Contrar	<u>034903_1-Oct-98.pdf</u>		
	hp msds-2019.pdf			https://www.echa.europa.eu/web/guest/substance-information/- /substanceinfo/100.030.123		
22	Eco-plugs			Glyphosate 680 g/kg		
	https://www.progreen.co.uk/ecoplug-max-100-plugs-prevent-tree-stump-regrowth/	Herbicide for tree stumps	Arb ops			
23	tice starip regiowary			267 g/kg boscalid		
25						
	C!	Formatalida	Poole	https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/86.htm		
	Signum	Fungicide	Park	67 g/kg pyraclostrobin		
				https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/564.htm		

24				didecyldimethylammonium chloride		
	MMC-PRO			https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/988.htm		П
	https://www.nomixenviro.co.uk/wp-	Mould cleaner	General	propan-2-ol; isopropyl alcohol; isopropanol		
	content/uploads/2021/11/MMC-Pro-SDS-21.pdf			https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/407.htm		
				Ecotoxicity High alert:Daphnia acute ecotoxicity: High; Bees acute		
				unknown ecotoxicity: High		
				C9-11 PARETH-8		
				https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1316.htm		П
25	Rosate 360 TF	Herbicide		Glyphosate 360.000 g		
26	Roundup proactive 360	Herbicide		Glyphosate 360.000 g/L		

Notes on Table 1

The right-hand corner of the above chart refers to the impacts of these chemicals upon En, (Environmental Fate), EC (Ecotoxicity) and Hh (Human Health). Which is referenced from the in terms of the alert rating they use.

Example colour-coded alerts from PPDB: Pesticide Properties Database.(University of Hertfordshire)

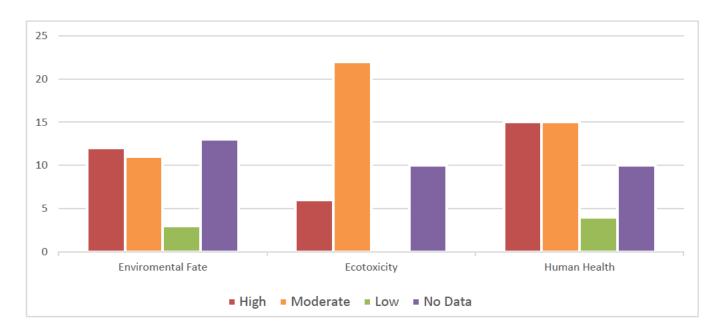
I have put links in comments to each active ingredient of the products used in the chart that I could find .

Table 2. Example alerts taken from the University of Hertfordshire's Pesticides Properties Database

Environmental fate Low alert: Non-persistent	Ecotoxicity Low alert	Human Health Low alert
Environmental fate Moderate alert: Drainflow: Moderately mobile	Ecotoxicity Moderate alert: Birds acute ecotoxicity: Moderate; Birds chronic ecotoxicity: Moderate; Fish chronic ecotoxicity: Moderate; Earthworms acute ecotoxicity: Moderate	Human health Moderate alert: Mammals acute toxicity: Moderate; Mammals chronic toxicity: Moderate; Possible Reproduction/development effect
Environmental fate High alert: GUS: High leachability; Drainflow: Mobile	Ecotoxicity High alert: Earthworms acute ecotoxicity: High	Human health High alert: Reproduction/development effects

https://sitem.herts.ac.uk/aeru/ppdb/en/search.htm

Chart 1 DATA ALERTS



Notes: The above graph shows that the 43 Active ingredients in the chemicals used at BCP, and which ones have Chemical Alerts associated with them. Glyphosate has been counted seven times, as it is in seven different products which BCP Council uses. The moderate risk to ecotoxicity being the greatest. All being used in Public areas.

Analysis

It is a concern to me that there are a number of unknowns, as the chemicals need to have a CLP regulation label. And also a deep alarm to me of the effects of other chemicals that BCP uses has on the health of our biological, chemical and physical stressors affect on BCP's ecosystems. This is particularly true of number 14, **Asulox**, it has no UK approval.

Products which have Glyphosate as the active ingredient are the most commonly used by the council.

This concerns me because of the research on Glyphosate clearly shows that:

- "Glyphosate is a widely used herbicide worldwide. Although its target organisms are plants and microorganisms, it exerts a series of lethal or sublethal effects on beneficial honeybees." Effects of glyphosate exposure on honeybees. (DOI: 10.1016/j.etap.2021.103792)
- "The present study supports the hypothesis that the exposure of bees to GLY and glyphosate-based formulations, in ecologically relevant doses or in recommended concentrations used in agricultural settings, might cause lethal effects (mortality) in these insects." Is glyphosate toxic to bees? A meta-analytical review https://doi.org/10.1016/j.scitotenv.2021.145397

Also various articles cite the harmful effects of glyphosate to bees:

https://www.theguardian.com/environment/2022/jun/02/glyphosate-weedkiller-damages-wild-bumblebee-colonies

https://www.soilassociation.org/news/2018/september/25/glyphosate-harmful-to-bees-new-study-finds/

Repeated applications of glyphosate alter the microbial community of certain soils and increase soil pathogens and plant nutrient uptake. *Isolation and characterization of a glyphosate-degrading rhizosphere strain, Enterobacter cloacae K7 - ScienceDirect.*

It also affects the reproduction of earthworms and causes a dramatic decline in their population. <u>Glyphosate-based herbicides reduce the</u> <u>activity and reproduction of earthworms and lead to increased soil nutrient concentrations - PubMed (nih.gov)</u>.

Glyphosate and its salts were moved to the Red list, according to Fair Trade International. The following materials are moved to Red list of prohibited materials from Orange list of restricted materials: https://files.fairtrade.net/standards/Hazardous Materials List EN.pdf. Page 19

Fair trades data has been accumulated from the following organizations:

Table 3

POP: The Stockholm Convention on Persistent Organic Pollutants https://chm.pops.int/
 PIC: The Rotterdam Convention on the Prior Information Consent Procedure for Certain
 Hazardous Chemicals and Pesticides in International Trade https://pic.int/
 EU: Banned or severely restricted in the European Union according to PAN List of Lists
 PAN 12: Pesticide Action Network's "dirty dozen" list (currently 18 pesticides) https://www.pan-uk.org/resources/#highly hazardous pesticides
 US: Banned or severely restricted pesticide EPA

according to PAN List of Lists

The World Health Organisation has a produced a summary: Recommended Classification of Pesticides by Hazard, and Guidelines to

Classification, 2019. This recommended glyphosate should be included in Classification of Pesticides by Hazard, Class III

The following 42 UK boroughs and townships have issued bans or restrictions on pesticides and herbicides, including glyphosate:

Table 4

1. Balerno (Scotland)	11. Derry City (Northern	22.Highland (Scotland)	32. Petersfield
2. Bath	Ireland)	23. Lambeth	33. Reading
3. Brighton	12. Faversham	24. Lewes	34. Renfrewshire (Scotland)
4. Bristol	13. Folkestone & amp; Hythe	25. London - Greater London	35. Shaftesbury
5. Bury (ban in children's play	14. Frensham	Authority	36. Shetland (Scotland)
areas)	15. Frome	26. Lyme Regis	37. Sunderland
6. Cambridge	16. Glastonbury	27. Manningtree	38. Trafford
7. Chichester	17. Guildford	28. Midlothian (Scotland)	39. Wadebridge
8. Colchester	18. Hackney	29. North Lanarkshire	40. Warminster
9. Cowes (Isle of Wight)	19. Hadleigh	(Scotland)	41. Waverley
10. Croydon	20. Hammersmith & Fulham	30. North Somerset	42. Wirral
	21. Hexham	31. Peterlee	

https://www.wisnerbaum.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-qlyphosate-banned-/

City of Westminster "Consequently, the ban incorporates all products containing glyphosate on all council managed outdoor spaces and housing estates. With the council encouraging all landowners in the borough to follow suit. This follows from the previous phasing out of the use of glyphosate in parks, play areas, streets, and open spaces in 2020" https://www.westminster.gov.uk/news/councils-push-green-spaces-after-banning-toxic-weedkiller-all-council-property

The Royal Borough of Kensington and Chelsea "In order to further support The Royal Borough of Kensington and Chelsea's environmental objectives, idverde has adopted the Foamstream method of weed control on the contract, following a successful trial in the London Borough of Southwark. Foamstream is an environmentally friendly method of weed control, which kills weeds using a mixture of hot water and foam, and which thereby greatly reduces the need for the use of herbicides on the contract." https://www.idverde.co.uk/projects/long-term-partnership-with-a-carbon-neutral-goal

London Borough of Hammersmith and Fulham. "To be the most environmentally positive borough in the country we have to be bold and innovative in what we do. That's why we were the first London borough to halt the standardised spraying of potentially harmful glyphosate weedkillers. We're really excited about pioneering the use of chemical-free weed control that is better for people, pets, and the environment."https://www.bali.org.uk/news/idverde-adopt-chemical-free-weed-control-solution/

On the 19th December 2022, the UK Government at the Conference of the Parties 15, agreed with other Nations to adopt Four Goals and 23 Targets for 2030,in the Landmark UN Biodiversity Agreement:

COP15: TARGET 7

Reduce pollution risks and the negative impact of pollution from all sources, by2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on science, taking into account food security and livelihoods; and also preventing, reducing, and working towards eliminating plastic pollution.

 $\underline{https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022}.$

https://www.gov.uk/government/news/new-deal-to-protect-nature-agreed-at-cop15

Which is why it is essential to know how much of these chemicals BCP Council is using and whether it is meeting these targets to reduce its use of these chemicals.

Status of glyphosate in the EU

Glyphosate is currently approved in the EU until 15 December 2033

The COMMISSION IMPLEMENTING REGULATION (EU) 2023/2660 (28 November 2023) renewed the approval of the active substance glyphosate in accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council and amending Commission Implementing Regulation (EU) No 540/2011 https://eur-lex.europa.eu/eli/reg_impl/2023/2660/oj

However, there are these conditions and restrictions;

- (27)The use of plant protection products containing glyphosate for pre-harvest uses may not always be compliant with Directive 2009/128/EC in conjunction with the provisions of Article 55 of Regulation (EC) No 1107/2009. Therefore, Member States should be required to pay particular attention to pre-harvest uses when carrying out assessments for their authorisation. Specifically, use of plant protection products containing glyphosate for desiccation to control the time point of harvest or to optimise threshing is not considered to comply with the provisions of Article 55 of Regulation (EC) No 1107/2009 and, therefore, should not be authorised.
- (28)As plant protection products containing glyphosate are also used for non-agricultural applications, Member States should, in accordance with Directive 2009/128/EC, ensure that the use of plant protection products containing glyphosate is minimised or prohibited in sensitive areas such as public parks and gardens, sports and recreation grounds, school grounds and children's playgrounds and in the close vicinity of healthcare facilities.
- (30)Glyphosate has been subject to two comprehensive assessments since 2012, both of which have not identified concerns indicating that the approval criteria laid down in Regulation (EC) No 1107/2009 are not fulfilled. As such it cannot be expected that in the near term enough new information would be accumulated to result in a different outcome. At the same time, it is noted that research on glyphosate has intensified in recent years and new insights on the properties of glyphosate relevant for the protection of human health and environment might arise. In order to balance those considerations, it is appropriate to provide for a renewal of the approval of

glyphosate for a period of 10 years. Furthermore, the approval of the active substance may be reviewed at any time pursuant to Article 21 of Regulation (EC) No 1107/2009.

Directive 2009/128/EC, States

- (10) Considering the possible risks from the use of pesticides, the general public should be better informed of the overall impacts of the use of pesticides through awareness-raising campaigns, information passed on through retailers and other appropriate measures.
- Use of pesticides can be particularly dangerous in very sensitive areas, such as Natura 2000 sites protected in accordance with Directives 79/409/EEC and 92/43/EEC. In other places such as public parks and gardens, sports and recreation grounds, school grounds and children's playgrounds, and in the close vicinity of healthcare facilities, the risks from exposure to pesticides are high. In these areas, the use of pesticides should be minimised or prohibited. When pesticides are used, appropriate risk management measures should be established and low-risk pesticides as well as biological control measures should be considered in the first place https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:32009L0128

It is important to note that many countries have gone further regarding the regulations and conditions of the use of glyphosate. These include Austria, Belgium, Czech Republic, Denmark, Estonia, Finland, France Germany, Italy, Luxembourg Netherlands, Slovakia, Slovania and Sweden. The comprehensive details of these policies are available as a pdf file EU COUNTIES OWN RESTRICTIONS ON THE USE OF GLYPHOSATE in my Google drive (link at bottom of report)

Outside of the EU, 28 US Cities that have Restricted or banned glyphosate

https://www.wisnerbaum.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-glyphosate-banned-/

This raises questions about:

Why is the BCP council not restricting the use of these chemicals in the listed sensitive public areas?

How is the BCP council informing the public of the risks to these chemicals?

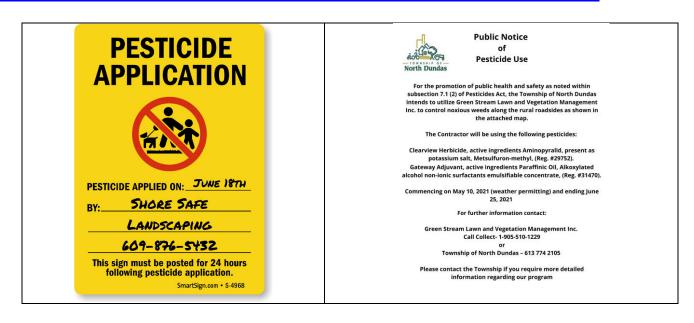
Although Britain has left the EU, many EU laws and Regulations still apply to the UK:

Regulating pesticides in the UK after Brexit.

"All relevant EU law in relation to the regulation of plant protection products in force on 31 December 2020 was retained in GB law". https://www.hse.gov.uk/pesticides/brexit.htm

Examples of Responses by other Authorities

Below are just some examples of how other local authorities are informing the public of the risks to these chemicals. More examples in Google Drive. https://drive.google.com/drive/folders/1rBg6FiGiTB8IsEXuD6swT6gY-y9 1vV7?usp=drive link.





Many other countries have done similar things:

https://www.health.wa.gov.au/Articles/N R/Pesticide-signage-when-spraying-in-a-public-place

Notice for Schools and day care centres New York State :

https://ag.ny.gov/resources/organizations/business-quidance/pesticide-notification-requirements

1999 US report https://www.beyondpesticides.org/assets/media/documents/infoservices/pesticidesandyou/Winter%2098-99/The%20Building%20of%20State%20Indoor%20Pesticide%20Policies.pdf

County of Essex May 21, 2020 https://www.countyofessex.ca/en/news/public-notice-of-pesticide-use.aspx

Public Notice of Pesticide Use, Middlesex County May 2, 2023

https://www.middlesex.ca/sites/default/files/2023-05/2023%20Weed%20Spraying%20Notice 0.pdf

https://www.strathroytoday.ca/2023/05/02/notice-public-pesticide-use/

https://inhabitat.com/why-is-san-francisco-spraying-toxic-pesticides-in-public-parks-and-playgrounds/

Environmental guidance for your business in Northern Ireland & Scotland:

Notify local people before spraying:

Before you spray pesticide, you must also notify:

- •local bee-keeper groups at least 48 hours before application
- •the chief environmental health officer for the area, or in Northern Ireland the district council, 24 to 48 hours before application
- •occupants or owners of property within 25 metres of the area to be treated, 24 to 48 hours before application
- •the person in charge of any **school**, **hospital** or **other institution** within 150 metres of the flight path, 24 to 48 hours before application https://www.netregs.org.uk/environmental-topics/materials-fuels-and-equipment/materials-and-equipment-for-agriculture-animal-care/spraying-pesticides/

Terminology: Pesticides and Herbicides

There may be some confusion over the term pesticides, and in regulations towards herbicides. Glyphosate is classified as a herbicide.

The following is the weblink to the Code of Practice;

:https://www.hse.gov.uk/pesticides/assets/docs/Code of Practice for using Plant Protection Products - Complete20Code.pdf from Sparsholt College Hampshire, who do the training in PA1 and PA6

The spraying of herbicides needs to follow the same regulations, as it is spraying harmful chemicals

"The term 'pesticides' is defined in the Control of Pesticides Regulations 1986 (as amended by the Control of Pesticide (Amendment) Regulations 1997), regulation 3. Briefly, it means any substance, preparation or organism that is prepared for or used to control any pest. A pest is any unwanted plant, harmful creature, or organism that is harmful to plants, wood or other plant products".

These regulations also state that;

When applying pesticides:

- in areas where the public are allowed to go, you must make sure that people are not put at risk;
- to crops or other areas to be treated, you must not let your pesticide drift onto areas or routes where the public have access, whether people are using them at the time or not.

To make sure people are not put at risk you should:

- Find out the public access provision on or near to areas you are treating.
- Stop for a while if there is a risk to health, for instance from the machinery you are using or from spray, if there are people using the land or right of way while you are applying pesticides.
- Not put anyone at risk as you apply the pesticide if a public right of way or other public access crosses or runs alongside a field or other area you are going to treat. Consider using notices to tell people that pesticides are being applied and asking them to keep themselves, children and pets to the path or access area. Remember, you must not put up a notice that might stop people going onto the right of way or into any area they have a right to use. You should contact the highway authority (usually your local authority such as county or unitary authority) and get their advice (you need their permission if you are putting a notice on the right of way). You may want to tell people what the pesticide is and what it does without using technical jargon they may not understand. You can put such notices on the grounds rather than on the public right of way, but everyone should be able to see them from where they are allowed to go.
- Put up suitable warning notices at the main access points to the area when you are applying pesticides in areas where people are allowed to go over a wide area, such as moorland or forests. These access points may be where the public leave the tarred road or car park and should be a considerable distance from the application site. In the notices you may want to suggest an alternative route.
- Take account of any remaining risks, such as to children and pets straying into freshly treated areas. Some pesticide labels tell you to keep unprotected people and livestock out of the treated area for a specific period. Do not use these pesticides if you cannot restrict access to the site until the area is safe.

Also in this same document, the following advice is given concerning bees:

3.8.5 How can bees be protected?

The British Beekeepers' Association (BBKA) will be able to give you details of the beekeepers' spray liaison officer for areas in England (see their website at www.bbka.org.uk). For Welsh areas you should phone the Welsh Beekeepers' Association (WBA) on 01974 298336.

Products that may harm bees will be labelled as 'harmful', 'dangerous', 'extremely dangerous' or 'high risk' to bees. You should tell the beekeepers identified in your environmental risk assessment, or the local beekeepers' spray liaison officer, 48 hours before you plan to use a pesticide at the times of the year when bees are at risk or whenever you intend to use a pesticide that specifically harms bees. This will allow beekeepers to take the necessary precautions. You should also tell beekeepers if you change your plans.

I can confirm from the president of the <u>Dorset Beekeepers Association</u>. No one from the BCP council has contacted them about the use of pesticides or herbicides applications .

The use of any chemicals on the environment is a very serious concern for our country's future.

As reported to the House of Commons Science Innovation and Technology Committee: Insect Decline and UK Food Security, June 2023.

There has been a 60% decline in the insect population in less than 10 years. Mainly due to the use of pesticides and land-use.

https://parliamentlive.tv/event/index/da53cb80-399e-4f8d-94e2-3855fa2b2b99

https://parliamentlive.tv/event/index/a677fe19-0e47-4b39-972f-c1fd78883886

Full reports in google drive with video testimony. (Click bellow link)

https://drive.google.com/drive/folders/1x-Yl3c6PCWqjtqbjn01DQohy5 bVLxzr?usp=sharing

In terms of precise risk mitigation, research indicates that France has been compensating farmers with Parkinson's for the last three years following numerous scientific studies linking the disease to the use of the pesticide.

https://www.euronews.com/2023/11/17/france-to-continue-compensating-farmers-with-parkinsons-disease-linked-to-glyphosate-use

France does not yet want to ban the pesticide, but is convinced that there is a link between Parkinson's disease and the chemical. As a consequence, farmers in France who can prove they are suffering from Parkinson's disease are entitled to compensation from the government.

Financial risk to the council.

Bayer is the company that makes glyphosate. Bayer's shares fall nearly 6% after a court order to pay \$2.25 billion in damages was issued in the Philadelphia, January 29, 2024

https://www.reuters.com/business/healthcare-pharmaceuticals/bayer-shares-drop-45-after-jury-verdict-over-225-bln-damages-2024-01-29/
In 2020, Bayer settled most of the Roundup cases that were pending at the time for up to \$9.6 billion but failed to get court approval for an agreement to prevent future cases. More than 50,000 claims now remain pending

A California jury hit Bayer with \$2 billion award in a Roundup cancer trial May 14, 2019

https://www.reuters.com/article/us-bayer-glyphosate-lawsuit-idUSKCN1SJ29F

As mentioned in a previous email to BCP councillors in July, alternatives to most of these chemicals exist . An example is the Foamstream method used by other councils.

Details of this and all the research and information is available on the following google shared drive.

https://drive.google.com/drive/folders/1Q0zGdPfFPahPKWncX99CLsAFCELsjE3I?usp=sharing

To reiterate, BCP Council needs to be able to answer the following three questions.

- 1. What were the **quantities** of chemicals used by BCP 2023?
- 2. Why is the BCP council not restricting the use of these chemicals in the listed <u>sensitive public areas</u> in accordance with the Directive 2009/128/EC?
- 3. How is the BCP council informing the public of the risks to these chemicals in accordance with the Directive 2009/128/EC?

Regards



Stephen Harper UCU Environmental Rep for Bournemouth University

Other Sources;

https://ipm-coalition.org/facet-database

https://secure.pesticides.gov.uk/garden/prodsearch.asp

https://secure.pesticides.gov.uk/garden/ProdList.asp

https://sitem.herts.ac.uk/aeru/ppdb/en/search.htm

https://www.echa.europa.eu/information-on-chemicals

https://www.ewrs.org/

https://stateofnature.org.uk/