Attachment D

Draft Pesticide Use Notification Plan

Plan
Month 2025

Draft Pesticide Use Notification Plan

We acknowledge the Gadigal of the Eora Nation as the Traditional Custodians of our local area.

CITY OF SYDNEY

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Cover image: Cardigan Street Park, Renee Nowytarger / City of Sydney

1. Introduction

This Pesticide use notification plan (the Plan) has been prepared in accordance with the requirements of the Pesticides Regulation 2017 (the Regulation).

1.1. Purpose

This Plan sets out how the City of Sydney (the City) notifies the community of Pesticide use by the City and allows them to take action to avoid potential contact with Pesticides if they wish.

The City:

- ensures Pesticides are applied to Public Places in a safe, responsible manner, minimising harm to the community and the environment, and;
- is committed to ensuring that Pesticide use is justified, minimised and that the lowest toxicity of Pesticides necessary are used to achieve the City's Service Levels. The City will continue to investigate and use alternatives to Pesticides where available, safe and effective.

The Plan forms a component of the City's integrated pest management approach. This approach ensures the City only uses Pesticides in Public Places when necessary to eliminate weeds, to protect public property from pest damage, and the community from nuisance or danger such as weeds affecting human and animal health. Manual methods of pest management are prioritised and used in the first instance where able and safe to do so.

1.2. Definitions

Term	**Meaning**
Contract 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.
Pest	In relation to an animal, plant or thing – any animal, plant or biological entity that injuriously affects the physical condition, worth or utility of an animal, plant or thing. In relation to a place – an animal, plant or other biological entity that injuriously affects the use or enjoyment of that place.

Term	Meaning
Pesticide	Any substance, or mixture of substances, other than a feed additive, intended for preventing, destroying or controlling any pest. Pesticides are represented by a range of chemicals used to control or eradicate specific Pests and include algaecides, bactericides, baits, herbicides, insecticides, fungicides, miticides, nematicides, rodenticides and termiticides.
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.
Sensitive Place	Has the meaning given to the term in Clause 39 of the Pesticide Regulation 2017 (NSW).
Service Levels	Defined outcomes to achieve the presentation and condition of a Public Place relating to the presence and impact of Pests. Service Levels vary depending upon the type and use of a Public Place, but all Service Levels encourage Integrated Pest Management and include work health and safety and statutory requirements that must be met whilst planning and undertaking any Pest management 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 City Employees.
Worker	All Employees, agency contractors (labour hire), work experience students and Contract Service Providers. Excludes Volunteers.

1.3. Objective

To meet regulatory requirements and the community's right to know about Pesticide applications made to City controlled public places by outlining:

- what Public Places are covered by the Plan
- who regularly uses these Public Places, and an estimated level of use
- how and when the City provides the community with information about its Pesticide applications in Public Places
- how the community can access the Plan and get more information about the City's notification arrangements
- how future reviews of the Plan will be conducted
- contact details for anyone wishing to discuss the Plan with the City.

1.4. Pesticide application

Pesticides are applied within indoor and outdoor Public Places and their use consists of programmed and reactive applications.

1.4.1. Programmed Pesticide application

Programmed Pesticide application includes:

- Pesticides applied under the Pesticide Application Schedule
- the annual application of insecticide for cockroaches, ants and spiders is applied to the interior of City buildings and facilities including indoor swimming pool facilities. This application is scheduled after hours when the Public Place is inaccessible to the public
- baits used to control outbreaks of vermin in Public Places and to protect buildings and structures from damage by termites and soil Pests.

1.4.1.1 Pesticide Application Schedule

The Pesticide Application Schedule consist of two schedules for the programmed application of Pesticides across the following Public Places:

- streets, laneways, footpaths and other outdoor publicly accessible places excluding parks, and;
- parks and open space assets including sports fields (natural and synthetic), street gardens and turf verges, outdoor courts and skate facilities and bush restoration areas.

Each schedule allows for eight applications of Pesticide per year. The timing of the applications differs between the schedules, reflecting the environments and most common Pests and peak growth seasons specific to those Public Places.

The Pesticide Application Schedule is published on the City's website and is updated on an annual basis prior to the commencement of the next calendar year.

1.4.2. Non-programmed Pesticide application

All other applications of insecticides, algaecides, fungicides, miticides, nematicides, rodenticides are applied reactively on an as need basis.

1.5. Integrated Pest Management

Integrated Pest Management (IPM) is the coordinated use of a variety of design approaches and manual methods and techniques in combination with Pesticide use, with the aim of reducing reliance on Pesticides alone, and increasing the chances of successful Pest control or eradication.

The City adopts an IPM approach because:

- we are mindful of the impact the over reliance of Pesticides can have on our environment and community
- Pesticides alone are unable to achieve the City's Service Levels in providing safe, functional, fit for use and aesthetically pleasing Public Places.

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

The approach to IPM follows the below sequence with proactive and reactive examples provided to demonstrate non-Pesticide methods or techniques within those categories:

Proactive – Pest prevention

- designing Public Places with consideration for Pest management, such as hard-edge treatments between turf and garden beds for weeds and the location of park and street furniture.
- selecting plant species resilient to common insect Pests
- growing healthy turf and plants to outcompete weeds and be resilient to insect Pests
- applying mulch to smother weeds
- street sweeping and high-pressure cleaning of footpaths, gutters and streets to remove litter and food waste residues and built-up growing media ideal for weed seed germination
- targeted application of pre-emergent herbicide

Reactive – Pest control and eradication

- physically collapsing rodent burrows
- solar-powered SMART rodent control boxes
- engineered solutions such as installing anti-rodent mesh
- removing weeds prior to flowering or setting seed and fruit
- hand pulling weeds
- physical removal of insects through pruning or by hand

Reactive Chemical Treatment – Pest control and eradication

If a Pesticide is required, the Worker will choose the appropriate and least toxic Pesticide required for the Pest, Public Place, situation and risk to meet the service levels.

- Pesticide in combination with an above reactive method
- Pesticide alone

Pesticide use at Sydney City Farm and in community gardens is guided by organic gardening principles, including the use of organically certified Pesticides where feasible and effective to treat the Pest.

Pesticide use for controlling rodent populations consists of first generation anticoagulant rodenticides (FGAR) and second generation anticoagulant rodenticides (SGAR). Use of rodenticides is reviewed on a regular basis including any impact on wildlife in consultation with the City's Urban Ecology Coordinator.

FGARs are prioritised for areas identified by the Urban Ecology Coordinator, primarily being parks and in proximity to bush restoration areas. SGARS are primarily used in streets, laneways and public squares.

SGARs are the primary rodenticide used as they remain the most effective bait available for controlling rodent populations.

2. Public Places covered by the Plan

The City uses Pesticides in the following Public Places or areas controlled by the City:

- parks and open space, street gardens and turf verges
- barbecue and picnic areas
- sports fields (natural and synthetic)
- bush restoration area
- outdoor courts and skate facilities
- flower displays in hanging baskets and planter boxes (maintained by the City)
- streets, laneways and footpaths
- public toilets
- council buildings, facilities and leisure centres (indoors)
- council buildings, facilities and leisure centres (outdoor landscaped surrounds)
- community gardens
- Sydney City Farm

2.1. Pesticide use in Public Places

The table summarises the regular user groups, estimated level of community use, the types of Pesticides and notification arrangements for each category of Public Place. Further details about notification arrangements are detailed in Section 3. of the Plan.

Public Place or area	**Regular user group**	**Level of use or proximity to Public Place or area**	**Type of Pesticide and application methods that may be used**
Parks and open space	Children and adults School, sporting and recreational groups Eventgoers Workers Companion animals	High	Spot spray and broadscale contact and systemic non-selective herbicides Spot spray and broadscale systemic selective herbicides Spot spray insecticides Spot spray fungicides Spot spray algaecides Spot spray nematicides Spot spray growth regulators Bait rodenticides Bait termiticides **The City does not apply Pesticides in or within the immediate vicinity of playgrounds and waterplay areas.**
Street gardens and turf verges	Children and adults Workers Companion animals	High	Spot spray contact and systemic non-selective herbicides Systemic selective herbicides Spot spray insecticides Spot spray fungicides Bait rodenticides

Public Place or area	**Regular user group**	**Level of use or proximity to Public Place or area**	**Type of Pesticide and application methods that may be used**
Barbecue and picnic areas	Children and adults School groups Workers	High	Spot spray contact and systemic non-selective herbicides Spot spray systemic selective herbicides Spot spray insecticides Spot spray algaecides Bait rodenticides
Sports fields (natural and synthetic)	Children and adults School, sporting and recreational groups Workers	High	<u>Natural sports fields:</u> Spot spray and broadscale contact and systemic non-selective herbicides Spot spray and broadscale systemic selective herbicides Spot spray and broad scale growth regulators Spot spray and broad scale insecticides Spot spray miticides Spot spray nematicides <u>Synthetic fields:</u> Spot spray algaecides Spot spray contact and systemic non-selective herbicides
Outdoor courts and skate facilities	Children and adults School, sporting and recreational groups Eventgoers Workers	High	Spot spray contact and systemic non-selective herbicides Spot spray algaecides Bait rodenticides

Public Place or area	**Regular user group**	**Level of use or proximity to Public Place or area**	**Type of Pesticide and application methods that may be used**
Streets, laneways, footpaths, kerbs and gutters	Children and adults Workers Companion animals	High	Spot spray contact and systemic non-selective herbicides Spot spray algaecides Bait rodenticides
Public toilets	Children and adults Workers	Medium	Spot spray insecticides Bait rodenticides
Council buildings, facilities and leisure centres (indoors)	Children and adults Workers	Medium	Spot spray insecticides Bait rodenticides
Council buildings, facilities and leisure centres (outdoor landscaped surrounds)	Children and adults School, sporting and recreational groups Workers	Medium	Spot spray contact and systemic non-selective herbicides Spot spray systemic selective herbicides Spot spray insecticides Spot spray fungicides Spot spray growth regulators Bait rodenticides
Community gardens	Children and adults School groups	Medium	<u>Prioritises organic gardening principles:</u> Spot spray contact non-selective herbicides Spot spray insecticides Lures (such as Queensland fruit fly lures) Spot spray fungicides Bait rodenticides

Public Place or area	**Regular user group**	**Level of use or proximity to Public Place or area**	**Type of Pesticide and application methods that may be used**
Sydney City Farm	Children and adults School groups Eventgoers	Medium	<u>Prioritises organic gardening principles:</u> Spot spray contact non-selective herbicides Spot spray insecticides Lures (such as Queensland fruit fly lures) Spot spray fungicides Bait rodenticides
Bush restoration areas	Workers Volunteer Landcare and Bushcare groups	Low	<u>Applied by Workers only:</u> Spot spray systemic and contact non-selective herbicides Spot spray insecticides Direct application of non-selective herbicide (cut and paint, drill and fill) Volunteers do not use Pesticides
Floral displays in hanging baskets and planter boxes (maintained by the City)	Children and adults Workers	Low	Spot spray insecticides Spot spray fungicides

3. Notification arrangements

This section of the Plan describes how and when the City provides notice of Pesticide use in Public Places including special measures for Sensitive Places, emergency Pesticide applications, changes to programmed applications and circumstances where notification is not provided.

The notification arrangements are based on the City's assessment of:

- the level of use of Public Places where Pesticides may be applied
- the extent to which members of the community who are most likely to be sensitive to Pesticides, are likely to use these areas regularly
- the extent to which activities generally undertaken in these areas could lead to some direct contact with Pesticides
- the type of Pesticide used.

3.1. Notification methods

Notice of Pesticide use will be provided by a combination of methods as outlined in the below table.

Notice type	**Description**
Pesticide use notification signs (signs)	Installed at the Public Place site of Pesticide application prior to the application of the Pesticide and remaining in place until after the prescribed re-entry period detailed in the Pesticide product label. Signs will contain the mandatory information detailed in Section 4 of the Plan.
City website www.cityofsydney.nsw.gov.au	- The Plan - Pesticide Application Schedule - list of Pesticides the City may use - process for registering for the Spray-Free Register (see Section 3.4. of the Plan) - contact details for Pesticide enquiries
Email	<u>Programmed Pesticide application:</u> Annual email notification of the Pesticide Application Schedule to: - community members and groups registered on the Spray-Free Register (see Section 3.4. of the Plan) - sporting groups with current bookings Sporting groups who make bookings after the distribution of the annual email will be sent a copy of the Pesticide Application Schedule as part of the booking process.

Notice type	Description
	Unprogrammed Pesticide application: For the adjustment of the Pesticide Application Schedule due to wet or windy weather, reactive email notification will be sent to the following impacted entities prior to the application: - community members and groups registered on the Spray-Free Register (see Section 3.3. of the Plan) - sporting groups with current bookings Emergency Pesticide application: See Sections 3.2. and 3.3. of this Plan.
Hard copy of the Plan	Hard copy of the Plan available free of charge at Town Hall Customer Service Centre and Neighbourhood Service Centres.

3.2. Emergency pesticide applications

An Emergency Pesticide application in a Public Place may be required to deal with:

- nuisance (biting) or dangerous insects
- rodents (that pose an immediate health hazard)
- outbreaks of Pests which have an immediate impact on the fit for use condition of City assets

In these situations, the City will provide notice by installing signs adjacent to the application area at the time of the application.

Where the emergency Pesticide application relates to a sports field or Public Place with a booking, the sports group or entity who made the booking will be notified as soon as practicable by phone and email.

See Section 3.3. of this Plan for notification requirements of emergency Pesticide applications for Sensitive Places.

3.3. Special measures for Sensitive Places

Clause 39 of the Regulation defines a Sensitive Place to be any:

- school or pre-school
- kindergarten
- childcare centre
- hospital
- community health centre
- nursing home
- place declared to be a sensitive place by the NSW Environment Protection Authority.

Clause 48 of the Regulation stipulates additional requirements in relation to use adjacent to a Sensitive Place.

Where a Pesticide application is programmed for within 20 metres of a Sensitive Place, the City will provide the occupier (including City owned or managed Sensitive Places) with five (5) days' notice by email, phone or letter box drop (whichever is most practicable).

Pesticide applications inside Sensitive Places that the City owns such as childcare centres for spider, cockroach and ant control, will be applied after hours and where possible on a Friday night. This allows time for the drying and dispersal of the pesticide by the following Monday morning when the childcare centre reopens.

For emergency Pesticide applications adjacent to Sensitive Places, the City will provide notification as soon as practicable prior to the emergency Pesticide application by phone or door knocking. An email notification will also be sent to the occupier and signs installed adjacent to the treatment area at the time of application.

3.4. Spray-Free Register

Residents and occupiers can request that Pesticide use be limited or avoided adjacent their property for streetscapes, laneways, footpaths, street gardens and turf verges, by lodging a request through the City's website to join the Spray-Free Register.

Occupiers of Sensitive Places can also choose to register to join the Spray-Free Register, noting this does not remove the City's obligation to provide notification to the Sensitive Place occupier as per Section 3.3 of the Plan.

Workers are to refer to the Spray-Free Register as part of an IPM approach and will avoid the use of Pesticides adjacent to properties registered on the Spray-Free Register, where possible.

3.5. Place specific notification arrangements

The below tables provides details of individual Pesticide use notification arrangements.

Public place	**Onsite notification**	**Offsite notification**
Parks and open space	Signs installed at prominent locations adjacent to the treatment area and at main entrances to the park or open space.	Pesticide Application Schedule on City website The Plan
Street gardens and turf verges	Signs installed at prominent locations adjacent to the treatment area.	Pesticide Application Schedule on City website The Plan
Barbecue and picnic areas	Signs installed at prominent locations adjacent to the treatment area and at main entrances to the park or open space the barbecue or picnic area are located within.	Pesticide Application Schedule on City website The Plan
Sports fields (natural and synthetic)	Signs installed at prominent locations adjacent to the treatment area for unfenced sports fields and at main entrances of fenced sports fields.	Pesticide Application Schedule on City website The Plan
Outdoor courts and skate facilities	Signs installed at prominent locations adjacent to treatment area and at main entrances.	Pesticide Application Schedule on City website The Plan

Public place	**Onsite notification**	**Offsite notification**
Streets, laneways, footpaths, kerbs and gutters	Signs prominently displayed on vehicles and equipment.	Pesticide Application Schedule on City website The Plan
Public toilets	Signs prominently displayed at the entrance to application area.	The Plan
Council buildings, facilities and leisure centres (indoors)	Signs prominently displayed at the entrance to application area.	The Plan
Council buildings, facilities and leisure centres (outdoor landscaped surrounds)	Signs installed at prominent locations adjacent to treatment area and main entrances.	The Plan
Bush restoration areas	Signs displayed in prominent locations adjacent to the treatment area.	The Plan
Floral displays in hanging baskets and planter boxes (maintained by the City)	Signs prominently displayed on vehicles and equipment.	The Plan
Community gardens	See Section 3.6. of the Plan	The Plan
City Farm	See Section 3.6. of the Plan	The Plan

3.6. When notification will not be given

The City will not provide notification of Pesticide applications in the following circumstances:

- The use of Pesticides that are widely available from retail outlets and ordinarily used for domestic purposes, including home gardening, applied as a ready-to-use product. This includes the minor control of both indoor and outdoor insect Pests using baits or aerosol spray cans. The application of these methods is most commonly used in community gardens or for one-off minor applications for specific pests within one location of a Public Place.
- The application of Pesticides within a Public Place by a person or organisation holding an existing lease of that place.
- Minor spot spraying of Pesticides using a hand or backpack sprayer of no more than 15 litres of mixed concentrate, applied to less than 30m2 per location of a Public Place.
- Direct application of Pesticides through applications such as:
    - stem injection
    - cut and paint
    - drill and fill
    - baits
    - powdered rodenticides (these are applied inside a rodent burrow immediately prior to the forced collapse of the burrow).
- The application of Pesticides within the publicly accessible interiors of City buildings, facilities and leisure centres during out of hours periods when there is no public access.
- The application of Pesticides within fenced worksites closed to the public, such as during park renewals or upgrades.
- Pesticides applied by members of the public to City land, such as a spray application to the turf verge or street garden adjacent to their property.

3.7. Contracted service providers

Where the City uses Contracted Service Providers to apply Pesticides on its behalf, the City will ensure that notification is made in accordance with the notification requirements of the Plan and work health and safety Service Levels adhered to for risk assessments, Safe Work Method Statements, Safety Data Sheets and personal protective equipment.

4. What information will be provided

In accordance with clause 41(1)(h) of the Regulation, notices of Pesticide use must include all the following information:

- the full product name of the Pesticide to be used
- the purpose for which the Pesticide is to be used
- the proposed date/s or date range of the Pesticide use
- the places where the Pesticide is to be used
- contact telephone number and email address of the City officer, whom people can contact to discuss the notice
- any warnings regarding re-entry to or use of the place of application specified on the product label or the permit.

Signs are of a standardised design that will be easily recognisable to the public and workers. See Appendix 2. Pesticide Use Notification Signs.

The City's website features a dedicated webpage that describes programmed Pesticide use in Public Places with a link to the Plan and the Pesticide Application Schedule.

5. How the community will be informed of the Plan

The City advises the public of the Plan and its contents by:

- making a copy of the Plan available for viewing free of charge, at Level 2, Town Hall House, 456 Kent Street, Sydney and at local Neighbourhood Service Centres
- placing a copy of the Plan on the website at www.cityofsydney.nsw.gov.au
- placing an annual notice in local newspapers
- placing a notice in the NSW Government Gazette.

6. Future reviews of the Plan

The Plan is reviewed every four (4) years or when circumstances require a review of the Plan.

The review will include:

- placing the Plan on public exhibition, and calling for any public submissions
- the consideration of public submissions and making recommendations for alterations (if applicable) to the Plan.

The City may consider on reasonable grounds that the amendments to the Plan are not of sufficient substance to warrant further public consultation as part of the review.

7. Contact details

Anyone wishing to contact the City to discuss the Plan or to obtain details of Pesticide applications in public places should contact:

Contract Coordinator Parks

Town Hall House

456 Kent Street

Sydney 2000

Phone: 02 9265 9333

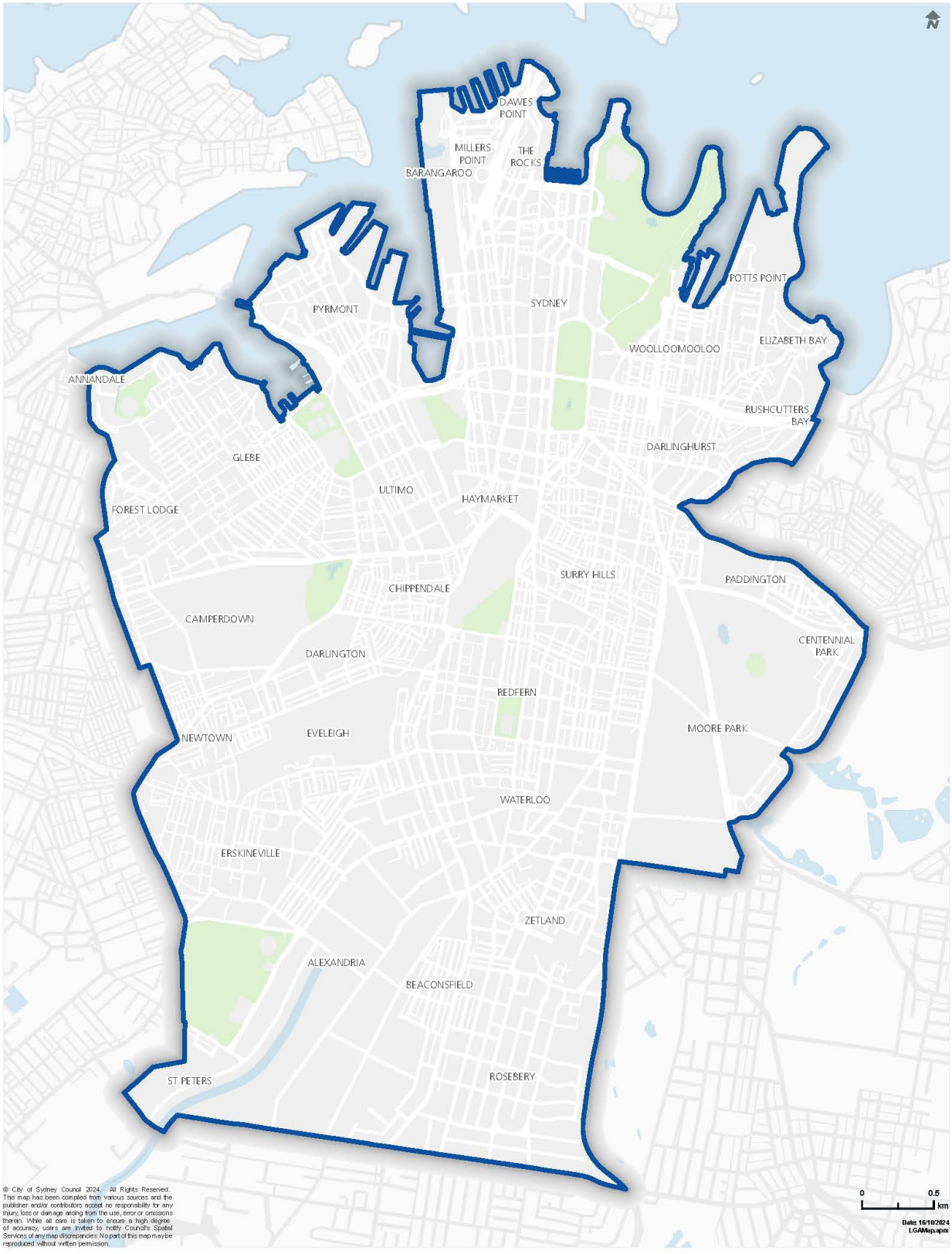
Email: council@cityofsydney.nsw.gov.au

Website: www.cityofsydney.nsw.gov.au

Appendix 1. Map of the Sydney Local Government Area

CITY OF SYDNEY

City of Sydney local government area



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Appendix 2. Pesticide Use Notification Signs

We're managing pests

We are committed to ensuring that pesticide use is **safe, responsible, justified** and **minimised**.

An integrated pest management approach is adopted, to minimise the use of pesticides through **prevention, early detection** and **eradication**.

For more information
call us on 02 9265 9333 or visit cityofsydney.nsw.gov.au

Product applied .....
Place applied .....
Date applied .....
Time applied .....
Re-entry time .....
Pest treated .....

CITY OF SYDNEY

We're managing weeds

We are committed to ensuring that pesticide use is **safe, responsible, justified** and **minimised**.

An integrated weed management approach is adopted, to minimise the use of pesticides through **prevention, early detection** and **eradication**.

For more information
call us on 02 9265 9333 or visit cityofsydney.nsw.gov.au

Product applied .....
Place applied .....
Date applied .....
Time applied .....
Re-entry time .....
Weed treated .....

CITY OF SYDNEY