

LONDON BOROUGH OF CAMDEN	WARDS: All		
REPORT TITLE Use of pesticides in public realm			
REPORT OF Director of Recreation			
FOR SUBMISSION TO Culture and Environment Scrutiny Committee	DATE 6 th February 2024		
<p>SUMMARY OF REPORT</p> <p>The London Borough of Camden manages public realm space across parks, highways and housing estate land. As part of this responsibility, the council undertakes an integrated weed management approach, which includes the use of herbicide in some circumstances. This report outlines the council’s current approach to the use of pesticides, and Glyphosate in particular, and some of the associated issues.</p> <p>Local Government Act 1972 – Access to Information</p> <p>The following documents have been used in the preparation of this report:</p> <p>Contact Officer:</p> <table> <tr> <td>Darrell Abercrombie Green Space Operations Manager Green Spaces London Borough of Camden 5 Pancras Square London N1C 4AG Telephone 020 7974 8815 darrell.abercrombie@camden.gov.uk</td> <td>Clive West Senior Environmental Services Officer Environmental Services London Borough of Camden 5 Pancras Square London N1C 4AG Telephone 020 7974 6769 clive.i.west@camden.gov.uk</td> </tr> </table>		Darrell Abercrombie Green Space Operations Manager Green Spaces London Borough of Camden 5 Pancras Square London N1C 4AG Telephone 020 7974 8815 darrell.abercrombie@camden.gov.uk	Clive West Senior Environmental Services Officer Environmental Services London Borough of Camden 5 Pancras Square London N1C 4AG Telephone 020 7974 6769 clive.i.west@camden.gov.uk
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<p>RECOMMENDATIONS</p> <p>That the Committee note and comment on the contents of this report</p>			

Signed:



Date: 26th January 2024

1 Introduction

- 1.1 This report sets out the current approach and rationale for controlling weeds across Camden and the use of pesticides to achieve this.
- 1.2 Camden's approach to pesticide use in the public realm looks to balance the effectiveness, regulatory, environmental and financial issues of weed control across the borough. It is characterised by an Integrated Weed Management approach, using multiple methods as appropriate to difference specific circumstances and minimising the unnecessary use of pesticides.
- 1.3 Glyphosate is licensed in the UK until 2027. Its use is monitored and reported on by a range of agencies including the Health and Safety Executive to ensure it is safe and fit for purpose.

2 Scope of the report and definitions

- 2.1 The scope of this report is the use of pesticides, and specifically Glyphosate, in the management of weeds on Camden land. This includes weed management in parks, on housing estates and highway land. It does not extend to consideration of other forms of pesticides which may be used in other Council functions.
- 2.2 Glyphosate is an active substance used in Plant Protection Products to control undesirable vegetation, which means it's an herbicide (commonly known as weed killers). It is widely used in agriculture, horticulture and some non-cultivated areas. It is also the active part of many domestic herbicides on general sale.
- 2.3 Camden's use of glyphosate is tightly restricted to non-cultivated areas (paths and hard surfacing), and the removal of invasive species (specifically Japanese knotweed) or to control regrowth from roots or stumps. Camden does not use glyphosate (or other pesticides) on green areas, including grass, shrubs, hedges and flowerbeds.

3 Why do we need to control weeds?

- 3.1 It is the nature of plants to colonise the soil of pavements. Plants become weeds when they adversely affect the functionality, safety or aesthetic value of pavements, and other hard standing areas. As a result, landowners or those with the responsibility to ensure that the area is safe for public use have to apply weed control measures to manage the problem.

3.2 If detritus (mud, soils, grits) is allowed to accumulate on a surface, it will only be a matter of time before weeds will grow. It will begin to colonise the sand-filled joints or settle onto accumulated detritus.

3.3 The risks of not managing weeds include:

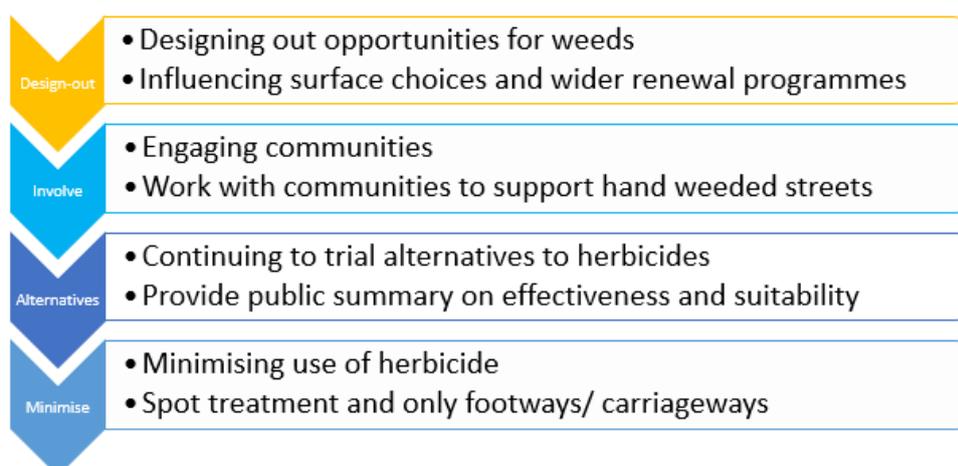
- People tripping and falling, which along with injury can lead to third party claims as a result of slipping hazard or as a result of the weeds or damage to footways pushed up by weed growth
- Unsightly and unkempt look of the streets
- Undermining the structural integrity and foundations of the paving stones as weeds normally grow in the joints and cracks
- Undermining asphalt footways and cause them to break up more rapidly
- Undermining adjacent walls to the highway

3.4 The role that Camden plays, as a manager of public land, in relation to the control of those weeds covered by the Weeds Act 1959 is to take the appropriate steps to control their growth and to help prevent their spread. Our current approach is stated below. The new highways contract includes joint sealing to design out issues with weed growth on highways – this will help further reduce our use of Glyphosate.

3.5 There are legislative drivers that may impact on a borough's weed management approach, including; EU Directives setting out requirements for the evaluation of risk relating to pesticides and the sustainable use of pesticides, and; the Weeds Act 1959, which requires the occupiers of land to control the spread of certain 'injurious' weeds.

4 How do we currently control weeds?

4.1 The principles Camden uses for weed management, and minimise use of pesticides, is set out below.



4.2 Regular, effective street sweeping helps suppress weed growth as it removes detritus (mud, grit and soil) and removes seeds from cracks and joints before they are able to germinate. Those weeds that have newly germinated can also be manually removed through sweeping, thus reducing the need to treat with herbicide. Veolia deliver a full

street sweeping service, which results in the continuous removal of detritus. Street cleansing operatives are also supplied with hoes for weed removal as part of their scheduled street sweeping. Camden does not use any other herbicide and has been employing manual techniques for improving turf rather than using selective herbicide for over 10 years.

4.3 Most public spaces (such as streets, housing estates and parks) within Camden are covered by weed control practices. A variety of treatments are used, which are timed to coincide with the expected weed growth, enabling maximum control (see Figure 1 below).

Figure 1: Weed Control Methods across Camden

Areas	Chemical Control (Glyphosate)	Hand Weeding
Public Highway	Approximately 730 streets (3 times per year)	Supports the chemical control across Camden's streets
Parks and Green Spaces	76 Sites – paths and hard standing areas only (not used on shrub beds) (3 times per year). Also used for removal of invasive species (e.g. Japanese knotweed)	Used in all green and planted areas within park sites
Housing	More than 250 sites – paths and hard standing areas only (not used on shrub beds) (3 times per year). Also used for removal of invasive species (e.g. Japanese knotweed)	Used in all green and planted areas within housing sites

4.4 Weed removal on streets is currently part of the council's Environmental Services contract with Veolia, and weed removal in green spaces and on housing estates is part of the council's Grounds Maintenance contract with idverde. Both apply an integrated approach, combining minimal herbicide use with manual/hand weeding.

4.5 Camden's use of glyphosate is minimal and targeted (which means it is applied to specific weeds - we do **not** broadcast spray at any Camden site) and completed by trained operators. Camden currently uses glyphosate to:

- Control weeds on hard standing in parks, estates and on highways.
- Treat invasive weeds such as Japanese knotweed, with an aim to eradicate
- Treat tree stumps to avoid regrowth

4.6 Camden does **not** use glyphosate for the control of weeds in planted areas (flowerbeds and shrub beds), lawns and areas of grass, tree pits or nature conservation areas (except where necessary for the treatment of Japanese knotweed).

Invasive species

4.7 When treating invasive weeds, treatment is predominantly used to address Japanese Knotweed. Camden has a legal responsibility to prevent the spread of knotweed from our land. There are several treatment processes used to control Japanese Knotweed, these include injecting the plant directly with glyphosate, spraying the plant, leaf wiping and excavation. We have been working with our term contractor to develop an effective management process for dealing with Japanese knotweed. The process currently engaged in Camden is to manually remove the Japanese Knotweed crowns and all visible rhizome and dispose of them as controlled waste. The contractor then returns and treats any regrowth with glyphosate. We have found this procedure to be effective in the treatment of Japanese Knotweed, with an aim to eradicate, and this process also reduces the volume of glyphosate used. Herbicide application is currently a recommended Environment Agency approach to invasive species and glyphosate is included on the Health and Safety Executive approved chemical list.

Paths and hard surfacing

4.8 Weeds in hard standing areas that are covered by the Grounds Maintenance contract are currently managed by herbicide targeted treatment. Camden uses, where practicable, an integrated approach to managing weeds on these areas, applying three hard surface herbicide applications a year. These applications take place in April, June and September; however, treatments may, from time to time, be added, removed or delayed depending on the site conditions. This method is used to maintain hard standing infrastructure cost effectively and to maintain the aesthetics and accessibility of the site.

4.9 Our current approach to hard surface herbicide application on housing and parks is in line with [DEFRA's Best Practice Notes for Integrated and Non-Chemical Amenity Hard Surface Weed Control](#). This guidance was the result of a five-year scientific study commissioned by DEFRA, run by East Malling Research and hosted by Kent County Council on the streets of Thanet. It studied amenity use of herbicide, non-herbicide and integrated approaches to weed removal.

4.10 Three times a year Keep Britain Tidy carry out a similar local environmental quality survey for the borough. From this survey, over the past 3 years, the general picture for weed growth in Camden is 'satisfactory', with residential areas and alleyways suffering

most from adverse growth. There has been a dramatic improvement in 2023/24 for weeding scores, which mirrors the improved detritus scores. This shows a clear correlation between the build-up of detritus and weed growth. Reductions in herbicides can be attained by high standards in street cleansing.

Figure 2: Areas of hard standing across Camden covered by weed management.

Total area is not currently sprayed but indicates the size of the assets managed.

Hard Standing Spray Meterage	
Customer	Area (m2)
Housing	694,196
Corporate Property	5,652
Education	295
Green Spaces	116,395
Temporary Accommodation	2,004
Highways	291,105 (linear metres)

5 How much glyphosate does Camden use?

Figure 3: Usage of glyphosate in litres used by Camden Grounds maintenance term contractor, as per land use in Figure 2.

Usage covers both spot treatment across hard standing and invasive species treatment.

Year	Herbicide	Litres
2019	Glyphosate Roundup-Pro	501
2020	Glyphosate Roundup-Pro	507
2021	Glyphosate Roundup-Pro	512
2022	Glyphosate / Gallup	452
2023	Glyphosate / Gallup	458

Figure 4: Herbicide use by Environmental Services term contractor

Year	Herbicide used (in litres)	Cost
2018	340L	£6,800
2019	250L	£5,500
2020	280L	£6,000
2021	290L	£6,500
2022	100L	£5,100

6 European Union (EU) position on use of glyphosate

6.1 There have been recent debates in the EU Parliament and elsewhere expressing a range of opinions on the use of glyphosate and pesticides more generally. Before coming to market, any chemical for use in weed, pest and disease control has to go through an extensive approval process under EU regulations which considers every aspect of the safety of the product and the risks of using it as well as its effectiveness. Camden is keeping our use of glyphosate under review as a result of these debates, and we will reconsider our approach in the light of any future changes to the EU Directive and/or Government guidance. In the meantime, however, we will continue to adhere to current DEFRA and EU guidelines for the essential processes outlined in this report.

6.2 Glyphosate is currently approved in the EU until 15 December 2033. On 12 December 2019, the Glyphosate Renewal Group (a group of companies seeking the renewal of approval of glyphosate in the EU), [although the validity of the evidence used by the group has been questioned](#), sent an application for the renewal of approval of glyphosate post-2022¹. The European Food Safety Authority (EFSA) launched a public consultation during 2021, and additional information was requested of the applicant as a result of comments received. A conclusion from the EFSA was delivered in July 2023 followed by a Member State vote in October 2023, which did not deliver an opinion on the proposal (there was no qualified majority either in favour or against). A subsequent referral to the Appeal Committee similarly failed to deliver an opinion. As a result, the European Commission adopted an Implementing Regulation to renew, for 10 years, the approval of glyphosate.

6.3 The current weed management process including herbicide application has been informed by [DEFRA's Best Practice Notes for Integrated and Non-Chemical Amenity Hard Surface Weed Control](#).

¹ https://ec.europa.eu/food/plant/pesticides/glyphosate_en

6.4 Camden's contractors only use UK authorised products. Products are glyphosate based as they are only effective on actively growing plants. Other basic legal requirements include application by competent, trained operatives and following label instructions.

7 Concerns about the use of glyphosate

7.1 The Health and Safety Executive addresses the concerns and use of glyphosate saying "The UK has" a rigorous approvals process for pesticides. The main aim of the process is to protect the health of people, creatures and plants and to safeguard the environment. All companies wishing to obtain approval for their pesticides are required to submit substantial data dossiers to support their applications. The extensive range of studies undertaken on pesticides is aimed at establishing acceptable safety for people, animals and the wider environment. This process has been applied to glyphosate which has been approved as safe and efficacious for a number of years now".

7.2 Camden council has been approached by individuals and campaign groups calling for a ban on its use of glyphosate for the purposes of weed control and horticultural management. At the same time, the Pesticide Action Network UK (PAN UK) launched a campaign for pesticide free towns and cities (PAN UK, 2016)².

7.3 In 2015, the World Health Organization's International Agency for Research on Cancer (IARC), the gold standard in identifying carcinogens, [concluded](#) that glyphosate "probably causes cancer in humans". In the same categorisation (2A) as glyphosate were activities such as night shift work and eating red meat³. This was based on "limited" evidence of cancer in humans (from real-world exposures that actually occurred) and "sufficient" evidence of cancer in experimental animals (from studies of "pure" glyphosate). There are a significant number of legal cases across the world relating to Glyphosate. Camden will continue to review DEFRA's guidance on the use of Glyphosate.

7.4 Cost implications will vary depending on the alternative methods used. Attempts to achieve a similar level of weed removal to the current approach from alternative means are likely to be more expensive, depending on the method. For example, when trialling withdrawal of herbicide use from hard standing on some housing estates in 2019, the cost for manual weeding was five times greater than that for the existing herbicide use.

7.5 Recent summers have been among some of the wettest and, warmest recorded. These conditions increase the quantity of and speed at which plants, including weeds, grow.

7.6 If weeds are left in situ, costs are reduced in the short term, but are likely to be accrued in the medium to long terms as a result of damage caused to paving and surfacing because of unchecked vegetation growth.

² [Pesticide-Free London - Pesticide Action Network UK \(pan-uk.org\)](#)

³ <https://monographs.iarc.who.int/list-of-classifications>

7.7 Camden has a number of park sites, particularly the London Squares in the south of the borough, which have large areas of York stone. These sites in particular experience higher levels of weed growth in hard standing due to the increase in cracks and joints from old pointing. Repairing pointing is an expensive task and can often be exacerbated by additional damage from manual weed removal and inclement weather. Were Camden to maintain all hard standing in parks free from herbicide, a capital project to repair/replace the pointing at these sites would need to be considered beforehand to ensure the hard standing is in a good condition.

7.8 Hand weeding is also not appropriate for weed control on cobbled streets. Overtime hand weeding will remove the mortar between the cobbles. For this reason chemical weed control is used on the borough's 69 cobbled streets.

8 Alternative approaches

8.1 Unlike most other pests and diseases, weeds can be physically managed without the use of pesticides. The issue is in removing the weeds selectively without damaging the environment. The choice of weeding method that is put into practice should depend in part on the type of surface being treated and its surrounding environment. However, overriding factors such as operating costs and labour requirements play an important role when choosing a direct weed control method.

Figure 5: Summary of weeding approaches

Method	Use on	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.	Expensive initial purchase Additional cost of plant oil extract, diesel consumption, and air pollution. Needs access for vehicle. Regrowth can be quick.
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 air pollution

Method	Use on	Advantages	Disadvantages
Propane / Flame gun	Weeds on hard surfaces	Relatively cheap to purchase	Health and Safety Risks. Not particularly Effective. Air pollution and smell.
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. Can cause damage to infrastructure.
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 birds.	Can be expensive.
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.
Weed it	Weeds in hard surfaces- sensor units detect the presence of weeds and triggers the appropriate spray nozzles to apply accurately, the correct amount of herbicide to the weeds.	Lower amounts of herbicide, Targeted	Limited by obstacles

Hand Weeding

8.2 Direct weed control consists of both mechanical and manual hand devices. This method comprises the removal of weeds with a hoe, removing the head of the plant (hard surfaces) and often leaving the plant's root undisturbed.

8.3 This process can impact on the condition of the pavement, by removing fill material, resulting in unstable paving and potential trip hazards. Figure 6. below lists some of the advantages and disadvantages of hand weed control.

Figure 6: The advantages and disadvantages of hand weed control

PROS	CONS
Hand weeding is most effective if scheduled on a regular basis so that weed populations are kept to a minimum.	Hand weeding can be ergonomically strenuous, and requires careful considerations around manual handling.
Effective on annual weeds and certain perennial weeds that usually do not regenerate from underground parts.	In the case of perennial weeds that have an extensive root system, numerous sessions of hand weeding will be required.
	More labour required than other direct weed control methods – costly method.
	The method requires adequate soil moisture to ensure that weeds can be easily pulled / removed.
	Can contribute to increased damage to surfacing, increasing capital repair requirements

Foamstream

8.4 Camden was invited by London Borough of Hackney (Hackney) to observe a trial of the foam stream system for killing weeds. The foam stream system uses foam to transport heat into the plant and roots to kill the plant. The trial took place on 1 site and 1 treatment was completed. The treatment took a long time, as long as manual removal. The difference to manual removal is that there is no damage to the infrastructure from a metal hoe head. A negative observation was that the weeds grow back very quickly which indicates that the roots were not killed by the treatment. London Borough of Hammersmith and Fulham use this approach. We are closely monitoring the system and will look to complete a trial with our neighbouring boroughs.

8.5 The London Borough of Hammersmith and Fulham banned the use of products containing glyphosate, for grounds maintenance and housing stock, in June 2016. They worked closely with their contractor, Idverde, to trial various alternatives including flame burners, acetic acid and hand weeding before deciding on the Foamstream system. As a result there are now five Foamstream machines used in Hammersmith and Fulham – three for housing sites and two that are used in parks and green spaces.

8.6 Camden subsequently trialled the use of hot foam. In 2019 Crabtree Fields was selected as a trial site. The site was selected as there was weed growth on the hard standing and a significant proportion of the site is made up of hard standing, which includes a mix of paving and compacted aggregate. This trial site had to be changed as the vehicle used to undertake the foam application could not access the site. The trial was relocated to Bloomsbury Square which contains a significant hard standing area made of York stone. The trial started in 2019 and included 3 applications of hot foam in April, May and August. The trial was suspended in 2020 due to Covid. The trial continued over 2021, 22 and 23. The foam did not address the weeds and there was significant weed growth throughout the growing season. The sites hard standing has been repointed in 2023 at a cost of £20k. The trial and mitigating works has highlighted the need to design out cracks and joints in new hard standing designs.

8.7 The success of hot foam (Foamstream) seems to be impacted by the correct application of it, if not done correctly it will not achieve the desired effect. Feedback from Glastonbury, who have been herbicide free since June 2015, shows that:

- It does kill the weeds effectively if it is used properly, but it's not as easy.
- It needs two members of staff, and is time consuming, probably taking around 10 times longer than weed killer spraying.
- Then the team needs to return a few days after spraying to scrape up the dead weeds.
- It should be used once a week, but caretakers are often too busy, particularly in the summer months when it is needed most.
- Some are powered by diesel engine, and stored on trailer which is towed by tractor when in use, so does have a local environmental and carbon impact. (there are hybrid versions now available).
- Running costs of labour, diesel for engine and tractor, water.
- Once established weeds have been properly treated and removed, regrowth is easy to manage.

8.8 Hot Foam has additional benefits that:

- It can be used all year round
- Is not affected by wind or rain, as herbicides are, which is becoming more prevalent with climate change and increased wind and rain experienced.
- It is nontoxic so can be used in any location, at any time, limited only by a short period when the foam is hot after initial applications.
- It can be used near waterways and drains, where general application herbicide cannot.

- It can be used to cleanse other issues such as staining, graffiti, flyposting so its cost can be spread out to include other areas.
- It could be a shared resource with other boroughs, for example North London Waste Authority (NLWA) members, reducing costs
- It is not controversial, reducing complaints and members enquiries
- It has a sustainable future in regard to a method, whereas herbicides will only have an increased risk of controversy related to the toxic nature and growing public and industry kickback.

Designing out (tarmac)

8.9 Camden Green Spaces, wherever possible, design hard standing repairs and improvements to reduce or remove the need for herbicide this is a successful and popular approach. An example of this approach is at Camden Square where the footpaths were re-laid with tarmac. This removed the cracks and joints from the footpaths and has supported Camden Square becoming herbicide free.

No Spray areas

8.10 Hard standing management without herbicide was trialled in Camden Square the adjacent estate and the surrounding highways in 2013 and the trial was extended in Spring 2014. The non-chemical, manual trial at Camden Square failed to kill the weeds which quickly recovered causing a deterioration of the surface and making the site look unmaintained, which was a cause of great concern for local residents. It was decided at a public meeting led by the local Councillor that Camden should start to use herbicide to address the overgrown weeds.

8.11 A further trial was undertaken on five parks in 2019 to further test the impact of withdrawing herbicide use. This was successful on sites with good quality surfacing which had limited opportunity for weed growth and these sites were subsequently removed from the spray regime. However, it was more problematic on sites with lower quality paving, leading to problems navigating safely and further deterioration of already damaged paving.

9 Benchmarking with other authorities

9.1 The weed control measures employed by other boroughs are varied. However, many of them use glyphosate-based herbicide to control weeds on hard standing and for the control of invasive species. The list below shows some recent boroughs decisions and position on the use of herbicide.

- Brighton and Hove - Banned the use of glyphosate in 2019 but is to reconsider its policy after finding manual removal ineffective on 23rd January 2024. [Brighton & Hove City Council reconsiders use of weedkiller after ban - BBC News](#)
- East Sussex County Council at the end of 2023 have approved the use of glyphosate-based products to treat weeds on the authority's highway network.
- Hackney Council; use glyphosate-based products on some hard standing areas. They have been working to reduce the use since 2018.
- Cardiff - "An independent scientific report assessing three different types of weed killer to manage plant growth on Cardiff's highways and pavements has concluded that glyphosate is "the most effective and sustainable weed control method currently available." [Results of Alternative Weed Control Trial Published \(cardiffnewsroom.co.uk\)](#)
- Bath - stopped using - moved to manual and mechanical - <https://beta.bathnes.gov.uk/clean-and-green-bath-north-east-somerset>
- Lewes - Foamstream – tightly controlled process to allow herbicides, see table appendix 1.

9.2 France has banned pesticides from most areas of public life: The pesticide ban in France was [extended](#) to cover additional spaces. We are continuing to review this position and impact as recent media coverage has indicated a limit to the impact of this announcement⁴.

10 Future approach

10.1 Camden is keeping our use of glyphosate under review as a result of current debates, and we will reconsider our approach in the light of any future changes to the EU Directive and/or UK Government guidance. In the meantime, however, we recommend continuing use in adherence to current DEFRA and EU guidelines.

10.2 We will continue to evaluate alternatives to Glyphosate against the cost, effectiveness, practicality and environmental impact.

11 Finance Comments of the Executive Director Corporate Services

11.1 This report outlines the council's current approach to the use of pesticides and some of the associated issues. Camden's contractors only use UK authorised products, however, the service will continue to review the use of pesticides, especially the use of glyphosate.

11.2 Cost implications for alternatives will vary depending on other methods used. A financial evaluation has not been carried out for alternative options in pesticide use at

⁴ <https://www.politico.eu/article/france-emmanuel-macron-broken-glyphosate-promise-herbicide-european-parliament>

this stage. A further report will be drafted to Executive for consideration should alternative proposals be considered.

12 Legal Comments of the Borough Solicitor

12.1 Legal Comments are incorporated.

13 Environmental Implications

13.1 Glyphosate was first used in the UK in the mid 1970's. Its use and regulation are carefully monitored to ensure environmental risks are addressed. It is widely used as alternative herbicides such as selective herbicide can be replaced by other manual processes and often have associated environmental risks. The risk of non-targeted spraying and unintentional environmental damage is mitigated in Camden by ensuring the following requirements are followed:

- Targeted spraying will only be undertaken on specified areas of hard standing weeds and invasive species.
- No broadcast spraying will be instructed.
- No selective or residual herbicide will be used.
- The applications of herbicide will only be undertaken by professionally trained persons who hold a recognised qualification for the task they are undertaking.
- All equipment will be stored and maintained in line with the manufacturers guidelines and storage regulations.
- Treatments on hardstanding will take place 3 times per year unless instructed by an authorised Camden officer.
- Applications will only be undertaken during suitable periods of weather to reduce run off.
- Hardstanding design and repairs will where possible design out the need to use herbicide.

14 Appendices

Appendix 1- Lewes and Eastbourne Process

Appendix 2 – Camden Environment Service Current Position on Glyphosate

REPORT ENDS

Appendix 1

Lewes/Eastbourne process
1. Before permission is given for any pesticide application on land under our management, we will:
2. Consider whether any action is required, i.e., do we need to control the weed or pest etc?
3. Ensure that the pest, weed, fungus has been correctly identified.
4. Identify any non-pesticide control options and use these as a first choice.
5. Look at whether any integrated control measures are available as a second choice.
6. Look at using an approved pesticide ONLY if the above options are not suitable.
7. Look at what alternative pesticides are available.
8. Look at what would be the most “environmentally friendly” way to apply the pesticide.
9. Consider whether it is an appropriate time of year to apply the pesticide/control the problem.
10. Look at whether the risks of using a pesticide are greater than the problem itself?
11. Consult the product data to ensure there is no specific environmental risk? e.g., a risk to bees, water courses.
12. Ensure that there are no other environmental considerations? i.e., adjacent water course, wildlife (Environmental Assessment).
13. Consider whether, after any one-off application of a pesticide, there are there any other long-term non-pesticide solutions for the problem.
14. Obtain any higher level permission required such as that from the Environment Agency or Natural England.

Appendix 2

Camden Environment services current position on Glyphosate

Background

Weed growth can have a serious negative impact to an area. If left unmanaged, weed networks can break up pavement surfaces (potentially tripping up pedestrians), trap litter and crowd out local plant life. Most public spaces (streets, housing estates, parks) within Camden are covered by weed control practices. The treatment of weeds is timed to coincide with the expected weed growth, enabling maximum control.

Reducing the use of herbicides

A street-based weed spraying programme is carried out 3 times a year and weeds on streets are controlled chemically. The council's operatives do not use chemicals indiscriminately - but only in response to specific weed growth on hard standings like the pavements, roads and paths that we have an obligation to maintain and keep weed-free. The council does not use chemicals for the control of weeds (except Japanese knotweed) in tree bases, flower beds, on lawns, or in nature conservation areas within the borough.

The active ingredient in the weed killer used by our contractors is a herbicide known as glyphosate. Glyphosate is the active ingredient in many over the counter weed killers intended for home use, and is currently approved by the EU, Defra and the Health and Safety Executive.

Camden keeps these approvals under regular review and should the official advice change we will update our practices. Our contractors are continually working to reduce the amount of glyphosate they use and have shown year on year reductions.

Camden has an aim to reduce its use across housing land, parks and open spaces. This aims to reduce the amount of chemicals used, and, where possible, includes the design of 'hard surface' (paving) repairs and improvements to reduce or remove the need for herbicides in the future. For example working with a local community to remove an underused area of hard surface and replace it with a green area.

This approach to hard surface herbicide application, on housing and parks hard standings, is in line with DEFRA's Best Practice Notes for Integrated and Non-Chemical Amenity Hard Surface Weed Control.