Attachment C

Draft Weed Management Policy

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Purpose

This policy details how the City of Sydney (the City) manages Weeds through an Integrated Weed Management approach to achieve and maintain safe, high-quality Public Places, to meet our statutory obligations and to minimise the use of Pesticides.

Scope

This policy applies to:

- land under the ownership of the City
- land under the care, control or management of the City
- land licensed under the City's Community Gardens Guidelines

This policy does not apply to:

- land the City owns and has leased to a third party

Definitions

Term	Meaning
Contracted Service Provider	A third party contracted to provide services on behalf or with the City, being an organisation, including for profit and not-for-profit organisations, private companies, and government entities. It excludes any contracted service provider engaged by an entity external to the City such as utility subcontractors.
Employee	All City of Sydney employees including permanent (whether full-time or part-time), temporary, casual employees and apprentices.
Herbicide	Any substance or mixture of substances intended for preventing, destroying or controlling any unwanted plant, including algae or aquatic weeds. Herbicide is a type of Pesticide.
Integrated Weed Management	The coordinated use of a variety of design approaches and manual methods and techniques in combination with Herbicide use, with the aim of reducing reliance on Herbicides alone, and increasing the chances of successful Weed control or eradication.
Pesticide	Any substance, or mixture of substances, other than a feed additive, intended for preventing, destroying or controlling any pest.
Public Place	Places that are accessible to and intended for use by the public that the City owns or manages, such as parks and open space, squares, streets, footpaths, leisure and community centres and interiors of some council buildings.

Term	Meaning
Service Levels	Defined outcomes to achieve the presentation and condition of a Public Place relating to the presence of weeds. Service Levels vary depending upon the type and use of a Public Place. However, all Service Levels encourage Integrated Weed Management and specify work health and safety and statutory requirements that must be met whilst planning and undertaking any services in Public Places.
Volunteer	A person who gives their time to the City, without financial remuneration and for the benefit of the community at the direction of the City's Employees.
Weed	A plant that has an adverse effect on, or is suspected of having an adverse effect on, the environment, the economy or the community because it has the potential to: • out-compete other organisms for resources including food, water, nutrients, habitat and sunlight • transmit disease to other plants • cause harm to other organisms through its toxicity • damage infrastructure • reduce the amenity or aesthetic value of a Public Place • harm or reduce biodiversity
Worker	All Employees, agency contractors (labour hire), work experience students and Contract Service Providers. Excludes Volunteers.

Policy Context

The City of Sydney covers an area of approximately 26 square kilometres. The land use within the Local Government Area (LGA) is diverse, and includes the Central Business District, urban renewal residential areas, industrial, warehousing and commercial development, heritage buildings and infrastructure, roads, squares, parks and open spaces, sports fields and recreation amenities and bush restoration areas.

Weeds pose a substantial threat to the use, enjoyment, function, integrity and maintenance of these areas by:

- damaging the function and structure of our land-based and aquatic natural and restored ecosystems, through habitat destruction and outcompeting endemic flora and fauna for nutrients. The City's bush restoration areas, wetlands, endangered Temperate Coastal Saltmarsh communities and mangroves are all threatened by Weeds
- affecting the human and animal health of our communities by causing allergies, injuries, dermatitis and respiratory issues
- having the potential to impact the function of our roads, footpaths and public squares and undermining the integrity of cliff faces and built infrastructure
- affecting the visual amenity and enjoyment of our parks and the condition and use of our sports fields and recreation areas.

The economic impact of Weeds in New South Wales (NSW) is conservatively estimated at over a billion dollars per annum by the NSW Department of Primary Industries and Regional

Development. Given this, the City has a responsibility, not only to the communities and lands within our LGA, but to the Greater Sydney Region to proactively manage our biosecurity risks.

In response to these impacts and the threat Weeds pose, the City:

- has a responsibility to the community to provide safe, functional, welcoming, well maintained and aesthetically pleasing Public Places
- has a statutory obligation under the Biosecurity Act 2015 (NSW) to prevent, eliminate, minimise and manage biosecurity risks posed by Weeds and to develop, implement and co-ordinate Weed control programs
- is committed to ensuring that Herbicide use is safe, responsible, justified and minimised in our efforts to prevent, control and eradicate Weeds.

Policy Statement

The objectives of the Weed Management Policy are to:

- contribute to the biosecurity of the Greater Sydney Region
- demonstrate the City's commitment to minimising the use of Herbicides and prioritising the use of Herbicide alternatives where safe, feasible and effective
- provide safe, high-quality and welcoming Public Places
- protect the natural environment and Public Places

The City manages Weeds in accordance with the below statements.

Weed Management Approach

Integrated Weed Management (IWM)

The City's weed management approach is an integrated one, emphasising the use of Herbicide alternatives to prevent, control and eradicate Weeds to the extent possible, without the use of Herbicides. Herbicides are only used where other techniques or methods are partially or fully ineffective.

IWM requires planning, knowledge of a Weed's biology and ecology, and appropriate control methods for the situation, Public Place and the community's interaction with the area.

IWM involves a range of methods and approaches. Workers will in the first instance assess the Weed, Public Place, situation and risks to determine which individual or combination of IWM methods is required to prevent, control or eradicate the specific Weed.

IWM approaches are grouped within the following sequence:

<u>Proactive Treatment – Weed prevention</u>

- designing Public Places with consideration for Weed management, such as hard edge treatments between turf and garden beds
- growing healthy turf and plants to achieve full ground cover
- maintaining dense plant populations in garden beds to restrict solar access and nutrients to Weeds
- building and nurturing resilient soil with diverse microbiome and complex structure to support healthy turf and plants, and reduce the need for fertilisers
- applying mulch

- installing porous pavement street tree surrounds where possible
- street sweeping and high pressure cleaning footpaths, gutters and streets
- mowing and whipper snipping
- targeted application of pre-emergent Herbicide

Reactive Manual Treatment – Weed control or eradication

- removing Weeds prior to flowering or setting seed and fruit
- hand pulling
- chipping and frilling
- scraping
- whipper snipping and brush cutting

Reactive Herbicide Treatment – Weed control or eradication

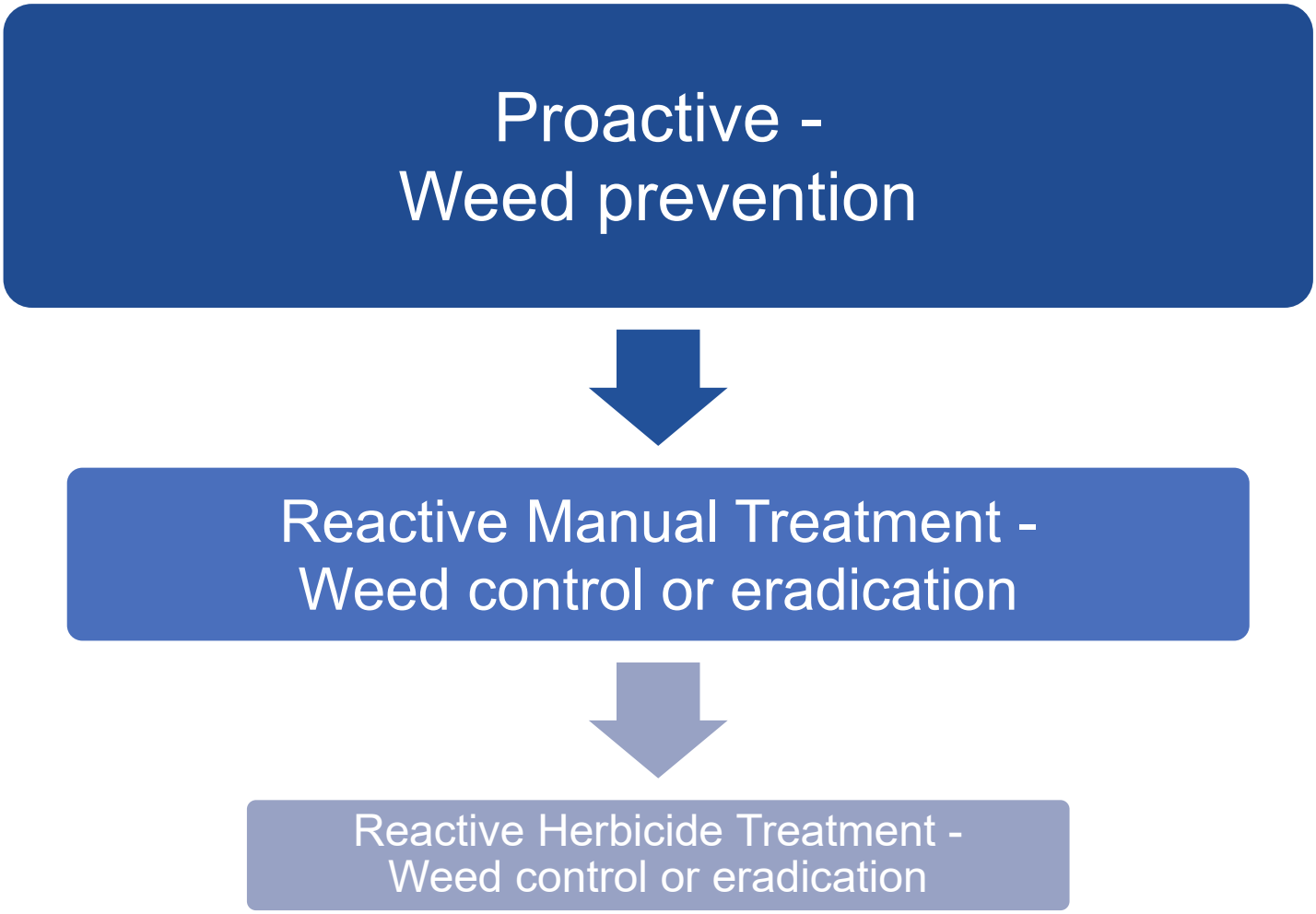
If a Herbicide is required, the Worker will choose the appropriate and least toxic Herbicide required for the Weed, Public Place, situation and risk to meet the Service Levels, noting the following Service Levels for all Public Places:

- Manually remove any Weed equal to or greater than 50mm wide and tall, outside of bush restoration areas
- Manually remove any Weed in bush restoration areas equal to or greater than:
    - 150mm wide and tall for soft-wooded Weeds
    - 400mm wide and tall for woody Weeds

The Worker may elect to use Herbicides in combination with one or more proactive or reactive methods listed above.

Weed management at Sydney City Farm and in community gardens is guided by organic gardening principles and this includes the use of Herbicides. Organically certified Herbicides are used where feasible and effective to treat the specific Weed.

IWM approaches are applied through the following workflow:



Weed Management Principles

The below principles inform and drive the application of the City's IWM across our Public Places:

Public Place	Weed Management Priority
Street gardens and turf verges	• line of sight and clearance for pedestrians, cyclists and drivers • health and safety of pedestrians • contribute to the biosecurity of the Greater Sydney Region • aesthetic values
Streets, laneways, footpaths, kerbs and gutters	
Bush restoration areas	• health and safety of users • contribute to the biosecurity of the Greater Sydney Region • create and enhance habitat for priority fauna species
All other Public Places	• health and safety of users • contribute to the biosecurity of the Greater Sydney Region • use and enjoyment of recreational users • aesthetic values

Weed Management of Public Places

The below table outlines the City's weed management approach for different Public Places.

Public Place	IWM Approach
Playgrounds	• Proactive • Reactive manual treatment • No Herbicide use
Waterplay	
Childcare centres	
Water Sensitive Urban Design	
City managed waterbodies (within 10m of)	
Sydney City Farm	• Proactive • Reactive manual treatment • Herbicide use guided by organic gardening principles
Community gardens	
Parks and sports fields	• Proactive • Reactive manual treatment • Reactive Herbicide treatment used only when Proactive and Reactive
Bush restoration areas	
Street gardens and turf verges	

Public Place	IWM Approach
Public squares	manual measures alone will fail to achieve the required Service Levels
Streets, laneways and footpaths	
Council depots, buildings, and facilities (exterior surrounds of)	
Cliff faces and rock walls	
City managed waterbodies (aquatic Weeds located within the waterbody or its banks)	• Proactive • Reactive manual treatment • Reactive Herbicide treatment used only when Proactive and Reactive manual measures alone will fail to achieve the required Service Levels. Only Herbicide products registered for aquatic use by the Australian Pesticides and Veterinary Medicines Authority (APVMA)

Safe and Responsible Herbicide Use

Herbicide Use

The City only uses Herbicides registered by the APVMA.

The following control mechanisms are implemented when using Herbicides:

- the City uses Herbicides with the lowest toxicity available that will achieve the Service Levels
- Herbicides are used in accordance with the APVMA-approved manufacturer's directions
- notification of pesticide use will be provided as per the City's Pesticide Use Notification Plan
- the City will not use Herbicides where they interfere with bookings for Public Places
- the City will not spray Herbicides on windy days
- use nozzle cones on spray wands wherever possible
- not use pressure sprays where a person or animal is at risk of coming into direct contact with the Herbicide during the application.
- make and keep records of all Herbicide applications in accordance with the City's statutory obligations.

Training

Workers who are involved in the use of pesticides including mixing, calibrating spray equipment and applying pesticides are required to:

- hold a valid Australian Qualifications Framework (AQF) qualification:

  - AQF level 2 if they use Pesticides under supervision of a Worker who has achieved AQF level 3 competency
  - AQF level 3 if they use Pesticides independently, or supervise the use of Pesticides by other Workers
- hold valid proof of competency
- renew their qualification every five (5) years.

Work Health and Safety

To meet the Service Levels and statutory requirements, Workers using Herbicides are required to:

- adhere to the following SafeWork NSW Codes of Practice:
  - Safe use of pesticides in non-agricultural workplaces
  - Managing risks of hazardous chemicals in the workplace
- carry out a risk assessment:
  - to inform the development of an IWM approach, and;
  - prior to applying Herbicides, including assessing the weather conditions and use of the Public Place
- comply with the City's Pesticide Use Notification Plan
- read, be inducted into and familiar with and adhere to the relevant Safe Work Method Statement and Herbicide Safety Data Sheet prior to applying Herbicides
- wear the required personal protective equipment.

Volunteers are not permitted to use Herbicides.

Responsibilities

The Manager City Greening and Leisure and the Manager Property Services are responsible for the implementation of the Weed Management Policy.

Workers will:

Follow and comply with this policy.

Volunteers will

Follow and comply with this policy.

Consultation

This policy has been developed in consultation with:

- City Services
- Chief Operations Office
- Legal and Governance
- City Planning Development and Management
- People, Performance and Technology

- Strategic Development and Engagement

The initial policy was open for public comment from ***day date month*** to ***day date month year*** through the City of Sydney website.

References

Laws and Standards
• Biosecurity Act 2015 NSW
• Biosecurity Regulation 2017 NSW
• Greater Sydney Regional Strategic Weed Management Plan
• Pesticides Act 1999 NSW
• Pesticide Regulation 2017 NSW
• Protection of the Environment and Operations Act 1997 NSW
• Protection of the Environment Operations (General) Regulation 2022 NSW
• Work Health and Safety Act 2011 NSW
• Work Health and Safety Regulation 2017 NSW

Policies and Procedures
• Hazardous Chemicals Operational Procedure
• Personal Protective Equipment Operational Procedure
• Pesticide Use Notification Plan
• Work Health and Safety Policy

Review period

This policy will be reviewed every four (4) years.

Approval Status

Council approved this policy on [DD MONTH YYYY].

Approval History

Stage	Date	Comment	TRIM Reference
Original Policy	(Date, month, year)	Approved by Council	20XX/XXXXXX
Reviewed	(Date, month, year of when it	Briefly summarise key changes	20XX/XXXXXX (Governance to populate)

Stage	Date	Comment	TRIM Reference
	was approved by Council)		
Commence Review Date	DD MONTH YYYY		
Approval Due Date	DD MONTH YYYY		

Ownership and approval

Responsibility	Role
Author	Program Manager Strategy and Contracts
Owner	Manager City Greening and Leisure
Endorser	City of Sydney Executive
Approver	City of Sydney Council