
Community and Stakeholder Engagement Report

Pesticide Use Notification Plan

Consultation period: Friday 25 August to Sunday 24 September 2023

Contents

1.	Summary.....	2
1.1	Key outcomes	2
1.2	How we engaged	4
1.3	Who responded.....	4
2	Background.....	5
3	Engagement objectives	5
4	Engagement approach	5
4.1	Reaching diverse audiences	5
5	Findings	6
	Appendix 1 Verbatim community and stakeholder responses	11

1. Summary



This report outlines the outcomes of community and stakeholder engagement on the review of the Pesticide Use Notification Plan. The community was invited to make submissions on the plan, which deals with the statutory notification of pesticide use by Council. We received a strong response from the community with 33 submissions via our Your Say webpage and 12 emails, of which one was a duplicate submission.

The feedback collected during consultation indicated there is concern among the community about the use of pesticides in general. The concerns relate to both environmental impact as well as community and personal safety. Council shares the concern and applies an Integrated Pest Management approach, whereby a variety of non-chemical methods are utilised, to reduce pesticide use.

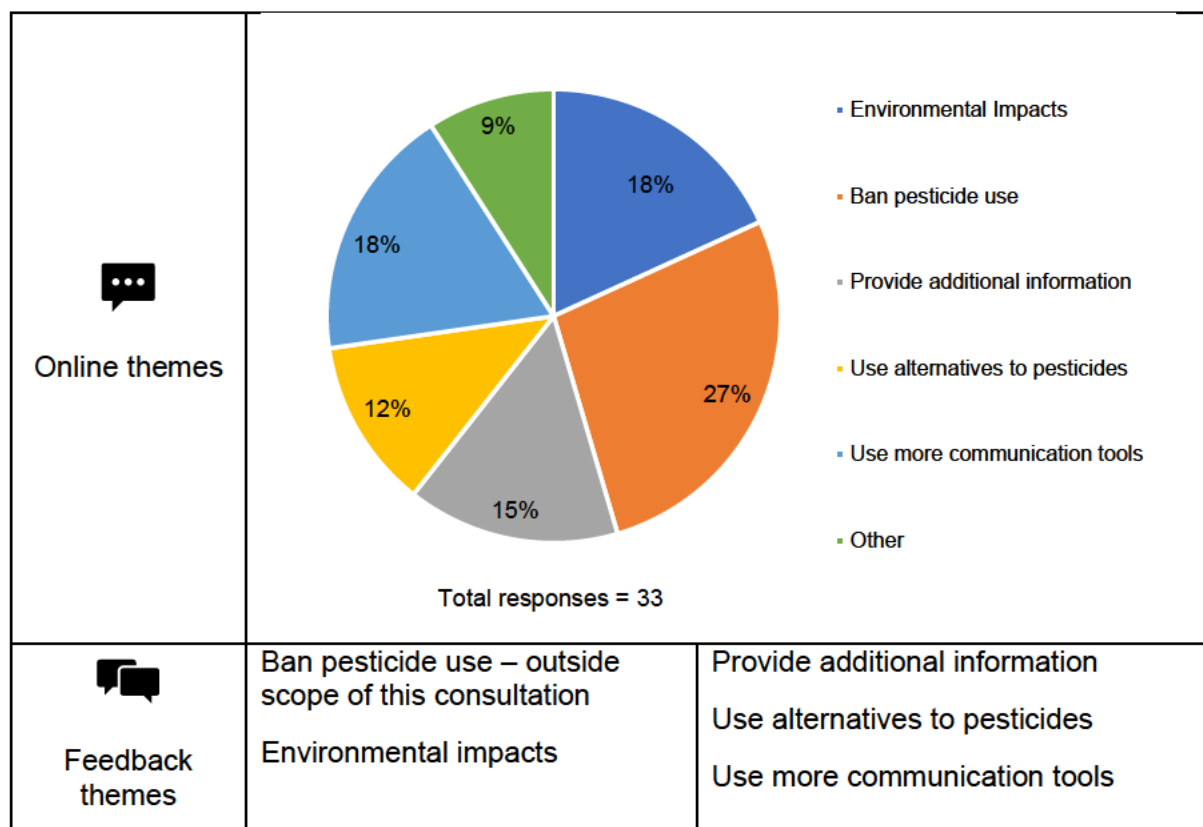
Pesticides are, however, an important component of our pest management programs and greatly assist in being able to meet community needs and expectations in relation to public open spaces, facilities and natural areas. We have processes and practices in place to ensure that our use of pesticides is undertaken as safely as possible, with minimal environmental harm, and in accordance with relevant legislation.

Respondents were supportive of being notified of pesticide usage to allow them to make informed decisions about the use of Council assets and public spaces. Feedback suggested Council should consider some improvements, including better signage and broader use of options like social media for notification of pesticide use. Submissions also requested use of some additional notification options as well as providing additional information on pesticides.

1.1 Key outcomes

 Total unique responses	44*	
 How responses were received	Submission form Written responses (email/letter)	Completions: 33 Number received: 13

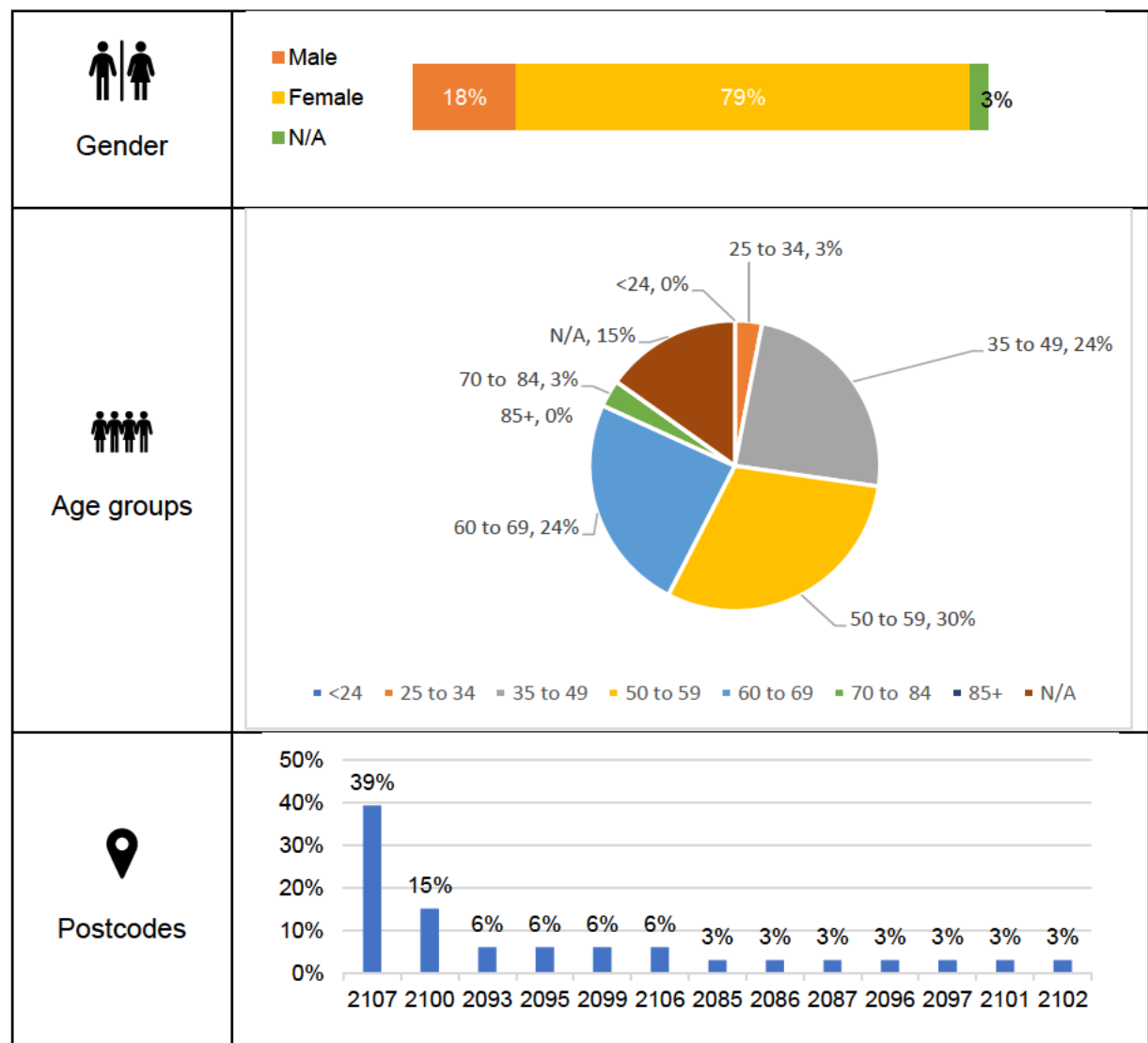
*Duplication existed between online submissions and email responses. Duplicated submissions were only counted once.



1.2 How we engaged

 <p>Have Your Say: visitation stats</p>	Visitors: 526	Visits: 684	Average time onsite: 1 min 10 secs
 <p>Electronic direct mail (EDM)</p>	Community Engagement (fortnightly) newsletter: 2 editions Council (weekly) e-News: 1 edition Stakeholder email: 2		Distribution: 23,500 subscribers Distribution: 61,500 subscribers

1.3 Who responded¹



¹ Demographic data was gathered by request only. The data represented only includes those respondents who provided this detail.

2 Background

Under the provisions of the *NSW Pesticides Regulation 2017* (the Regulation), Council is mandated to provide advance notice of pesticide applications in public spaces. This entails the development of a Pesticide Use Notification Plan outlining how the public will be informed about such pesticide usage.

This new plan seeks to streamline the notification practices employed by the former Manly, Pittwater, and Warringah Councils. The Pesticides Use Notification Plan and outcomes of community engagement will be presented to Council.

3 Engagement objectives

The purpose of community engagement on this project was to inform the community about the new, streamlined Pesticide Use Notification Plan. Specifically, the focus was on seeking feedback solely pertaining to the Pesticide Use Notification Plan, rather than soliciting general feedback on pesticides and pesticide usage by Council.

The community and stakeholder engagement aimed to:

- build community and stakeholder awareness of the new Pesticide Use Notification Plan.
- provide accessible information, via multiple channels, so community and stakeholders can participate in a meaningful way.
- provide balanced and objective information to assist community members in understanding the plan update.

4 Engagement approach

Community and stakeholder engagement for the Pesticide Use Notification Plan was conducted between Friday 25 August and Sunday 24 September 2023. It consisted of a series of activities that provided opportunities for community and stakeholders to contribute.

The engagement was planned, implemented and reported in accordance with Council's [Community Engagement Strategy](#) (2022).

A project page² was established on our have Your Say platform with information provided in an accessible and easy to read format.

The project was primarily promoted through our regular email newsletter (EDM) channels.

Feedback was captured through an online submission form embedded onto the have Your Say project page.

An open-field comments box provided community members a space to give any feedback they wished to contribute, including the option to upload larger submissions.

Email and written comments were also invited.

4.1 Reaching diverse audiences

A thorough stakeholder mapping exercise was completed to identify and understand the needs of the whole community.

² <https://yoursay.northernbeaches.nsw.gov.au/pesticide-use-notification-plan>

It was determined for this project that it was particularly important to hear from sporting groups who use the Council playing fields.

5 Findings

Councils are required to have a Pesticide Use Notification Plan (PUNP) in accordance with the *Pesticide Regulations 2017*. The intent is to appropriately inform the public about Council's use of pesticides.

Several responses pertained to Council's use of pesticides in general, such as using alternatives or banning the use altogether. These submissions were ultimately outside of the scope of the PUNP and the engagement.

For general information however, Council uses an Integrated Pest Management (IPM) approach to managing problems with pests in our area. An IPM approach relies on using a combination of practices and control methods to manage problems with pests. Control methods include:

- **Biological control:** using virus release to control rabbits, salvinia weevils to control salvinia;
- **Cultural and physical control:** using methods such as barriers and traps; mowing and slashing; hand removal; and
- **Environmental control:** planting out with native species, mulching garden beds and around trees.

These techniques are utilised where possible to reduce the need to apply pesticides in public places. Given the significant amount of area pests can impact however, the responsible use of appropriate pesticides is an important component of an integrated approach.

The use of 1080 for vertebrate control was raised in multiple submissions. Council implements an integrated best-practice management program to control foxes and follows the lead of the peak bodies specialising in invasive species including the Department of Primary Industries and Local Land Services who administer all control programs under the Biosecurity Act 2015. In the past few years Council has reduced the number of 1080 sites significantly.

Council is aware of current research around emerging potential control methods such as fertility control, genetic or habitat manipulation, the use of non-toxic spray deterrents, ultrasonic animal or olfactory repellents, shepherd dogs and sprinklers. To date, these methods are either not available in Australia and/or not practical in terms of managing a large number of reserves and/or not compliant with the Biosecurity Act 2015 (or the Biodiversity Act 2016). Council is willing to incorporate new control techniques should they arise particularly where they are demonstrated to be both effective and humane.

Other chemicals specifically identified in submissions were glyphosate and second-generation anticoagulant rodenticides (SGARs). Council has reviewed our use of these products and changed practices to reduce risk to public health and the environment. SGAR use is currently being phased out and the application of glyphosate does not occur in publicly accessible areas. Glyphosate can be used in areas where there is limited public access, such as in bush regeneration, and utilising techniques such as cut and paste that do not result in an off-target impacts.

It should be noted that the PUNP is not the only documentation that controls the use of chemicals. Council's Hazardous Chemicals Program provides the framework for the safe

management of hazardous chemicals. A risk management approach is used within Council to eliminate or control hazards arising from the selection, use, handling and storage of hazardous chemicals.

Our practices and use of products change as new information about existing products, or more suitable and effective alternatives, become available, such as noted in relation to SGARs and glyphosate. Chemicals are reviewed in these circumstances, in accordance with the Hazardous Chemicals Program.

Community members made several suggestions that would improve notification. Council recognises there is opportunity to improve the use of social media as a vehicle for communicating where and when we may be applying pesticides. We will work with our Media and Communications Teams to improve the use of social media options.

Improving the visibility of signage was another suggestion council recognised would be of benefit. Often there are no well-defined entry and exit points to spaces where pesticides are being used. Signage must be sufficiently obvious to make the public aware of any spraying activities in a particular area.

Table 1: Issues, change requests and other considerations

Theme	Issues, change requests and other considerations raised	Council's response
Ban Pesticide Use	<ul style="list-style-type: none"> • Submissions requested Council ban use of pesticides in general as well as identifying specific pesticides for banning, such as Glyphosate based products and 1080. • Submissions questioned rodenticide use, specifically SGARs • Reference was made to Councillor Glanville's Notice of Motion at the October 2022 Council Meeting. 	<ul style="list-style-type: none"> • Council is not the responsible authority for banning pesticides. Whilst this is out of scope for the PUNP, we do change practices including ceasing or limiting the use of certain products if deemed necessary or available information for a product changes. • Council is phasing out the use of Second-Generation Anticoagulant Rodenticides. • A response to the Notice of Motion is anticipated to be provided to the December 2023 Council meeting.
Use alternatives to pesticides	<ul style="list-style-type: none"> • Submissions requested Council use alternative methods to pesticides for pest control or promote trials of alternative methods. 	<ul style="list-style-type: none"> • Council uses an integrated approach to pest management, including use of non-chemical pest control options where they are feasible and effective. • Council can promote trials and outcomes of alternative techniques being used to keep the public informed
Provide additional information	<ul style="list-style-type: none"> • Submission requested information be provided on the impact of pesticides, re-entry 	<ul style="list-style-type: none"> • Products used can vary over time. It is not possible to provide a complete list of all products. Notification includes the name of any product used

	<p>periods and other technical information. Submissions suggested a list of pesticides used be included in the PUNP. There were requests for more detail on planned programs and application dates. It was also suggested notification should be for longer periods.</p>	<p>at the time of use. We also provide product information for our planned programs. This can be used to search for Material Safety Data Sheets or registered labels which are publicly available and contain all information on matters such as use controls, toxicity and potential environmental impacts or harm. The plan also notes that further information will be available via Customer Service as detailed on signage and Council's website should the public wish to contact council.</p> <ul style="list-style-type: none"> • Information on the Annual Spray Program is provided on Council's website with general timeframes. Specific timeframes cannot be provided due to various changes that can occur in the program, such as due to wet weather. Signage on site will identify a date range of a week for potential applications and is updated on site to include the actual spray date. Signage is only removed after it is safe for the public to enter a site. Signage shall be in place at key entry points to sites.
<p>Use more communication tools</p>	<ul style="list-style-type: none"> • Requests included using social media such as community facebook pages, use of marker dye, mapping and improving the visibility of signage. 	<ul style="list-style-type: none"> • Multiple communication formats are utilised. Social media is identified as a notification measure. • The PUNP identifies that people and organisations can nominate to have their details placed on a central register which would allow them to be directly notified of certain types of pesticide uses in particular places, including near their homes. • The use of dyes is included in the plan, noting it will only be used in vegetated areas and for certain application techniques. They will not be used on hard surfaces such as footpaths, drains and other infrastructure,

		<p>and it is not appropriate to use dyes in broadscale boom spray applications.</p> <ul style="list-style-type: none"> • Pesticides may be used in many locations across the northern beaches. The PUNP states a list will be provided for sites scheduled for programmed applications. We will look to include a map to also highlight locations for the program. • Council shall develop improved signage for utilisation by contractors and staff.
Environmental Impacts	<ul style="list-style-type: none"> • Issues with non-target impacts were raised including harm to bees, pollution of waterways and other aspects of environmental harm. 	<ul style="list-style-type: none"> • The Australian Pesticide and Veterinary Medicine Authority (APVMA) is responsible for the registration of pesticides, including associated labels and directions for use. As noted on the APVMA website 'the directions are designed to protect people, animals, crops and the environment'. Following label directions ensures we are operating appropriately in relation to the safe use of any particular product, including mitigating environmental impacts, as developed by the relevant experts and required by legislation. • Council also employs various practices aimed at minimising any potential off site or non-target impacts.

During the consultation Council received questions either through direct contact or within feedback received. These questions have been addressed in the Table 2.

Table 2: Questions raised and Council's answers

Question raised in feedback	Council's answer
Can bee handlers be used instead of spraying	Council uses the services of bee keepers to relocate hives
What is legal liability if Council doesn't use best practice and a human or domestic animal is killed	Use of pesticides is regulated by the Environment Protection Authority (EPA). Any alleged misuse would be subject to investigation by the EPA.

Appendix 1 Verbatim community and stakeholder responses*

#	Submission
1	Please also consider disinfectants for playgrounds
2	Ban use of ALL pesticides replace with natural floriculture deterrents and complimentary permacultures. Thank you.
3	<ol style="list-style-type: none"> 1. There is no information or transparency on the impact of the pesticides on fauna, flora, wildlife and animals including dogs, bees. This should be published and clearly available to the public. 2. Native wildlife, household pets and waterways are at risk yet none of these are called out as potentially impacted. 3. All communication avenues should be utilised. It is totally ineffective to take a dog for a walk and only find out on the day (and if you're lucky enough to see a solitary sign) that the pesticide spraying has already taken place. 4. I note that bees can be exterminated for emergency pest control reasons. This completely beggars belief given the crucial role bees play in environment, can't they be safely removed and relocated by a qualified bee handler instead? 5. The fox baiting is heinously cruel and outdated. What other humane forms have Council considered?
4	<p>Thank you for the proactive policy. We support notification of key users a month prior to the application.</p> <p>May I also suggest notification on the various Community Neighbourhood Facebook pages (eg North Balgowlah Community Page).</p> <p>It would be useful to notify the overall spray schedule/calendar, the weedicide being used and the timeframe the weedicide is active so that we can also plan for any changes.</p> <p>Many thanks [REDACTED]</p>
5	<p>I feel strongly that residents should be aware of (a) the annual pesticide application plan (b) the specific date that pesticides will and have been sprayed. When pesticides are going to be sprayed it currently seems like a very small sign is positioned in one or two places that gives very rough range of dates telling people to 'keep out'.</p> <p>This is problematic for 3 reasons. 1 not all people will notice the signs where they have been positioned. At Little Manly I have seen only 1 sign and it is positioned far from the pathway where anyone will likely notice it if they don't know to look out for it. 2 The date range is not specific enough. There should be a way to know if the chemical treatment has been done already. 3 the signs indicate that people should 'keep out'. There is not enough done to let people know they need to keep out. Too often I have seen the truck spray and have let people know later in the day that I see using the grass and they are shocked and upset they didn't know.</p>
6	<p>Hello this excerpt:</p> <p>'Except for persons and organisations who have nominated for inclusion in Councils central notification register, Council will not provide notification where the following applies:</p> <ul style="list-style-type: none"> • The use of small quantities of pesticides that are widely available in retail outlets and ordinarily used for domestic purposes (including home gardening)' <p>means that products eg Roundup -and other carcinogens (World Health Org) can be used with no</p>

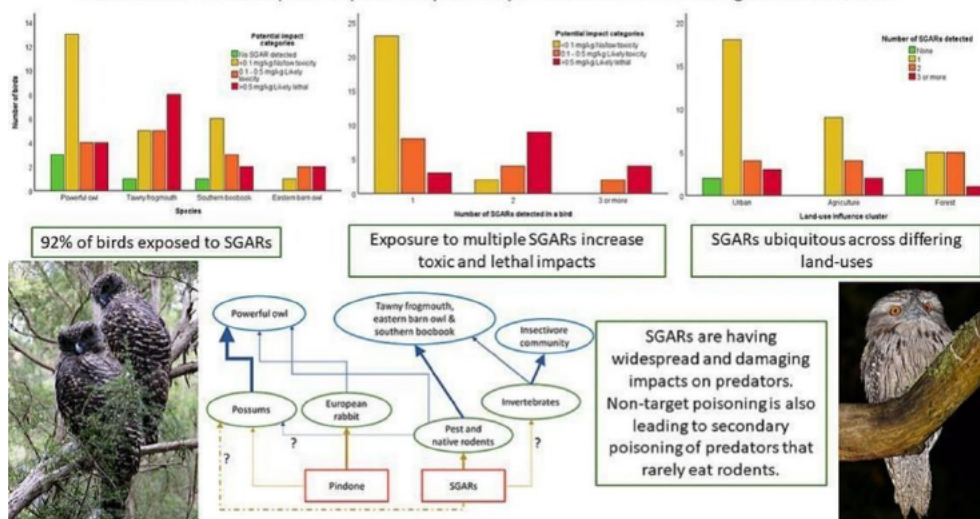
*Personal details and inappropriate language have been redacted where possible. Spelling and grammatical errors have been amended only where misinterpretation or offence may be caused.

#	Submission
	notice given in dog parks and high pedestrian traffic areas eg Kangaroo lane / reserve which is habitat to wildlife yes? I'd love to see this amended as 'small' is subjective and Australia continues to allow sale for domestic use many pesticides banned in other locations in the world eg Europe.
7	It would be productive to notify the community (in the plan's various stated ways - from email, council website, to physical signage) of precisely when and where the less harmful and more environmentally sound products are being used or trialled. This would allow the community the chance to understand more clearly what the range of products are, the risks they may pose, and whether other safer options are being actively pursued by council. People would like complete transparency, as opposed to needing to dig for information that is highly important to their health and the health of their environment. Personally, I'd take a bindie over toxic chemical use any day of the week.
8	<p>It would be valuable to be emailed or texted when spraying of areas near home is done.</p> <p>I have Mast Cell Activation Syndrome and must make sure the townhouse is as airtight as possible when spraying is done.</p> <p>I was in Avalon Wed Aug 30 and spraying was done along the footpath in front of shops! This is exactly what needs to be avoided. If I knew that Avalon shops were to be sprayed, then I would not have gone shopping there.</p> <p>This is a rare condition but can be life threatening.</p> <p>Tweed Council send a text a few days before spraying near our home in Casuarina NSW which gives me time to make things safe. I am on a register of people that need to be informed. Perhaps Northern Beaches Council could adopt something similar. Design a registry of people who have ticked boxed on places they go to ensure being safe when leaving the house. Thank you</p>
9	<p>In regard to the following statements found in The Pesticide Use Notification Plan 2023, I would like to provide this submission on behalf of [REDACTED] 1. 'Northern Beaches Council aims to ensure that pesticides are applied to public places in a safe, responsible, and humane manner, minimising harm to the community and the environment.' 2. 'New techniques are also investigated when they become available or when situations require innovative solutions.(both are from Page 1) [REDACTED]</p> <p>[REDACTED] I would like to make comment on council's reviewed 'Pesticide Use Notification Plan' which is now open for public comment. [REDACTED] does not support lethal population control measures for any animal. 1080 poison especially should be banned immediately. It is a deadly, indiscriminate toxin that kills slowly and painfully, sometimes taking days and is without an antidote. We would like to see a ban on the use and sale of 1080 on the Northern beaches with support for and promotion of alternative, non-lethal control measures instead. We also ask that the use of language that vilifies and encourages a lack of empathy for animals deemed to be a problem to be removed. Terminology such as 'feral', 'noxious', 'vermin', 'invasive' and 'pest' to describe an animal, encourages the belief that their welfare is subservient to the human economy, the environment and native wildlife and encourages cruelty to be aimed at them. We recognise that there is no simple solution to controlling the impact of introduced or 'problem' species but believe that only non-lethal, humane, effective and species-specific methods are acceptable. Current methods used are cruel and non-targeted, often harming native animals, companion animals and the local environment. Please, immediately ban the use of lethal control methods and ensure that methods used to control introduced or problem species to mitigate their damage are non-lethal, humane, effective and species-specific – for instance, deterrence (e.g. small scale, wildlife-friendly fencing; repellents), fertility control, and prevention of further deliberate or accidental breeding, importation and releases. Please lobby for government funding for research into and support for humane fertility and biological population control methods. Promote responsible animal guardianship including keeping companion animals safe in their homes (e.g. in cat enclosures), and preventing abandonment and accidental breeding. This will prevent the animals from causing environmental damage and reduce the predation of native animals. Reduce the impact of introduced animals by rewilding and restoring ecosystems. Thank you for your consideration of our requests.</p>

#	Submission
10	Signs warning the public of when ovals are or have been sprayed are never big enough to see or in enough places. More signs are needed on all main entrances to ovals. Please make them more visible, bigger and more of them.
11	Whilst this may not be the necessary site for my enquiry, please advise what can be done about the rat infestation around The Strand in Dee Why. It's gruesome.
12	I object to you using these pesticides as it has detrimental effect on our native wildlife as well. I am against the use of pesticides anywhere as it has a detrimental effect on the wildlife. Killing thousands in a very cruel and inhumane way. This country's first nation people have natural methods for the uses that the council use pesticides. We should be consulting with them and looking to any other natural way. The whole food chain is affected by these hideous pesticides.
13	No comment provided.
14	To whom it may concern, Chemical methods of control are outdated, dangerous and extremely harmful. This is especially so given the fact that other methods have proven successful overseas. The long term cost burden outweighs the benefits and so rather than leaving that horrendous cost to future councils, please address it now before destroying our natural resources. Thank you for your time.
15	The council states in its plan, "Council is committed to an environmental best practice approach to managing public land and the environment. ". How is this determined? For instance, there is a best practice approach to the use of toxic and lethal chemicals, such as 1080, that council does not use. I'm interested in legal liability if council doesn't use best practice, as stated, and a human or domestic animal is killed.
16	Please stop unnecessarily poisoning our beautiful Northern Beaches
17	Please do not do this as it will be an environmental disaster. The amount of native species that will be impacted will be huge.
18	I believe marker Dye should be added to all toxic substances that council or it's contractors uses to control weeds in the Northern beaches local government area. Healthy dogs eat grass and knowing what's been sprayed when out walking is good practice, courteous and a right. Many Councils in Australia use marker Dye and I agree with them.
19	This plan includes the use of Rodenticides in public parks, gardens, reserves, playgrounds, picnic areas, golf courses, bowling clubs and other sporting facilities across the Northern Beaches. A recent study was published highlighting the huge impact Rodenticides have on nocturnal birds of prey. Full report here: https://www.sciencedirect.com/science/article/pii/S0048969723049185 Considering the terrible impact Rodenticide have on native birds of prey and reptiles is it my opinion that Council should not be using Rodenticides on the Northern Beaches. The Draft Plan states that Council aims to 'ensure that pesticides are applied to public places in a safe, responsible, and humane manner, minimising harm to the community and the environment'. The use of Rodenticides seems completed inconsistent with this statement. Rodent control is necessary, however using methods that have such devastating impacts on local wildlife is not appropriate. Less harmful solutions must be employed.

Submission

Silent killers? The widespread exposure of predatory nocturnal birds to anticoagulant rodenticides



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STOP USING RAT BAITS AND HERBICIDEWS IN THESE SPACES - YOU ARE KILLING WILDLIFE!!!

At the October 2022 Council Meeting Cr. Glanville's motion for council to phase out the use of all anticoagulant rat poisons by April this year, along with reporting by May 2023 on the use of herbicides, fungicides, pesticides, insecticides, rodenticides and chemical management of vertebrate animals occurred. At the November 2022 Council Meeting it was Resolved that Council:

1. Council phase out use of Second-generation Anticoagulant Rodenticides (SGARs) on land owned or managed by Council.
2. The Chief Executive Officer report back to Council by August 2023:
 - A. progress of the phase out of SGARs by Council and relevant third parties (eg suppliers, contractors, tenants)
 - B. considerations as to usage of other chemicals on Council lands that may pose environment or human health risks

No Report and nothing else on this subject was listed for the August 2023 Council Agenda - AND NOW THIS? Disgraceful!

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Re: Pesticide Use Notification Plan Public Notice At:

<https://yoursay.northernbeaches.nsw.gov.au/pesticide-use-notification-plan> September 14 2023

STOP USING RAT BAITS AND HERBICIDEWS IN THESE SPACES - YOU ARE KILLING WILDLIFE!!! At the October 2022 Council Meeting Cr. Glanville put up a motion for council to phase out the use of all anticoagulant rat poisons by April this year, along with reporting by May 2023 on the use of herbicides, fungicides, pesticides, insecticides, rodenticides and chemical management of vertebrate animals. Ms Glanville accepted an amendment for staff to brief councillors within four weeks on the environmental and financial costs and benefits of using SGARS or alternatives and the feasibility of phasing out their use amongst Council contractors. At the November 2022 Council Meeting it was Resolved that Council:

1. Council phase out use of Second-generation Anticoagulant Rodenticides (SGARs) on land owned or managed by Council.
2. The Chief Executive Officer report back to Council by August 2023:
 - A. progress of the phase out of SGARs by Council and relevant third parties (eg suppliers, contractors, tenants)
 - B. considerations as to usage of other chemicals on Council lands that may pose environment or human health risks
 - C. available alternative methods and implications for Council.
3. Council seek opportunities to further educate the community regarding SGARs and other harmful chemicals and recommendations for safe alternatives. No Report and nothing else on this subject was listed for the August 2023 Council Agenda - AND NOW THIS? We have less and less wildlife since 2016 – the nights are silent when we once heard 4 kinds of owls and heard bandicoots, possums and other species. There are foxes everywhere, feral cats and we are also losing raptors to poisons –

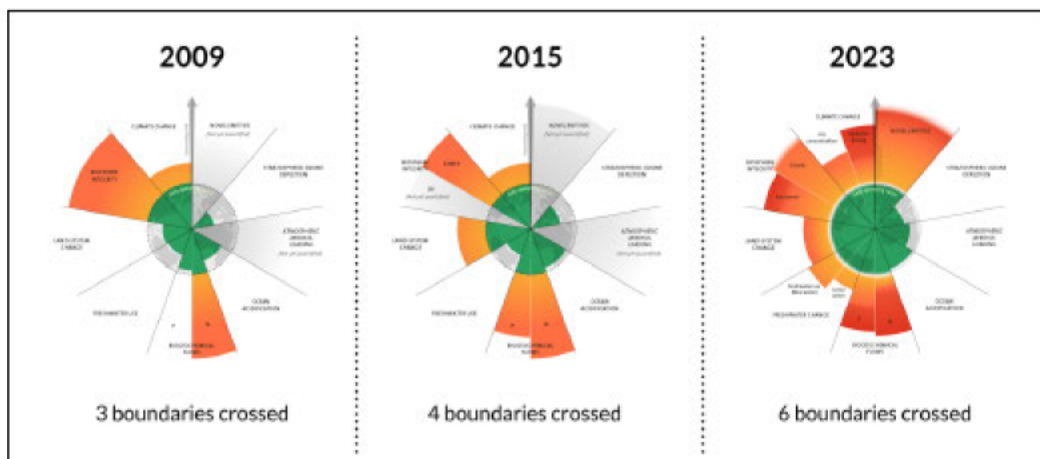
#	Submission
	2 in Avalon just last week to rat baits and secondary ingestion – a horrible way to die. When is the report to Council going to be made available – when are you going to phase out all these chemicals that are killing local wildlife? [REDACTED]
2 2	It would show compassion and save millions of animals from dying horrific deaths. Be a conscientious council and be leaders in this area by banning this pesticide. If there's a better way, we should at least try it.
2 3	<p>Re: Pesticide Notification Plan</p> <p>I am extremely concerned & disappointed to see that indiscriminate rodent baiting is being considered. Toxic rodent bait is an archaic, retrograde step that kills so many native species either directly or indirectly via predator ingestion of poisoned animals. The toxic impact on endangered species (eg. powerful owls) is unacceptable. In Avalon wildlife carers report distressing cases of ospreys, owls and other raptors killed this way. Many other species also potentially suffer (including pythons, goannas, and domestic pets).</p> <p>Alternative methods exist which do not inflict this damage to our natural heritage, eg https://goodnature.co.nz/au-en/ . I use these humane and environmentally safe traps to eradicate rats in my roof. I implore the Council to please adapt non-toxic strategies. It is an travesty that we cannot collectively do better to preserve our precious and unique local fauna and environment.</p> <p>[REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>
2 4	Leave out wild life alone. It is hard enough for them with all the buildings going up but leave there food alone please. This will also kill our dogs and cats
2 5	Please don't use Rodenticides. It is so short sighted that this is the best solution. The roll on affect is devastating for the local wildlife. The Council is big on protecting the trees because of wildlife - that is great, but this is literally another and more serious risk to their lives. Trees gone, they will just find another area to live in - THIS STUFF WILL KILL THEM. Please reconsider.
2 6	I understand the acute rodent issue. However, I am a local beekeeper and wish to register my request for not using the proposed pesticide on the NB. Please try using another process. Kind regards [REDACTED]
2 7	<p>It's concerning that this council thinks that any 'pesticide' is targeted. We live in a natural paradise for native animals and they should be protected NOT poisoned.</p> <p>Any Rodenticides will have a devastating effect on native birds of prey not to mention reptiles. You will condone the use of 1080 for large bait animals - This filth is indiscriminate, and totally barbaric taking sometimes 48 hours for animals to die convulsing - It's why is banned in many countries throughout the world. Let hope it never gets into water system after wet weather. Please do not include rodenticides or 1080 this in the plan.</p>
2 8	<p>Thank you for the opportunity to contribute to greater clarity and transparency in the management of our community lands. My comments attached. (below)</p> <p>Thank you for the opportunity to comment on the Pesticide Use Notification Plan 2023. I am reassured to read that Council is committed to an environmental best practice approach, including the use of non-chemical pest control options.</p>

#	Submission
	<p>While the notification plan seems reasonable within the scope of its intent (to allow members of the community to take action to avoid contact with pesticides) and appreciating the complexity of the program combined with size of our council area, there are aspects of notification that could be improved.</p> <ol style="list-style-type: none"> 1. While notice may be given 48 hours before pesticide use and notices remain 48 hours after use, there remain questions as to which areas are or have been treated with pesticides outside of that time limited frame. How can the community know with certainty specifically which public areas are being treated with pesticides on a regular or period basis? We suggest that a map be provided indicating specific areas and the chemicals being used so that full "informed consent" can be made by members of the community using those areas. 2. That the community be informed about the non-chemical pest control practices being used, what those practices are and an evaluation of their effectiveness. This would provide the community with optimism concerning the Council's pursuit of best practices and the reduction of chemical use on our lands. 3. That the Notification Plan 2023 table (under point 2) include a column indicating which chemicals are being used or scheduled to be used in those areas, i.e. not just type of use but also which pesticides are being or will be used. Again, this is vital for community informed consent. <p>Thank you for the opportunity to contribute to greater clarity and transparency in the management of our community lands.</p>
29	<p>Thank you for the opportunity to give feedback regarding the Pesticide Use Notification Plan. The proposed schedule and methods of communication seem adequate for public notification of the application of pesticides. However, in the interest of Informed Consent and public education, I feel that the following information should be included in the notification: the type of pesticide used, the targeted 'pest/weed', other species impacted by the pesticide, possible health risks, signs of sensitivity/reaction, safety data sheets.</p> <p>In section 3 (page 6) of the policy, the considered risks of pesticides are referenced eg; "The extent to which members of the general public, contractors and Council staff are sensitive to pesticide applications, in particular young, sick, pregnant, and elderly people." I feel it is important to inform and educate the public of these risks - to establish true informed consent.</p>
30	<p>██████████ ██████████ ██████████ ████████████████████</p> <p>22/9/23</p> <p>This Notification Plan is working on the assumption that there aren't alternatives to spraying! ██████████ this submission advocates for the following:</p> <ul style="list-style-type: none"> - The opportunity for PNB present its formal submission (a separate submission sent by ██████████) to our elected councillors for the purpose of sharing information and establishing best environmental practice nationally and globally. As a future thinking council, understanding and recognising available alternatives to pesticide spraying aligns with the Council's Biodiversity and Climate Emergency commitments. Further, a presentation will provide face to face forum where the collective aim is to plan for a sustainable world now and for future generations; - Review the 2017 Pesticide Regulations Program as determined to be six yearly (2023) as a top priority. Of concern, the Pesticide Safety Data Sheets provided in the Notification Plan omit testing or

#	Submission
	<p>provide any reference on the impact of pesticides on bees and pollinators. Pollinators provide an essential ecosystem service to both natural and agricultural ecosystems.</p> <p>Growing evidence suggests that healthy pollination services are threatened in many parts of the world. Pesticides, alone and in combination with other factors, have had a devastating effect on bees and wild pollinators. Srinivasan and Mitta et al (2015) have found that pesticides commonly found in lawn and garden products and used in agriculture are known to be hazardous to bees, some killing bees outright and others with subtle effects that reduce a bee's ability to thrive.</p> <p>Pollinators ensure reproduction, fruit set development and dispersal in the vast majority of plants. In turn, plants provide food and nesting sources for the pollinators. Some of the pollinators include bees, wasps, beetles, flies, butterflies, moths, birds, bats, and even some non-flying mammals, have suggested "multiple anthropogenic insults" in the past decades leading to significant species loss.</p> <p>Australia has over 1500 Native Bee Species. There are around 200 known species endemic to the Sydney region. Each native bee individually contributes to pollinating and maintaining indigenous biodiversity. The world's bee populations are in trouble, through colony collapse disorder, predator beetles and a broad range of factors that relate to our lack of care for the Earth. Encouraging native bees into our gardens and community helps an integral part of our ecosystem.</p> <p>"If bees were to disappear from the globe, humankind would only have four years left to live." — Albert Einstein</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
3 1	<p>Please refer to my submission to the Pesticide Notification Plan as per the uploaded file. Kind regards,</p> <p>[REDACTED]</p> <p>Attachment:</p> <p>Submission to the Councils Pesticide Use Notification Plan</p> <p>23rd September 2023</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>It appears upon reading that the council is taking due care to advise public when and where pesticides are in use but as a concerned resident and a wildflower photographer that gets up close to plants, flowers, bushes, trees and weeds that uses the public areas in the care of the Northern Beaches Council I have the following concerns.</p> <ol style="list-style-type: none"> 1. The informing process is difficult for public to become informed that an area is being sprayed beyond the 48 hours prior to and after the event. I personally will, if I knew, avoid sprayed areas

#	Submission
	<p>for much longer and even entirely! Therefore I would like to know what public areas are not sprayed at all with chemicals.</p> <p>2. Due to the now known toxicity and cancer-causing side effects of products containing glyphosate such as Bayer's Roundup, I see there is an area of the councils Pesticide Use Notification Plan that needs addressing.</p> <p>Under point 4: Notification Arrangements - detailed.</p> <p>Instances where council will not give notice of pesticide application.</p> <ul style="list-style-type: none"> • The use of small quantities of pesticides that are widely available in retail outlets and ordinarily used for domestic purposes (including home gardening). <p>There is potential here for indiscriminate and unannounced use of glyphosate containing products. Being a product widely available and for domestic use does not mean it is safe. I am sure I do not need to update the council on the effects of glyphosate on humans, insects, waterways and the environment in general.</p> <p>I ask that council ensure that glyphosate containing products are not used in their care programs and that the public are widely notified of this so the public can be more confident as they use the public land that the council has in their care.</p> <p>Thank you for your time in considering my submission</p> <p>██████████</p>
3 2	<p>I would like to see the use of 1080 as a form of pest control phased out of the Northern Beaches. It is a dangerous substance, banned in many countries. It is cruel. It is indiscriminate. It is a danger to beloved pets. It carries a risk of secondary poisoning whereby anything that feeds on the poisoned animal will also die which is threat to our wildlife. 1080 should be banned on the Northern Beaches.</p>

#	Submission
3 3	<p data-bbox="233 253 657 286">Pesticide Use Notification Plan</p> <p data-bbox="233 293 801 353">Comments from [REDACTED] 23.09.23</p> <p data-bbox="233 387 1139 539">As the guardians of this beautiful land, we have a collective responsibility to leave it in better condition than we found it. Importantly, we have the opportunity to lead on environmental issues and make decisions that serve the health of future generations. Ultimately, we need to support the ecosystems that support us because if they are in decline, then so are we.</p> <p data-bbox="233 573 1198 725">Healthy ecosystems are those which have maintained natural balances through biodiversity which is vital if we are to address the Climate Emergency in any meaningful way. Increasing biodiversity means facilitating the creation of life and acting to regenerate our public spaces. Strategies designed to kill things, be it weeds or insects, do the opposite and have degenerative effects on our fragile ecosystems.</p> <p data-bbox="233 763 1187 853">We believe it is time the Northern Beaches Council (NBC) took a leadership role regarding the Climate Emergency and understood that the global warming crisis is far boarder than a transition to new forms of energy.</p> <p data-bbox="233 891 1107 947">Below we address some key points as it relates to the application of herbicides and pesticides.</p> <p data-bbox="233 985 644 1014">NBC Climate and Environment Goals</p> <ul data-bbox="272 1021 1206 1272" style="list-style-type: none"> • NBC has clearly understood the need to protect biodiversity as outlined in <i>"Protect. Create. Live" Northern Beaches Environment and Climate Change Strategy 2040</i> https://files-preprod-d9.northernbeaches.nsw.gov.au/nbc-prod-files/documents/policies-register/environment-and-climate-change-strategy/environment-and-climate-change-strategy-and-plans/environment-climate-change-strategy-2040.pdf • The widespread and addictive use of herbicides and pesticides is in direct contravention of the council's stated goals. <p data-bbox="233 1339 855 1368">Herbicide and Pesticide Impact on Environmental Crisis</p> <p data-bbox="233 1373 1198 1462"><i>In August 2019 Council declared a Climate Emergency joining "over 900 jurisdictions worldwide, including 35 Australian councils, [to] declare that we are in a state of emergency that requires immediate action by all levels of government."</i></p>



<https://www.stockholmresilience.org/research/planetary-boundaries.html>

- Herbicides and Pesticides are classified as novel entities. This boundary, according to the Stockholm Resilience Centre, has been recently crossed.
- The application of these products is causing widespread chemical pollution and leading to rapid environmental degradation on a global scale
<https://www.stockholmresilience.org/research/research-news/2023-09-13-all-planetary-boundaries-mapped-out-for-the-first-time-six-of-nine-crossed.html>
- We cannot address the Climate Emergency without reducing chemical pollution.

Environmental Contamination for Pesticide Use

The following study shows dangers of pesticidal leaching

<https://www.sydney.edu.au/news-opinion/news/2023/07/13/global-analysis-shows-how-pesticides-leach-into-the-environment.html>

- The study showed that 730 tonnes of pesticides enter rivers each year, with about 13,000 kilometres of rivers reaching chemical concentrations above safety limits for a number of aquatic plants and invertebrates, with poorly understood consequences on rivers' ecosystems.
- Of the 0.94 Tg (teragrams) net annual pesticide input in 2015 used in this study, 82% is biologically degraded, 10% remains as residue in soil and 7.2% leaches below the root zone. Rivers receive 0.73 Gg (Gigagram) of pesticides from their drainage at a rate of 10 to more than 100 kg yr⁻¹ km⁻¹. By contrast to their fate in soil, only 1.1% of pesticides entering rivers are degraded along streams, exceeding safety levels (concentrations >1 µg l⁻¹) in more than 13,000 km of river length, with 0.71 Gg of pesticide active ingredients released to oceans every year. Herbicides represent the prevalent pesticide residue on both land (72%) and river outlets (62%).
<https://www.nature.com/articles/s41586-023-06296-x>
- The study focusses on agricultural uses but with this research and many others like it we need to ask, how many of these chemicals are making their way into our waterways and the ocean. As a surfer and avid swimmer, I often struggle with this, our oceans look clean but pesticide/herbicide residues are not visible, so we do not know how many of these toxins we are absorbing.

Biodiversity Loss and Species Extinction

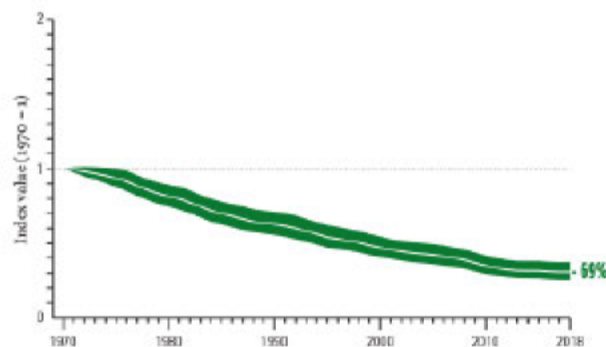
- Since the advent of the Anthropocene, humans have increased the rate of species extinction by 100–1000 times the background rates that were typical over Earth's history (Mace et al. 2005), resulting in a current global average extinction rate of >100 E/MSY.
- The Living Planet Index continue to report rapid decline of monitored populations across the globe

https://www.lpr.awsassets.panda.org/downloads/lpr_2022_full_report_1.pdf

Figure 3: The global Living Planet Index (1970 to 2018)
The average change in relative abundance of 31,821 populations, representing 5,430 species monitored across the globe, was a decline of 69%. The white line shows the index values and the shaded areas represent the statistical certainty surrounding the trend (95% statistical certainty, range 63% to 75%).
Source: WWF/ZSL (2022)¹⁰⁴.

Key

- Global Living Planet Index
- Confidence limits



- Australia has some of the highest extinction rates in the world

<https://www.pnas.org/doi/10.1073/pnas.1417301112>

Insect Extinction and Impact

Across the world, more than 40 per cent of insect species are declining and a third are endangered. The rate of extinction is eight times faster than that of mammals, birds and reptiles. The total mass of insects is falling by a precipitous 2.5 per cent a year, according to the best data available, suggesting they could vanish within a century.

<https://www.unep.org/news-and-stories/story/insect-declines-are-stark-warning-humanity>
<https://www.sciencedirect.com/science/article/abs/pii/S0006320718313636#>

Of all the insects in the world, only 1% are pests. We need our insects to keep our fragile ecosystems intact.

- *Insects indirectly benefiting humans include all insect herbivores, prey, predators, and detritivores because they are an integral part of the biotic community of ecosystems (Triplehorn & Johnson 2005). A well-functioning ecosystem provides services such as soil fertility, clean air, and clean water. Termites, cockroaches, and other soil dwelling insects, help to break down plant debris. Flies, beetles, and moths, help to decompose dead animals. Dung beetles are critical for the decomposition of animal feces. Insects are food for bats, birds, amphibians, reptiles, fish and many*

mammals. Aquatic insects such as mayflies and stoneflies are used to monitor the health of streams and lakes.

We need our insects for pollination

- Most flowering plants (75%) require an animal pollinator (Burger 1982, Gullan & Cranston 2010). There are over 200,000 species of animal pollinators and the vast majority of these are insects (Berenbaum 2007). Insect pollinators include beetles, flies, ants, moths, butterflies, bumble bees, honey bees, solitary bees, and wasps. <https://www.nature.com/scitable/knowledge/library/pests-and-pollinators-23564436/#:~:text=There%20are%20over%20200%2C000%20species,%2C%20solitary%20bees%2C%20and%20wasps.>
- The loss of floristic diversity and food resources that result from herbicide applications can reduce populations of pollinators and natural enemies of crop pests. In aquatic ecosystems, insecticides and fungicides often induce algae blooms as the chemicals reduce grazing by zooplankton and benthic herbivores. Increases in periphyton biomass typically result in the replacement of arthropods with more tolerant species such as snails, worms and tadpoles. Fungicides and systemic insecticides also reduce nutrient recycling by impairing the ability of detritivorous arthropods. Residues of herbicides can reduce the biomass of macrophytes in ponds and wetlands, indirectly affecting the protection and breeding of predatory insects in that environment. The direct impacts of pesticides in the environment are therefore either amplified or compensated by their indirect effects. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8402326/>
- More than 90% of pollen samples from bee hives in agricultural landscapes and more than 90% of stream samples are contaminated with more than one pesticide. <https://www.xerces.org/pesticides/risks-pesticides-pollinators#:~:text=However%2C%20many%20pesticides%20%2D%20including%20insecticides,incidents%20when%20pesticides%20kill%20bees.>
- Insect of all kinds are vital for healthy ecologies and all are affected by the use of pesticides. When we poison the pest, we poison the predator and issues flow up the food chain. In functioning and healthy ecosystems, predators keep pests in balance.

Mandatory Review of 2017 Pesticide Regulation

- The 2017 Pesticide Regulation is required to be reviewed every six years, which has now passed. Therefore, we should be reviewing applications of all herbicides and pesticides immediately along with implementing goals to phase them out entirely.

Summary and questions for NBC

1. We implore NBC to ask why we have certain weeds and investigate the impact of the spraying program. More often than not weeds are low succession (pioneer species) that pop in response to ecosystem disturbance. The more we spray the more disturbance is created and we exacerbate the problem. This leads to a dependence on these chemicals. Spraying keeps our public spaces in low succession states which creates opportunities for weeds otherwise known as "nature's band-aids".

2. We would like NBC to review the amount of area that is sprayed. For example, there are large areas of grass near our beaches that contain bindi-eyes. Repeated spraying suppresses the ecosystem, destroys soil biology and prevents other plants from taking their place. Therefore, we should ask: do we need such large areas of just grass or can we create patch works of shrubs and other plants to replace target weeds.
3. Concerning pesticides, we would like NBC to fully acknowledge our current extinction crisis and examine the impacts of pesticides on local fauna. Pollinators should be of utmost concern here.
4. We are highly concerned about pesticide leaching and wider environmental poisoning. We suggest that waterways and the ocean be tested for pesticides residues.
5. When using pesticides, we suggest council uses methods of least harm. For example, spot spraying and "cut and paint."
6. All application should be marked with an environmentally friendly dye so that the applications are visible to all people.
7. Signage should be placed two weeks in advance of any pesticide application. The signage should include the type of chemical being sprayed and include a number to call to the Council where staff person/s can clearly explain the pesticide use and any impacts it may have on humans, pets, and biodiversity. The signage should remain there for at least one week following the pesticide application.
8. Broad scale applications present much higher health risks that have not been examined. Non-targeted usage means chemicals can be carried by wind into sensitive areas such as schools. Drift can carry particles 30km away. These types of applications should cease immediately due to the unknown risks associated.
<https://www.dpi.nsw.gov.au/biosecurity/weeds/weed-control/herbicides/spray-drift>
9. Investigate ecological solutions to weed and pest issues. For example, planting along waterways to take up excess nutrients before they reach the ocean.
10. Trial natural methods such as steam weeding
11. Make available to the public current studies the Council is basing their current practices of pesticide use on.
12. No use of pesticides:
 - a. On playing fields, picnic areas and tidal pools
 - b. within a one kilometre radius of schools, kindergartens, and ecologically sensitive areas such as Lagoons, creeks, fish breeding grounds and ecologically endangered species of fauna or flora.
13. Finally, we would like to highlight that the 2017 Pesticide Regulation is required to be reviewed every six years, which has now passed. Therefore we should be reviewing applications of all herbicides and pesticides immediately along with implementing goals to phase them out entirely.

Furthermore and in closing, [REDACTED] would like to:

1. Offer this submission as a presentation to our elected councillors. Our council representative is [REDACTED]
2. Suggest that this submission be added to the October 24 Northern Beaches Council meeting agenda to which [REDACTED] will follow up.

Submission

We thank you for listening and we look forward to working with you as we strive to create a healthier environment and brighter future for all people.

Kind Regards,



Response from Council:

Dear [REDACTED]

Thank you for your email and considered submission. We are treating it as a late submission on the Plan and will be reviewed with all other submissions. For your information all submission are included verbatim in a community engagement report that gets tabled at the Council meeting so the Councillors will see it and it will be published.

Council is obligated by legislation to have a Plan to outline to the community how we communicate the use of any pesticides, the use of pesticides, which pesticides are used and where they are used is not within the scope of this Plan.

Please feel free to call me on [REDACTED] or my colleague [REDACTED] if you would like to discuss further.

[REDACTED]

[REDACTED]

Acting Executive Manager Parks & Recreation

Parks & Recreation

Received via Email

1

1080, the Killer Poison: 🐾

1080 is toxic to all living species, including microbes, plants, insects, birds, and humans. In mammals, it causes birth defects, reduced fertility, and damage to the reproductive system, brain, heart, and other organs. Anecdotal evidence indicates that its use may be linked to an increased risk of developing cancer.

Northern Beaches Council uses Sodium fluoroacetate, commonly called 1080, which is a barbaric poison used extensively to kill so-called "pest" species, such as foxes, rabbits and wild dogs. It is colourless, odourless, and tasteless and is therefore easily ingested by companion animals as well as native species. Its victims – intended or otherwise – experience a slow, agonising death.

Using chemicals that leave dogs 🐕 🐶 🐩 and other native animals, Wallabies, possums, native birds and Reptiles to die slowly in agony is not an acceptable practice.

Australia has the highest extinction rate of species in the world 🌍 Dingoes and all our native animals are vital to the health of our ecosystems, suppressing invasive species populations such as foxes, 🦊 wild cats 🐈 rabbits and native herbivore species such as kangaroos and wallabies. 🦘 This improves the health of vegetation and bushland and all of the animals that depend on it. Dingoes hold a unique place in many First Nation Cultures and should be accepted.


Here are facts you need to know to keep your animal companions safe and to speak up for the native animals who are being poisoned.

SYMPTOMS OF 1080 POISONING?

#	Submission
	<p>In dogs, the signs of poisoning are usually noticeable within half an hour of ingestion but can take more than six hours to show. Symptoms include vomiting, anxiety, disorientation, and shaking. These quickly develop into frenzied behaviour with running and screaming fits, drooling, uncontrolled paddling, and seizures, followed by total collapse and death. This agony may go on for up to 48 hours.</p> <p>I TRIED TO SEND THIS SUBMISSION YESTERDAY BUT YOUR SITE WAS DOWN.</p> <p>PLEASE ADD TO SUBMISSIONS.</p>
2	<p>Dear Councillors</p> <p>I am taking this opportunity (re the Pesticide Use Notification Plan) to raise again my concerns for the use of 1080 by our council.</p> <p>It is requested that our council places an immediate ban on 1080 and other strychnine poisons.</p> <p>From the "Pesticide Use Notification Plan 2023" it is understood our council:</p> <ul style="list-style-type: none"> • aims for pesticides to be "applied to public places in a safe, responsible, and humane manner", <p>however there is no antidote for 1080, it is not considered humane, and that "Large pest animal baiting" is planned for many areas, where families, children and dogs and other pets may visit and may be at risk:</p> <ul style="list-style-type: none"> - bushland reserves, sea headlands, beach dunes, creek & wetland reserves and waterways - road verges & reserves, laneway easements - cemeteries which are often used by locals for walking, walking dogs, and children riding bikes - vacant crown land <ul style="list-style-type: none"> • uses herbicides and then other "pesticides used may also include fungicides, algacides, insecticides, rodenticides, bird baits and large vertebrate baits" <p>where the latter likely means (but does not explicitly explain) 1080 and/or strychnine i.e. most severe poisons,</p> <ul style="list-style-type: none"> • is open to new techniques to be "investigated when they become available or when situations require innovative solutions", <p>and therefore I recommend our council investigates alternatives ASAP while halting all 1080 baiting, just as Campbelltown Council has already put in place.</p> <p>RELEVANT INFORMATION</p> <ol style="list-style-type: none"> 1. 1080 IS NOT HUMANE as has been raised by RSPCA Australia for many years, animals suffer horrifically with convulsions, manic behaviour, vomiting, crying out in pain, and muscle spasms, without any antidote. 2. 1080 IS AN INDISCRIMATE killer which may be ingested by our native wildlife, farm and domestic animals etc. 3. 1080 CAN ENTER THE ECOSYSTEM through water ways or via the food chain. 4. CAMPBELLTOWN COUNCIL HAS BANNED 1080 <p>Campbelltown council has officially banned use of 1080 poison & strychnine - native animals as well as pets, and the targeted introduced species die from a horrendous painful death. Cr Stellino said '1080 or sodium fluoracetate, "kills indiscriminately: not only targeted dingoes and introduced animals, but native wildlife and beloved companion animals too"' southwestvoice. com. au</p> <p>https://kb.rspca.org.au/knowledge-base/what-is-the-rspcas-view-on-using-1080-for-pest-animal-control/</p> <p>https://www.ban1080.org.au/</p> <p>https://www.animaljusticeparty.org/1080</p>

#	Submission
	<p>kind regards, [REDACTED]</p> <p>[REDACTED]</p>
3	<p>Northern Beaches Council</p> <p>I would like to note my objection to the continued use of 1080 (Sodium fluoroacetate) Poison Baits.</p> <p>We are one of only a handful of countries who continue to use 1080 Poison Baits to try and control so called pest species.</p> <p>1080 baits kill all animals that digest it, both Native & introduced and it remains in our ecosystem to harm every living species that comes in contact with it.</p> <p>This method of controlling animals (numbers) is cruel & barbaric.</p> <p>Once digested the animal dies an agonising slow death.</p> <p>Council must look at/too other way to control pest numbers. For example trapping and Euthanasing in a humane way so these animals do not die an agonising slow death.</p> <p>Regards,</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
4	<p>To The Council</p> <p>Authorities continue to poison our planet and all the wonderful wild and domesticated animals that rely for survival on plants and on those that feed on plants.</p> <p>I will never understand why people who have the power to stop this wholesale eradication of animals, from the tiniest insect to the apex predators, in the most horrendously cruel way, just don't seem to give a damn about the environment. You choose ways to kill which will cause the most extreme and prolonged suffering. Then others, for instance our precious owls, come along and eat the poisoned smaller animals. Then they too die a painful and lingering death. This is what you choose to inflict on vulnerable, living beings. It is quite incredible.</p> <p>My family and I plead with you to do a dramatic turnaround in policy and choose alternative substances that are safe, non-lethal to animals and non-polluting of our dying earth. They are available and are being used by other councils.</p> <p>Please be the solution, to revive and invigorate the soil, the water, the parks and the bushland which councils have set themselves up to protect.</p> <p>Give our fast-disappearing wildlife a chance to thrive.</p> <p>[REDACTED]</p>

#	Submission
	<div></div> <div></div>
5	<p>Attention: Council staff and elected Councillors of Northern Beaches</p> <p>Thank you for the opportunity to comment. I have excellent computer security, so the links below are all safe to open.</p> <p>I have read the Pesticide Notification Plan and am horrified to see that fungicides, herbicides, baits, bactericides, repellents, and rodenticides will be used in many areas of the Northern Beaches Council area.</p> <p>My family is really worried about the use of deadly sprays used in all sorts of settings where both humans and pets roam. This is very dangerous, especially for the animals, plants they eat and so on. Many non-target native animals will also be poisoned and suffer.</p> <p>Australia is one of the few countries that still uses 1080. Most countries have banned its use on the grounds of its inhumanity and danger to animals and people alike. It will ruin entire ecosystems because it is so toxic.</p> <p>We oppose vehemently the use of 1080 poison baiting for foxes and other animals. We have seen animals die from 1080 poison and is a terrible death that causes them to suffer most ghastly deaths in agony for many days. No animal deserves this, especially when there are more humane ways of dealing with the problem of unwanted animals.</p> <p>Even animals who partially ingest 1080 can take several days to die in agony. Please do not use 1080. It is not a long term solution and there other ways to control animals by applying humane methods that work over time. Poisoning with 1080 is unacceptable in this day and age.</p> <p>Humane methods are:</p> <p>Fertility controls</p> <p>Gonacon - https://assets.nationbuilder.com/ajpnsw/pages/2028/attachments/original/1669614472/Alternatives_to_1080_Poison.pdf?1669614472</p> <p>and ContraPest - One of the methods proposed to tackle the rat problem in Paris. https://www.smh.com.au/world/europe/if-you-can-t-beat-them-cohabitate-paris-s-plan-for-rats-and-residents-20230610-p5dfju.html</p> <p>A fertility control drug is already used in the United States.</p> <p>Olfactory deception, e.g. https://theconversation.com/scientists-used-fake-news-to-stop-predators-killing-endangered-birds-and-the-result-was-remarkable-152320</p> <ul style="list-style-type: none"> • Essential reading: <p>The link below concerns 1080 and relates to an article entitled 'Killing Schrodinger's Feral Cat', by Dr Clive Marks Animal Studies Journal (2013) (Vol 2 Iss2/4, 51-66). It deals with laboratory experiments on cats to determine the effects of 1080, and it should be compulsory reading for those who are responsible for inflicting this inhumane toxin on sentient animals. See link: http://ro.uow.edu.au/cgi/viewcontent.cgi?article=1071&context=asj</p> <p>The cruelty inflicted by 1080 in the above experiment applies to all animals or humans who consume 1080,</p> <p>Humane methods should be used to achieve the Northern Beaches Council objectives, which are more acceptable to the community. Examples are:</p> <ul style="list-style-type: none"> • Non-toxic sprays, • Motion-activated sprinklers • Ultrasonic animal repellents

#	Submission
	<ul style="list-style-type: none"> • Habitat manipulation – increasing the complexity of habitat for prey to hide, reducing burns, leaving unburnt areas, reducing grazing pressure to increase grass, ground cover and vegetation • Maremma dogs to protect native species (as with penguins, Warrnambool) • Fertility control – immunocontraceptive vaccine (urgent research needed) • Genetic manipulation <p>Below is a media release from the RSPCA about the cruelty of 1080 that is still valid today:</p> <p>RSPCA Media Release Media release date 15/11/2007</p> <p>Subject 1080 IS NOT A HUMANE POISON: INTERNATIONAL JOURNAL PUBLISHES RSPCA PAPER</p> <p>A new report into the use of sodium fluoroacetate (or 1080) in Australia has found it is an inhumane poison, and has called for urgent research into improving the humaneness of vertebrate pest control methods in this country. The report, written by RSPCA Australia's Dr Miranda Sherley, has been published in the current edition of the highly respected Animal Welfare journal from the UK-based Universities Federation for Animal Welfare. Dr Sherley said despite its widespread use, the animal welfare implications of 1080 baiting have received little attention.</p> <p>There has been ongoing research into the ecological impacts of using 1080 as well as a high level of public concern regarding the effects of the poison on non-target animals, including pets or working dogs that might accidentally pick up the baits, as well as native wildlife said Dr Sherley. However, we were concerned to further investigate what level of pain and suffering was caused by 1080 on any vertebrate animal, including the target animals which, we should remember, are also very much able to experience pain and suffering and deserve no less compassion in the way we deal with them, she said. Dr Sherley said a range of criteria including studying how the poison works, speed of death, behaviour of affected animals and long-term effects on survivors - were used to scientifically assess how humane the use of 1080 is as a method of pest control.</p> <p>Human cases of 1080 poisoning are also helpful in understanding the effects on other animals: while conscious, people report feeling pain and distress, and through detailed hospital records we are also able to better track their recovery and any longer term effects, she said. Based on the evidence available, our conclusion is that animals affected by 1080 do not die a quick and humane death; rather, they suffer a range of potentially painful and distressing symptoms, often over a period of hours, said Dr Sherley.</p> <p>We can no longer kid ourselves that 1080 is an acceptable option; we urgently need to focus efforts on finding ways to make 1080 more humane, or otherwise finding more humane ways to control pest animals. Sodium fluoroacetate (1080) is widely used for the control of a range of vertebrate pests in Australia, including foxes, rabbits, dingoes, wallabies, possums, wild dogs and pigs. A wide range of other animals are also susceptible to 1080 poisoning, including marsupials, birds, reptiles and amphibians. 1080 works by blocking the body's energy supply, causing cells to die and the blood to become more acid. There is no available antidote.</p> <p>RSPCA Australia is opposed to the use of poisons that cause suffering and/or baiting strategies that are non target-specific. RSPCA Australia believes the available evidence indicates that, in general, the effect of 1080 on animals is not humane.</p> <p>Please read all the above references and you will understand that it is unethical to use 1080. Show mercy to all creatures great and small.</p> <p>I am happy for my submission to be made public.</p> <p>Yours sincerely,</p> <p></p>
6	<p>Thank you for the opportunity to provide feedback on your Pesticide Plan in the Northern Beaches. However, I am concerned about the safety of the chemicals being used in our public spaces. Pesticides are now a major polluter of air, land and water. They pose serious health risks for the community and have a detrimental effect on biodiversity.</p>

#	Submission
	<p>Even if all cautions are taken to minimise risks, there is always the possibility of water contamination or air pollution due to volatile pesticides, or accidental spills. Pesticide residues can inadvertently harm beneficial plants and animals and contaminate groundwater. The long term effects of these chemicals on our health are unknown. We need to consider non-chemical alternatives that are safe for the community and the environment.</p> <p>I would like to see Council adopt a more environmentally responsible approach to land management. Some pro-active councils in Europe have proven that switching to non chemical weed control can be economically viable.</p> <p>https://www.pan-uk.org/site/wp-content/uploads/Alternatives-to-herbicides-a-guide-for-the-amenity-sector.pdf</p> <p>The public also need to become more educated on the benefits of weeds for attracting bees, birds and other pollinators.</p> <p>I hope that Council will urgently consider non- chemical alternatives too so that we can create a cleaner, safer world.</p> <p>Sincerely,</p> <p>██████████</p>
7	<p>To whom it may concern,</p> <p>I strongly oppose the use of 1080 in the Northern Beaches area or any area.</p> <p>It is highly toxic to the environment and effects so many forms of wildlife in an excruciatingly painful way.</p> <p>I have had to remove quite a few dead bandicoots from my area and I looked up how they may have died as it was Not normal. 1080 was the culprit. Bandicoots are an important part of our ecosystem as are other effected wildlife and it so Sad they have to die this way.</p> <p>The intended victim of 1080, the fox, is still alive and well in this area so clearly it is not working and the cost /benefit far outweighs The usefulness of this highly toxic pesticide.</p> <p>Time for the Northern Beaches Council to look like a leading and pioneering advocate for the protection of our wildlife and the environment And do the research on alternative non toxic forms if this has to be.</p> <p>Regards,</p> <p>██████████</p>
8	<p>NOTE: This submission included several large attachments, which are available on request. Attention: Council staff and elected Councillors of Northern Beaches Council.</p> <p>Thank you for the opportunity to lodge my submission to the Northern Beaches Council – ‘Pesticide Use Notification Plan’.</p> <p>We thank the NBC for reviewing its use of hazardous chemicals, and whilst all are of concern to us, and to an increasingly concerned community, today we would like to focus on 1080 poison.</p>

#	Submission
	<p>"Council recognises the inherent risk of using 1080 baits and is interested in any safe, viable and effective alternatives." – Jess Hagan to ex-Councillor, Rory Amon, 16.03.23</p> <p>- We are very heartened by the Council's position on this.</p> <p>Our submission, herewith, also includes attachments listed below, and puts the case for replacing 1080 poison with humane, non-lethal, and effective alternatives.</p> <p>Please find attached:</p> <ol style="list-style-type: none"> 1 Cover page 2 Contents 3 Further alternatives 4 My letter first published in the Manly Daily, then the WIRES newsletter (2001) – 1 of 2 5 As above – 2 of 2 <p>We would also like it noted that the Northern Beaches Council Draft 'Pesticide Use Notification Plan 2023' list does not name the various pesticides and baits it plans to use: https://yoursay.northernbeaches.nsw.gov.au/download_file/8208/2901. When will the council be doing this?</p> <p>We wish the Council well in arriving at a plan that replaces the repeated use of cruel and environmentally harmful chemicals with effective, environmentally responsible, and compassionate methods (already in use globally, and to meet current community expectations) in order to better manage one of the most beautiful environments in the world.</p> <p>Yours faithfully,</p> <p>[Redacted Signature]</p>
9	<p>Attention Northern Beaches Council.</p> <p>1080 should be banned immediately. It is a chemical that is extremely dangerous to plants animals and humans. It kills and maims. This is why the majority of the countries in the world have banned its use including America.</p> <p>Why would a local Council even contemplate using it. Is it cheap? There are alternatives please use them.</p> <p>Kind regards</p> <p>[Redacted Signature]</p>

#	Submission
10	<p>Please find my comments attached to amend the Pesticide Use Notification Plan - not just rubber stamp it.</p> <p>██████ ██████████</p> <h3>Pesticide Notification Plan - comment</h3> <h4>Northern Beaches Council to lead with best practice weeding and pest control techniques</h4> <p>As the forwarding-thinking, award-winning council we would like Northern Beaches Council - NBC to be; it would be good to not just 'rubber-stamp' the Pesticide Spraying Notification Plan; but to amend it.</p> <p>The chemicals that NBC has indicated are currently used, though not Glyphosate, may be as toxic ₁; or may be swapped for a toxic chemical at any stage. To protect council staff, contractor's staff, residents, children and local native flora and fauna including aquatic life and soil life; particularly endangered species; some questions and strategies could be added to the protocol. These would be questions such as:</p> <p>'Is this a rodent baiting situation? – it's a hazard for birds and lizards - please refer to the RSPCA https://kb.rspca.org.au/knowledge-base/what-is-the-most-humane-way-to-kill-pest-rats-and-mice/ and https://www.wires.org.au/wildlife-information/wildlife-and-pesticides</p> <p>'Is this a fox baiting situation or other vertebrate pest species? - please refer to the RSPCA - https://kb.rspca.org.au/knowledge-base/how-can-you-measure-the-humaneness-of-a-pest-animal-control-method/https://pestsmart.org.au/pest-animals/</p> <p>'Is this an algae problem? – apparently barley straw or barley straw extract works₂. This isn't a toxic chemical, so wouldn't require notification.</p> <p>'The drain is just for rain' - 'Is spraying the best strategy for this location?' – Some councils use the slogan 'The drain is just for rain' – how close is the spraying to any hard surfaces or gutters? Would hand-weeding be safer? Or saturated steam weeding which leaves only water and 'cooked' weeds.</p> <p>'How far away from a waterway should I be spraying? Have I read the chemical label regarding distance from waterways?'</p> <p>'How close is this to the NSW Government main roads spraying – every two months, that already places a toxic load on the habitat there and in the waterways that drain from main roads?'</p> <p>'Is the weed I am spraying showing signs of resistance?' ie spraying is not going to work. The recommendation is to use other modes of action and non-chemical methods of control.</p>



Are weeds resistant to herbicide spraying?

'Allowing for wind drift how safe it for me to spray near play equipment or pre-schools or any other places on the 'sensitive' list, when steam weeding, or hand weeding would be safe?'
Notification of a safe method would not be required.

Wildlife can't read – Am I going to spray near an animal habitat? Many of the chemicals are 'highly toxic to aquatic invertebrates, moderately toxic to birds and aquatic plants'.



Crested pigeons can't read

If spraying: Please think about notices in more than one location at dog parks. Please consider a patchwork of spraying at different dog parks, so all are not affected for 3 weeks.

'Do I need to clean, weed and de-spider?' Playgrounds and picnic tables can have weed control, cleaning and de-spidering done in the one action with a locally invented saturated steam and boiling water process⁴, which is safe for immediate use.

'Is spraying really safe for children?' Is it safe for herbicides/insecticides to be sprayed on sportsgrounds where young children will be making contact with the ground? If the herbicide or insecticide has dried on weeds it is still there to rub off on them.

Waterways and washdown 'Will I be weeding in an area close to waterways and/or so infested with weeds that the vehicle may collect seed material? – Use saturated steam and boiling water to kill the weeds and wash down the vehicle before transferring seeds and fragments to another zone.

Personal Protective Equipment – PPE isn't stated for 'other people' it is for your own safety and your health for a long life. If the instructions are to wear coveralls, gloves, a washable hat, eye and breathing protection; then you should. Council needs to know that all staff and contracted staff are following safety instructions. If it's unpleasant then consider an alternate strategy to the use of chemicals.

Footnotes

1 – Pesticides Properties Database – PPDB, United Kingdom

<http://sitem.herts.ac.uk/aeru/ppdb/en/index.htm> - chemicals listed by Northern Beaches Council are summarized in the Appendix with their reference url.

2 – aquatictechnologies.com.au

3 - <https://www.wires.org.au/wildlife-information/wildlife-and-pesticides>

4 – 'Satusteam' by 'Weedtechnics' invented by Northern Beaches local. Kill weeds and sanitises, cleans and de-spiders play equipment and picnic tables. <https://www.weedtechnics.com/>

Appendix

Pesticides Properties Database – PPDB, United Kingdom

<http://sitem.herts.ac.uk/aeru/ppdb/en/index.htm> - chemicals listed by Northern Beaches Council are summarized here with their reference url:

Acelepryn

Insecticide – chlorantraniliprole and propane-1,2-diol

Chlorantraniliprole (Ref: DPX E2Y45)

Last updated: 19/08/2023

Summary

Chlorantraniliprole is a broad-spectrum insecticide. It has a low aqueous solubility and a low volatility. It tends to be highly persistent in the environment. It is highly toxic to aquatic invertebrates, moderately toxic to birds and aquatic plants, and has a low toxicity to bees and earthworms. Chlorantraniliprole has a low oral mammalian toxicity.

More info – eg 3 European countries don't permit it's use

<http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1138.htm>

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate

Ecotoxicity

Human health

		
Red	Red	Amber

UK PPDB details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1138.htm>

Barricade

ACTIVE CONSTITUENT: 480 g/L PRODIAMINE



Prodiamine (Ref: SAN 745H)

(Also known as: BRN 2181386; USB 3153)

Summary

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Red	Amber

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/1202.htm>

Crest Herbicide

ACTIVE CONSTITUENTS:

2.5 g/L FLORASULAM

100 g/L FLUROXYPYR present as the METHYLHEPTYL ESTER




Florasulam (Ref: DE 570)

Summary

Florasulam is a post-emergence herbicide. It is highly soluble in water, volatile and there is a possibility, under certain conditions of it leaching to groundwater. It is not persistent in soil but may be persistent in aquatic systems. It has a low mammalian toxicity and is not thought to bioaccumulate. Whilst a recognised irritant no other serious human health issues have been reported. It is moderate to highly toxic to birds, most aquatic organisms and honeybees. It has a low toxicity to earthworms.

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Amber	Green

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/322.htm>

Fluroxypyr (Ref: DOW 43304-H)




Last updated: 25/07/2023

(Also known as: fluroxypyr acid)

Summary

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Amber	Red

<http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/347.htm>

Stadium Turf Selective Herbicide

Agricultural herbicide

Clopyralid (as the potassium salt) + Diflufenican + MCPA (as the potassium salt) + Other (secret) non hazardous ingredients

Clopyralid

Last updated: 20/08/2023

(Also known as: clopyralid-olamine; Dowco 290; clopyralid acid; 3,6-dichloropicolinic acid; DCP)




Summary

A post-emergence herbicide for control of broad-leaved weeds. It has a high aqueous solubility, is volatile and, based on its chemical properties, there is a high risk of it leaching to groundwater. It can be persistent in both soil and water systems depending upon conditions. It has a low mammalian toxicity and is not expected to bioaccumulate. It is an irritant. It is moderately toxic to

birds, fish, aquatic invertebrates, honeybees and earthworms. It has a low toxicity to aquatic plants and algae.

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Amber	Amber

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/169.htm>

Diflufenican (Ref: AE 088657)

Last updated: 18/08/2023

(Also known as: diflufenicanil; DFF)

Summary

Diflufenican is a grasses and broad-leaved weed herbicide. It has a low aqueous solubility and a low volatility. It may be moderately persistent in soil systems depending on local conditions. It can also be very persistent in aquatic systems depending on local conditions. Based on its physico-chemical properties it is not expected to leach to groundwater. It demonstrates a high toxicity to algae, a moderate toxicity to other aquatic organisms, birds and earthworms. It has a low toxicity to honeybees. Diflufenican also has a low toxicity to mammals if ingested and is thought to be an eye irritant.

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Red	Amber

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/235.htm>

MCPA (Ref: BAS 009H)




Last updated: 28/07/2023

(Also known as: metaxon; BAS 101H; BAS 141H; MCP; 2,4-MCPA; 2M-4C; MCPA acid)

Summary

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Amber	Amber

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/427.htm>

ProForce Duke

Herbicide - For the post-emergent control of certain broadleaf weeds and grasses in turf and for the suppression of Winter grass and Bahia grass

ACTIVE CONSTITUENT: 100 g/kg IODOSULFURON-METHYL-SODIUM

Iodosulfuron-methyl-sodium (Ref: AE F115008)

Last updated: 28/07/2023

(Not known by any other names)

Summary

Iodosulfuron-methyl-sodium is a sulfonylurea herbicide. It is highly soluble in aqueous solution and semi-volatile. It is not persistent in soil but may be in aquatic systems. It is highly toxic to mammals, a neurotoxin and a skin, eye and respiratory tract irritant. It is moderately toxic to birds, most aquatic organisms, honeybees and earthworms.

Data alerts

The following alerts are based on the data in the tables below. An absence of an alert does not imply the substance has no implications for human health, biodiversity or the environment but just that we do not have the data to form a judgement.

Environmental fate	Ecotoxicity	Human health
		
Red	Amber	Red

Details - <http://sitem.herts.ac.uk/aeru/ppdb/en/Reports/401.htm>

Notes from product information – just a sample

Stadium Turf SDS

Statement of Hazardous Nature This product is classified as: Xn, Harmful. Xi, Irritating. N, Dangerous to the environment. Hazardous according to the criteria of SWA.

Proforce Duke SDS/label

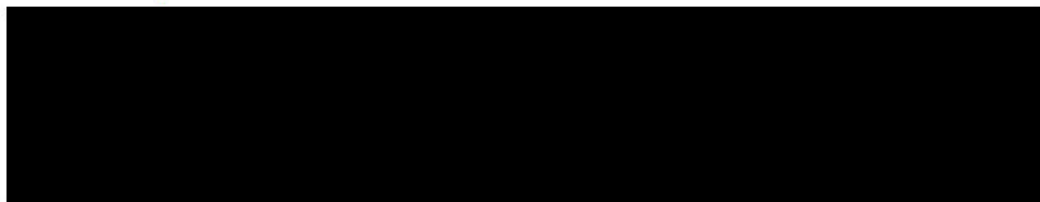
RESISTANT WEEDS WARNING ProForce DUKE 100 WG Herbicide is a member of the sulfonylurea group of herbicides and has the inhibitor of ALS mode of action. For weed resistance management DUKE 100 WG is a Group B herbicide. Some naturally-occurring weed biotypes resistant to DUKE 100 WG, and other Group B herbicides, may exist through normal genetic variability in any weed population. These resistant individuals can eventually dominate the weed population if these herbicides are used repeatedly. These resistant weeds will not be controlled by DUKE 100 WG or other Group B herbicides. DO NOT rely exclusively on DUKE 100 WG for weed control. Use as part of an integrated weed management program involving herbicides with other modes of action and non-chemical methods of control. Croplife Australia resistance management strategies are available from your local agricultural chemical supplier. Refer to these strategies for details of how to manage the build-up of resistant weeds in your turf. Since occurrence of resistant weeds is difficult to detect prior to use, Indigo Specialty Products Pty Ltd accepts no liability for any losses that may result from the failure of DUKE 100 WG to control resistant weeds.

PRECAUTION Mowing Avoid mowing during the 3 to 4 days preceding or following treatment. Re-entry period: DO NOT allow entry into treated areas until the spray has dried. **PROTECTION OF CROPS, NATIVE AND OTHER NON-TARGET PLANTS** Very toxic to aquatic plants and certain algae. DO NOT apply under weather conditions, or from spraying equipment, that may cause spray to drift onto nearby susceptible plants/crops, cropping lands or pastures. DO NOT replant any crop or ornamental to treated areas other than the turf grass listed in the directions for use for a period of 12 months after application. APVMA Approval No.: 88829/126513 **PROTECTION OF LIVESTOCK** DO NOT graze treated turf or feed turf clippings from any treated area to poultry or livestock. **PROTECTION OF WILDLIFE, FISH, CRUSTACEANS AND ENVIRONMENT** Keep people and pets off treated areas until spray deposits have dried. DO NOT contaminate streams, rivers or waterways with the chemical or used containers. DO NOT apply if heavy rain is forecast.

Submitted by



Relevant background



1
1

Hello,
Was reading in your council email re the pesticide plan.
Are you still banning glyphosphate?

What are you doing for the Ross river virus at Narrabeen lake?

Also, I don't feel like there is any visible signage when council sprays at Palm beach.

#	Submission
	<p>Kind Regards, [REDACTED]</p> <p>Response from Council: Dear [REDACTED]</p> <p>With regard to your question below regarding the ross river virus at Narrabeen Lake, I can confirm the following.</p> <p>Council, in partnership with the NSW Health Surveillance and Risk Unit, participates in the Arbovirus Surveillance and Mosquito Monitoring program yearly. As part of the program, Council undertakes weekly monitoring of viruses in mosquitos in numerous locations in the Northern Beaches LGA, including Narrabeen Lake. In the current monitoring period between October 2022 to April 2023, there have been zero detections of Ross River Virus in the LGA. Council intends to recommence the program during the warmer months when mosquito activity is more prevalent.</p> <p>Kind regards, [REDACTED] [REDACTED] [REDACTED]</p>

Document administration	
Version	1.0
Date	30 November 2023
Approval	Executive Manager, Parks and Recreation
Status	Final
Related Projects	
Notes	Community and stakeholder views contained in this report do not necessarily reflect the views of the Northern Beaches Council or indicate a commitment to a particular course of action.