

Appendix II

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Briefing Note Weed Spraying

Background

Weed growth on the Public Highway is unsightly and can result in damage to the surface of the carriageway or footway. It can also impede the flow of surface water into the highway drainage system. To address this issue, Denbighshire County Council undertake a programme of weed spray treatments 2 times a year usually in March/April and July/August on all urban roads throughout the County. This was previously carried out in March, June and September when the contract was for 3 sprays per annum. Occasionally the scope of the works will increase to include weed spraying of a proportion of the Principal road network.

The weed spray application was undertaken on the urban network by Languard Ltd in 2020. A tender process is currently being undertaken to procure a new supplier with effect from April 1st 2021 for a period of up to 5 years, with an annual review to address supplier performance and effectiveness of the treatments.

The chemical used to treat the weeds is Barclay Trustee Amenity which contains the following chemicals in the concentrations stipulated:

- Glyphosate - 3lt/ha in a volume of 80lt/ha of water
- Codacide – 2lt per 200lt water
- Quartz – 500ml per 100lt water
- Balance – 250ml per 100lt water
- Driftless 0.1 to 0.2 % volume

Glyphosate is the primary ingredient of a number of weed killing products which has recently been in the news in America. Dewayne Johnson, a 46- year-old former groundskeeper, was successful in a court case recently, with the jury determining that Monsanto's Roundup weed killer caused his cancer and that the corporation

failed to warn him of the health hazards from exposure. The principal ingredient of Roundup is Glyphosate. However, It should be noted that Monsanto have contested this judgement and intend to appeal against the recent court ruling.

Glyphosate is the active substance in many herbicides and is widely used around the world. All pesticide active substance approvals are subject to periodic review and the approval of glyphosate has recently gone through this process. In November 2017, the European Union re-approved the continuing use of glyphosate from 16 December 2017. Reviews of the scientific data by the European Food Safety Authority (EFSA) and the

European Chemicals Agency's Committee for Risk Assessment have found no safety concerns that would prevent continuing approval, and UK scientists agree with this assessment. The new approval lasts until 15 December 2022; use beyond that date would be subject to a further decision.

Welsh Government have also issued a recent briefing note following on from the recent legal challenge in America which stipulates that Glyphosate is still an approved product. Refer to Appendix A.

Current Position

As a consequence of the recent court decision and subsequent publicity in America, Denbighshire has received a number of enquiries in respect of our weed spray policy, programme and the chemicals used.

1. Legislation

[The Plant Protection Products \(Sustainable Use\) Regulations, 2012](#)

Part of this legislation requires the government to create a National Action Plan, for the sustainable use of pesticides. This is currently out for industry consultation. The Amenity Forum expect DEFRA will include a requirement for the Amenity Standard.

The [UK National Action Plan for the Sustainable Use of Pesticides](#) details legislation applicable to users, those who cause or permit use and distributors. It also details other mechanisms and measures we use to ensure products are used, stored and disposed of in a sustainable fashion.

2. Compliance

All suppliers that are appointed to undertake weed spraying works on the Public Highway are vetted to ensure compliance with current legislation, codes of practice and Health and Safety. Any supplier using pesticides as part of their professional activities must (including those previously operating under grandfather rights) hold a [recognised specified training certificate](#).

Languard Ltd are a BASIS Amenity Assured Compliant Contractor. The Amenity Assured standard has been developed by key UK organisations which have the responsibility to address the concerns of government, local authorities and many other amenity organisations with regard to amenity weed control.

The aim of the standard is to:

- Set standards
- Audit contractor performance
- Certificate staff and businesses
- Award on merit the associated qualifications

Languard Ltd have also attained the following qualifications and competencies:

To comply with legislation, all weed control operatives must have;

- PA1 Handling of pesticides
- PA2 Boom applicator
And / or
- PA6 hand held applicator

All Languard Limited operatives are qualified with PA1 and PA2.

The Managing Director of Languard Ltd is a Director of the BASIS Amenity Assured Standard Scheme.

3. Chemical Application and rate of spread

All persons applying pesticides in a professional capacity are required to conform to the following;

- Codes of Practice – legislation that specifies training, method of application, environmental protection, record keeping and permissible pesticides to

ensure that pesticides are applied whilst achieving the following;

1. Control the weeds in a safe and controlled manner
 2. Protect the public, pets, wildlife, environment and operator
 3. Minimise the amount of pesticides, where possible
 4. Recorded disposal of containers, packaging and pesticides via registered recycling and disposal companies
 5. No weedspraying is undertaken during rainfall and windy conditions.
- Best Practice – guidelines to be applied, where necessary, as an addition to Codes of Practice
 - COSHH Control of Substances Hazardous to Health – A system of controlling the use of any substance in all industries

The Product used is Barclay Trustee Amenity. Further chemicals are included in the treatment to aid adhesion and reduce drift. The quantities used in the weed spray mix are listed below

- Application rate of Barclay Trustee Amenity is 3 litres / hectare (10,000sq.m)
- Codacide – 2 litres per 200 litres of water
- Quartz – 500millilitres per 100 litres
- Balance – 250millilitres per 100 litres of water
- Driftless - 0.1to 0.2% volume

4. Supplier Method Statement

See Appendix B & C to the rear of this document

5. Exposure

By adhering to legislation, guidelines, manufacturer's labels, training and applying common courtesy to the public, there is an extremely low risk of the public being exposed directly exposed to Glyphosate, particularly when considering the extremely low application rate per square metre of weeds.

Alternative Methods of Weed Control

There are several methods of alternative weed control being put to trial. Listed below are some of the available options:

- Hot foam
- Steam
- High pressure hot water

- Flame gun (gas)

All four of the above will give a rapid kill of the foliage with little or no sustainability, but they will have a limited effect on the roots of smaller grass weeds, chickweed etc., but deeper-rooted weeds such as nettles, docks and dandelions will regrow rapidly after treatment.

Disadvantages of the alternatives above are listed below:

- They are not regulated and do not require certificates of competence, training or registration.
- Using products at 100 degrees in a public environment gives serious cause for concern in terms of the public and third-party property.
- In the case of hot foam, this product will be washed down the drainage system and into water courses.
- Work rates are very slow and the labour cost element is high making the cost to benefit ratio non-viable.

A further alternative is a vinegar and salt solution. The vinegar effectively 'burns off' the foliage and the salt acts as a growth retardant.

- This solution does give fast results and the salt provides a short-term residual effect. In a dry season this effect could be extended, but following any significant rainfall, the salt would be washed away.
- Household vinegar is approximately 5% acetic acid, relatively harmless. To achieve desirable results, it is necessary to use commercial grade vinegar of 20% acetic acid, which becomes a caustic solution.
- As these products are freely available and the solution is not a herbicide, there is no regulation for its use and operatives have no formal training, creating a potential health and safety hazard.
- For the salt to be effective, large quantities in high concentration (to saturation) are required. This may create potential Environmental issues by entering the sub soil in much the same way as nitrates are a current problem.

Conclusion

The existing arrangement is the most economical and effective treatment for killing weeds on the Public Highway. There are other alternatives which do not use Glyphosate based products but there are limitations in terms of effectiveness, speed of treatment, regeneration of weeds and ultimately cost.

Extensive consultation has been undertaken with other authorities in conjunction

with the Association of Public Service Excellence (APSE), which clearly indicates that virtually all councils plan to continue using glyphosate based products for highways weed killing on their road networks. Further details are available upon request.

At the present time, there are no European or domestic based restrictions on the use of Glyphosate based products and the recommendation of the report is that the weed spray operation continue in accordance with current guidelines and constraints.

APPENDIX A

Welsh Government Glyphosate Information Note– August 2018

It is the policy of the Welsh Government to reduce to the lowest possible level the effect of pesticide use on people, wildlife, plants and environment while making sure pests, diseases and weeds are effectively controlled. All pesticide products available in the UK have to meet strict regulatory standards to ensure they do not pose a threat to human or animal health and the environment. The regulatory authorities undertake ongoing scientific research to make sure such chemicals are safe to use and have no long- lasting effect on the environment.

Glyphosate is the active substance in many herbicides and is widely used around the world. All pesticide active substance approvals are subject to periodic review and the approval of glyphosate has recently gone through this process. In November 2017, the European Union re-approved the continuing use of glyphosate from 16 December 2017. Reviews of the scientific data by the European Food Safety Authority (EFSA) and the European Chemicals Agency's Committee for Risk Assessment have found no safety concerns that would prevent continuing approval, and UK scientists agree with this assessment. The new approval lasts until 15 December 2022; use beyond that date would be subject to a further decision.

Risks associated with the use of pesticides in amenity areas, such as parks, is specifically considered as part of the authorisation process. Legally enforceable conditions of use are imposed on the way products can be applied to ensure the public are not exposed to levels of pesticides that would harm health or have unacceptable effects on the environment.

Pesticides in amenity areas should be used responsibly and only as part of an integrated programme of control. They can help deliver substantial benefits for society which include: management of conservation areas, invasive species and flood risks; access to high quality sporting facilities; and safe public spaces (for example, by preventing weed growth on hard surfaces creating trip hazards), industrial sites and transport infrastructure.

In regards to glyphosate use for controlling invasive non-native plant species you may wish to note recent research undertaken by Swansea University examining the physical and chemical control of Japanese knotweed. These were the largest field trials of their kind ever undertaken worldwide. Initial results were published earlier this year. Though no control treatment delivered complete eradication of Japanese

knotweed glyphosate applied at an appropriate dose, phenological stage and level of coverage was found to

be the most effective control treatment. They made a recommendation for stakeholders to discontinue the use of other widely used herbicides for control of Japanese knotweed and unnecessary physical control methods that add equipment and labour costs and increase environmental impacts, without improving control compared to spraying alone.

The Welsh Government works with industry bodies and others to promote best practice in vegetation and weed management in the amenity sector. We support the work of the Amenity Forum in promoting the importance of sustainable pesticide use and developing user practice so that all amenity pesticide users are operating to consistently high standards. We strongly encourage engagement with the Amenity Forum, particularly at Local Authority level, so we can be assured that amenity pesticide users in Wales are conforming to the standards expected under the UK National Action Plan for the Sustainable Use of Pesticides and EU law. The Amenity Forum's main objective is to be the collective body representing the amenity industry, in relation to pesticide use and weed and pest control within the sector. To deliver on this, the Forum has developed a number of activities which include issuing guidance notes to support 'Best Practice' messages, organising conferences and workshops and working closely with the Chemicals Regulation Division of the Health and Safety Executive to ensure the amenity sector meets the requirements of the Nation Action Plan.

Please find below information from the Health and Safety Executive website regarding obligations tailored for those in the amenity sector using professional pesticide products.

Those who use, or cause or permit others to apply, plant protection products or who store and/or dispose of products are subject to a number of legal requirements. Key points to note are:

- Use of plant protection products should be considered as part of an integrated programme of control. The Amenity Forum provides practical advice on how this can be done.
- Anyone who applies pesticides as part of their professional activities must (including those previously operating under grandfather rights) hold a recognised specified training certificate.
- All those purchasing professional plant protection products must reasonably believe that products are used by someone holding a specified certificate.
- All application equipment, except knapsacks and hand-held, must possess a certificate demonstrating that it has passed an officially recognised test conducted by the National Sprayer Testing Scheme. Equipment has to be tested on either a three, five or six yearly basis thereafter depending on when

the most recent test was conducted or the type of equipment. All equipment must be calibrated on a regular basis.

- Users or those who cause or permit use, must ensure that: all reasonable precautions are taken to protect human health and the environment; applications are confined to target areas; and in certain areas (including public spaces and conservation areas) that the amount used and frequency of use is as low as reasonably practicable.
- Priority is given to particular products where there are risks to water quality.
- Professional users and distributors take all reasonable precautions to ensure handling, storage and disposal operations do not endanger human health or the environment.
- Storage areas are constructed in such a way as to prevent unwanted releases of products.

APPENDIX B

Languard Ltd

Method Statement for Applying Herbicides to Emerged Weeds on Footways using a Kubota Compact Tractor

**Only Trained and Competent Operatives are to Perform the Associated Activities within this
Method Statement**

1. Client Details:
<ul style="list-style-type: none">Client details to be made known before work commences and briefed to relevant staff.
2. Relevant Documents:
<ul style="list-style-type: none">A map of the city/borough etc to be treated to be made available to operators. Operators to work from maps and complete a master map for Languard purposes and a master map which is to be kept at the clients offices. Alternatively, a list of sites may be used instead of a map where the works involve treating small villages/towns.Details of areas not to be treated, or areas where caution is needed shall be made known to staff. Details are provided by the client and from previous treatments completed and briefed to staff.Operators to complete Jobsheet 1, Jobsheet 2, timesheet and vehicle/equipment checklist on a daily basis. Vehicle stocksheets to be updated weekly.
3. Scope of the Works:
<ul style="list-style-type: none">Applying herbicides to emerged weeds on footways, back edges, kerbs, channels, tree bases within footways (unless instructed otherwise) including roundabouts, splitters, central reserves etc. Full details to be provided at the pre contract briefing.This method statement only covers the treatment of footways etc within road speeds of 40mph or less. Footways within road speeds greater than 40mph shall be subjected to a specific risk assessment before being treated.
4. Training Requirements:
<ul style="list-style-type: none">Spray operators shall be NPTC PA2A certificated to carry out weed control on Kubota tractors.Spray operators shall be NPTC PA6A certificated to carry out weed control using knapsacks.Spray operators shall have undergone training from experienced staff to carry out weed control to footways using Kubota tractors and knapsacks and be deemed competent. Inexperienced operators shall be supervised at all times.
5. Personnel:

- Number of operators shall be dependent on the size of the contract. Sufficient numbers of operators shall be available to complete the works in the timescales specified by the client.
- A site supervisor(s) shall be available on site at all times. They shall ensure the works are completed in accordance with company policy and the client requirements and shall carry out daily reporting and deal with any issues arising.
- All staff shall attend an induction from the client if necessary before work commences.

6. Plant and Equipment:

- A support vehicle which is fully equipped to carry equipment and materials in accordance with BASIS requirements, statutory code of practice and company policy.
- A Kubota compact tractor equipped with a Hardi spray system, front mounted booms/hand lance. Tractor speed shall be restricted to 4mph (6kph)
- Cooper Pegler knapsack.
- Small handheld pump up applicator for carrying on the tractor.

7. Sequence of Work:

- Operatives will carry out the works in accordance with the contract briefing and client spec.
- Operatives will start in the area specified by the client and carry out the treatment in accordance with training and previous experience. Operatives will complete both sides of the carriageway, working with a structured approach to ensure all areas are completed prior to moving on.
- Operators will travel to site in a support vehicle and park in a safe area in the location they are to be treating without causing disruption to other vehicles, residents and commercial businesses. Adherence to any road markings, signs and parking restrictions must be exercised.
- Operators will offload the Kubota compact tractor from the vehicle (see section 13).
- Operators will carry out pre-use checks on the tractor to ensure it is safe to use in accordance with the checklists provided (SMSF24) and record the results on the weekly checksheet (SMSF23). The tractor shall not be used where any defects are found until suitable repairs have been carried out. Where repairs are beyond the capability of the operator, they shall contact the site supervisor or manager to arrange repairs or a replacement.
- The tractor shall be checked for fuel and topped up when necessary using the drum and funnel from the support vehicle. Any spillages shall be cleaned up using the spill kit provided.
- Once the checks have been carried out, the operator shall fill the spray tank in accordance with section 24 and check that the tractor is calibrated to apply the correct rate.
- The operator shall then secure the support vehicle and commence treatment in accordance with the training provided, this method statement and previous experience of treating footways.
- The operator shall carry out the treatment in accordance with the route planned on the map which is carried on the tractor for easy reference. Where necessary, areas not to be treated or areas requiring knapsacking be marked on this map and the operator shall contact their supervisor to inform them so that a knapsack crew can be assigned to treat.
- Where areas are restricted access to the tractor, or where an area is unsafe for tractor treatment, they shall be marked on the map and treated using handheld equipment. All operators shall carry a small handheld sprayer with them and shall use this to treat small

areas. The tractor must be secured (switched off and key removed) and remain in view whilst treating small areas.

- When the spray tank is empty, the operator shall refill in accordance with section 24.
- At the end of the day, the operator shall ensure the spray tank is empty and the tractor is still serviceable and load it back into the support vehicle in accordance with section 13.
- Job sheets, timesheets etc shall be completed for the day's work.
- Operators shall communicate progress to the site supervisor daily and the master map updated.
- Operators shall plan the next day's work to ensure no areas are missed or treated twice.

8. General Operational Requirements:

- Avoid reversing tractors wherever possible. If reversing is necessary, ensure that you look behind before reversing to ensure no pedestrians or obstructions are at risk. Reverse at a slow speed continuing to observe behind/around you and be prepared to stop.
- Should you, whilst carrying out spraying, be confronted with pedestrians on the footpath, you must stop spraying (park brake applied and in neutral) to allow them to pass (min 5 metre buffer zone). It may be necessary to move onto the road if the footpath is not wide enough. Pedestrians always have the right of way.
- Should you, whilst carrying out spraying, be confronted with obstructions (parked cars, skips, bins etc), you should pass them by means of the road, make a note of the location on your map and if necessary treat the area with your knapsack. **Never** pass by using private driveways or driving on grass verges/gardens – herbicides on the tractor tyres will cause damage.
- Should you, whilst carrying out spraying, be confronted with a narrow gap and you are unsure whether you can pass safely, **leave it**, note the location on your map and treat using a knapsack.
- Should you, whilst carrying out spraying, be confronted with terraced streets with houses that have doors abutting the footway, **extreme** caution must be observed. If necessary, select a lower gear to keep the speed low.
- Should you, whilst carrying out spraying, be confronted with areas such as town centres, shopping areas and school premises, or any are where pedestrian activity is high, carry out the operation at a time when pedestrian activity is low, i.e. early mornings, evenings or weekends. If necessary, leave these areas, make a note of the location on your map and treat at a suitable time. It may be necessary to seek authorisation from the client.
- Should you, whilst carrying out spraying, be confronted with road works, caution must be observed in case workmen are obscured from view. If in doubt, stop spraying, make a note of the location on your map and inform the client or your supervisor.
- Should you, whilst carrying out spraying, be confronted with linking or internal footways, caution must be observed for pedestrians. Drive at a speed suitable to the conditions. Where access is restricted by means of a barrier, you must make a note of the location on your map and treat using your handheld equipment.
- When spraying footways and highways with your tractor, the Highway Code and Chapter 8 must be adhered to. Do not spray on roads with a road speed more than 40 mph.
- The tractor is not fitted with roll over protection (R.O.P.S) because it may create additional risk from low overhead obstructions. In normal use on footpaths the risk of a roll over is not significant. However, caution must be taken when performing some manoeuvres as the risk of the tractor tipping on its side is increased (see section 10 & 11).
- When passing parked cars or obstructions on the road, extreme caution must be observed. Ensure there is a sufficient gap in the traffic to avoid disrupting the flow of traffic.

- When crossing the road on your tractor, be aware that due to the slow speed of the tractor, other vehicles may approach quickly. **Never** cross the road unless you have a sufficient gap in the traffic. Where possible use pedestrian crossings, but be vigilant for pedestrians.
- Never spray herbicides if rain is going to make the application ineffective, or in winds causing spray to drift off target. If the weather deteriorates, stop work, make a note of the location and return to your support vehicle.
- Never drive the tractor on grass verges as damage will result from herbicides covering the tyres.
- Caution must be observed when spraying splitter islands, roundabouts, pedestrian crossings, central reserves etc. Ensure there is a sufficient gap in the traffic to perform the manoeuvre safely. If it is unsafe mark the location on your map and treat using your handheld equipment.
- You must ensure that the directional arrow, warning signs and flashing beacon are clean and visible. If the beacon fails stop work until you have repaired it. Always carry a spare bulb.
- Your tractor is fitted with deflector nozzles which produce a splash over effect when used on a hard surface. Do not allow the splash over to encroach onto verges or gardens. Leave a 10 cm gap between your spray pattern and verges/gardens.
- Never spray right up to picket fencing (gaps between panels) as spray will pass through.
- Never leave your tractor unattended for any reason. Always switch off, remove the key and keep the tractor in eyeshot.
- Application job sheets, timesheets and checklists must be filled out each day and signed at the end of the week. The blue copy of your job sheet must be given to your supervisor.
- Courtesy must be extended to members of the public. If required give them an information card which outlines what you are doing and the contact no. for the Technical Officer.

9. Using the Handheld Lance fitted on the Tractor:

- **Do not** use the hand lance whilst moving.
- Where the use of the hand lance is required to treat around obstacles such as lamp posts and tree bases, the tractor must be stopped, park brake applied and in neutral before the hand lance is used.

10. Mounting and Demounting Footways on a Kubota Tractor:

- Where possible, dropped kerb accesses **must** be used. Dropped kerb accesses are readily available and are found at junctions and premises vehicular entrances
- Where dropped kerb access is unavailable, choose a place with sufficient room to perform the manoeuvre and approach the footpath at a 45° angle, select a low ratio gear to keep the speed to a minimum and drive on one wheel at a time. Be aware that the amount of liquid in your spray tank will affect the stability whilst performing this manoeuvre. If you are unsure of the safety of yourself or your equipment then **do not attempt this manoeuvre** travel to the next drop kerb access, make a note of the location on your map and if necessary, treat using your knapsack.
- When demounting the footpath, approach at a 90 degree angle where possible, use the brake to keep the speed down and drop both front wheels, then both rear wheels simultaneously.

11. Negotiating Corners:

- It is important to keep the tractor speed down when negotiating corners as it may cause sufficient momentum to tip the tractor over on its side. This is increased if a rear wheel clips the kerb, the tank side sway has not been restricted or tyre pressures are incorrect. Always give enough room to turn a corner without clipping the kerb. Always check tank side sway and tyre pressures each morning and adjust if necessary.

12. Driving the Support Vehicle:

- Ensure the vehicle is roadworthy prior to driving by carrying out the checks in accordance with the checklist. Do not use the vehicle if any defects are apparent and contact your Manager.
- Ensure you are familiar with the vehicle controls prior to driving the vehicle. Refer to the manufacturer's handbook where necessary.
- Observe all road signs and markings whilst driving the vehicle. Park the support vehicle in accordance with road signs and markings. Never park the support vehicle on the footway, blocking premise accesses or where parking is not permitted.
- Avoid reversing wherever possible. If reversing is required ensure that there are no obstructions or pedestrians at risk. If necessary get out of the vehicle and check. Always use your mirrors. Perform reversing at slow speeds.
- Be aware that the road speeds for a support vehicle which carries a Kubota tractor are 50mph on single carriageways subject to national speed limits, 60mph on dual carriageways and 70mph on motorways. Do not exceed speed limits.
- Be aware of the braking distances for the vehicle. It will require a greater braking distance than a car due to the size and weight. Be cautious when road conditions are wet or icy.
- Never use your mobile phone whilst driving. Park safely and switch off the engine before making/receiving calls.
- Refer to the contract pack for actions to take in the event of a road traffic accident.
- In the event of a breakdown, contact your Manager who will arrange repairs/recovery.

13. Loading/Unloading the Tractor:

- Ensure the ramps are fitted to the support vehicle correctly with the locating pins in place to prevent the ramps slipping.
- Ensure the tractor wheels are aligned with the ramps.
- Use a low ratio gear to ensure a slow speed is maintained.
- Never engage the clutch whilst going up/down the ramps as the tractor will freewheel backwards and increase speed.
- Ensure any protruding items are clear of any obstructions whilst loading/unloading.
- To prevent instability carry out loading/unloading with the spray tank empty. If necessary pump tank contents into empty drums and label them.
- Carry out loading/unloading with due care and attention to ensure safety.
- Ensure the tractor is butted up to the stop bar when loading to prevent the tractor moving forward, apply the park brake and leave the tractor in low ratio in reverse gear. Use the two 5 tonne rated ratchet straps to secure the tractor using the strapping points provided.
- Never drive the support vehicle with the tractor unsecured, even for a short journey.

14. Inspection and Test Plan:

- All vehicles and equipment shall be inspected before use using the checklists provided. Any defects shall be recorded and rectified before use. If necessary contact your Manager.
- The application equipment shall be calibrated to ensure the correct dose rate is applied and checked on a daily basis. Job sheet to be completed to verify this.

- Sites shall be monitored after completion to ensure treatment has been effective.
- Management shall carry out site inspections to ensure that all staff are complying with the contract specification, this method statement and relevant risk assessment and applicable company policies and procedures. Any staff who fails to comply with any requirements shall be subject to appropriate actions which may include disciplinary action.

15. Risk Assessment and Control Measures:

- SMSF07 RA App Herb to Footways on a Kubota Tractor in Leeds to be carried on site.
- Operators trained in dynamic risk assessment – ie assessing hazards as and when they appear and implementing controls as and when necessary ie stopping, slowing down etc.
- A COSHH assessment for the herbicide(s) to be used shall be completed and briefed to all staff and a copy maintained on site for reference.
- Due to the nature of the works it is very important that all operators are fully trained, certificated and experienced in carrying out footway weed control using a compact tractor. Operators are required to take appropriate actions for the conditions in which they are working in line with the training and experience gained. Any operator who is inexperienced shall be closely supervised until such time as they are deemed competent to carry out the work in a safe manner.

16. Personal Protective Equipment:

- Refer to the COSHH assessment for PPE requirements for handling and applying the herbicide.
- A long sleeved high visibility top to EN471 Class 3 shall be worn at all times on site.
- High visibility trousers to EN471 shall be worn at all times on road speeds greater than 40mph or when instructed by the client.
- Safety boots to EN345 with toe and midsole protection shall be worn at all times on site.
- Work gloves shall be worn on site when necessary to protect hands.
- Hearing protection to EN352 to be provided to operators who request them.

17. Emergency Procedures and Contact Numbers:

- In the event of a road traffic accident follow the procedure contained in the briefing pack. If necessary dial 999 (112 on a mobile) for the emergency services.
- All staff must be in possession of a mobile phone and the number known by staff on site.
- The details of the nearest hospital with an A & E dept shall be included in the briefing pack.
- In the event of a major spillage, drain or ground/watercourse contamination call the Environment Agency on 0800 807060.
- Refer to the COSHH assessment for emergency arrangements for the herbicides used.
- Ensure the 'Instructions in Writing' placards are displayed in any vehicle carrying herbicides to aid the emergency services if necessary.
- A first aid kit (1-10 persons) must be carried in the works vehicle.
- Eyewash (2 x 500ml) must be carried in the works vehicle.
- Emergency drinking water (2 x 500ml) must be carried in the works vehicle.
- A dry powder fire extinguisher (min 1kg) must be carried in the works vehicle.
- In the event of an accident/incident/near miss the accident/incident/near miss report form must be completed and the Safety/Training Manager contacted immediately.
- Contract Director – Tony Marlow 07850 899570
- Safety/Training Manager – Bruce Stevenson 07786 850593
- Technical Manager – Alisdair Mason 07979 802383
- Area Manager – TBC, Site Supervisor - TBC

18. Communications:

- Site Supervisor to communicate with the client on a daily basis or as instructed.
- Site Supervisor to communicate by phone with the Area Manager on a daily basis to inform of progress and any other issues such as breakdowns etc.
- Site Supervisor to arrange communication with other staff/teams as necessary.

19. Traffic Management:

- The support vehicle shall be parked on the carriageway in accordance with the Highway Code.
- The Kubota tractor shall:
 - Be of a conspicuous colour.
 - Have a 610 arrow on the rear to warn approaching traffic to pass to the right.
 - Have a rotating amber beacon visible through 360°.
 - Have warning signs front and rear to warn public of the operation in progress.
 - Be equipped with an audible warning device (horn).
- Where necessary advance warning to other traffic will be provided with the use of a 'Road Works' sign with 'Weed Spraying' supplementary plate placed in advance of the works.
- The Kubota tractor is driven mainly on the footway, however when the tractor is travelling on the road it shall travel in the normal direction of traffic.

20. Welfare Arrangements:

- Toilet facility locations will be briefed at the pre contract briefing and will consist of public conveniences, local services (garages etc) and highway depots.
- Always remove PPE and wash hands before and after using the toilet/eating/drinking.
- Food taken on site must be in a sealed container/package.

21. Waste Management:

- Languard are registered with the Environment Agency as Waste Carriers No. CB/JE5103LZ.
- Empty herbicide containers shall be triple rinsed and the washings incorporated into the spray tank. Empty containers shall be returned to the Languard depot for recycling.
- Cardboard packaging shall be taken to the Languard depot for recycling.
- General waste (food/drink packaging) shall be returned to the depot for disposal.
- Any surplus dilute herbicide shall be minimised by only filling the tank with the required amount. Any left shall be returned to the depot for re-use.
- The site shall be left clean and tidy at the end of the day.

22. Typical Work Environment Hazards On Site:**Slips, Trips & Falls:**

- Staff to inspect work areas for hazards which shall be removed or marked as necessary.
- Staff to wear safety boots with ankle support and rugged tread pattern at all times whilst on site.
- Work to be suspended should conditions become unsafe.
- Care to be taken when getting in/out of the vehicle. Use footplates and hand holds where fitted.

Noise:

- Noise from equipment is 80 decibels and on the low exposure action value. Staff can wear ear protection if they request, but it is not mandatory.
- Busy roads to be treated at off peak traffic times to avoid traffic noise.

- Operators to take regular breaks to reduce exposure.

Vibrations:

- Tractors fitted with suspension seats to reduce vibrations.
- Operators to take regular breaks to reduce exposure.
- Health surveillance questionnaire completed annually.

Weather:

- Wet/cold weather clothing to be taken on site and used where necessary.
- Support vehicle to be used to store clothing and to shelter when necessary.

23 All Operators to Ensure Prior to Working on Site:

- You have attended a pre contract safety briefing and signed to confirm your attendance.
- Before going on site, check the vehicle is fully equipped using the vehicle equipment checklist.
- That the correct items of PPE are available and serviceable in accordance with the COSHH.
- The vehicle and spray equipment are in a safe working condition.
- The spraying equipment is free from leaks and has been calibrated correctly as per instructions at the safety briefing. Check calibration daily and record on your Jobsheet 1.
- Your NPTC spraying ID card is on your person when working.
- A fire extinguisher and first aid kit are in the vehicle and you are trained in their use.
- That you are not under the influence of alcohol or drugs. If taking prescribed medicines check with the Health and Safety Adviser prior to going on site that you are fit to drive the vehicle.
- The correct Personal Protective Clothing (P.P.E) is available and worn when handling and applying the products to be used. P.P.E requirements will be issued with the C.O.S.H.H assessment at the pre contract safety briefing.
- You have sufficient chemical which must be transported securely in the chemsafe at all times.

24. Procedure for Filling the Spray Tank:

- When your spray tank is empty, disengage the P.T.O to avoid excessive wear to the pump.
- Find a fire hydrant that, whilst you are using it, will not cause a disruption to the flow of traffic or block pedestrians use of the footway. Ensure that you use the relevant water authorities' standpipe or your standpipe has the correct tag fixed.
- Using the keyway, open the hydrant slowly until water begins to emerge. Draw off the water until it runs clear. Fit the standpipe ensuring the one way check valve is operational.
- Maintain an air gap between the hose and tank to avoid the risk of any back siphoning into the water supply and contaminating the hose.
- The tractor needs to be running with P.T.O engaged and the regulator control on agitation.
- Half fill the spray tank with water (or half the required volume necessary to complete the work).
- Add the required amount of herbicide ensuring you are wearing the correct P.P.E. Refer to your C.O.S.H.H assessment and the safety briefing for requirements. **Note** if using Glyphosate and a vegetable oil adjuvant they **must** be mixed together before adding to the spray tank. Empty containers must be triple rinsed and the washings incorporated into the spray tank. All containers must be returned to your depot for recycling.
- Top up the spray tank with water without overfilling (or add the remaining quantity required).

- Any spillages must be cleaned up properly using your spill kit and not washed down drains.
- Leave the tank for a short period of time on agitation to ensure the herbicides are properly mixed and wash hands and gloves.
- When disconnecting your standpipe ensure it is fully turned off to avoid water wastage.
- If there is a fault with the hydrant do not use it. If a fault occurs whilst in use it must be reported to your Manager who will report it to the relevant water authority.

25. Amendment/Revision Control:

- Where necessary, this document shall be amended and the issue number and date changed. If an amendment is made, the document shall be re-issued to all relevant staff and re-briefed.

If in doubt about your safety, the safety of others or your equipment, stop work and contact your Supervisor or Manager for advice.

Authorised By	B. Stevenson	Title	Safety/Training Manager	Issue No.	10
Signed	<i>B. Stevenson</i>	Date	21.01.2020	Review Date	21.01.2021

APPENDIX C

Languard Ltd

Method Statement for Applying Herbicides to Emerged Weeds on Footways using a Knapsack

Only Trained and Competent Operatives are to Perform the Associated Activities within this Method Statement

1. Client Details:
<ul style="list-style-type: none"> • Client details to be made known before work commences and briefed to relevant staff.
2. Relevant Documents:

- A map of the city/borough etc to be treated to be made available to operators. Operators to work from maps and complete a master map for Languard purposes and a master map which is to be kept at the client's offices. Alternatively, a list of sites may be used instead of a map where the works involve treating small villages/towns.
- Details of areas not to be treated, or areas where caution is needed shall be made known to staff.
- Operators to complete Jobsheet 1, Jobsheet 2, timesheet and vehicle/equipment checklist on a daily basis. Vehicle stocksheets to be updated weekly.

3. Scope of the Works:

- Applying herbicides to emerged weeds on footways, back edges, kerbs, channels, tree bases within footways (unless instructed otherwise) including roundabouts, splitters, central reserves etc. Full details to be provided at the pre contract briefing.
- This method statement only covers the treatment of footways etc within road speeds of 40mph or less. Footways within road speeds greater than 40mph shall be subjected to a specific risk assessment before being treated.

4. Training Requirements:

- Spray operators shall be NPTC PA6A certificated to carry out weed control using knapsacks.
- Spray operators shall have undergone training from experienced staff to carry out weed control to footways using knapsacks and be deemed competent.

5. Personnel:

- The number of operators shall be dependent on the size of the contract. Sufficient numbers of operators shall be available to complete the works in the timescales specified by the client.
- A site supervisor(s) shall be available on site at all times. They shall ensure the works are completed in accordance with company policy and the client requirements and shall carry out daily reporting and deal with any issues arising.
- All staff shall attend an induction from the client if necessary, before work commences.

6. Plant and Equipment:

- A support vehicle which is fully equipped to carry equipment and materials in accordance with BASIS requirements, statutory code of practice and company policy.
- Cooper Pegler knapsack.

7. Sequence of Work:

- Operatives will carry out the works in accordance with the pre contract briefing and the client specification.
- Operatives will start in the area specified by the client and carry out the treatment in accordance with training and previous experience. Operatives will complete both sides of the carriageway, working with a structured approach to ensure all areas are completed prior to moving on.

- Operators will travel to site in a support vehicle and park in a safe area in the location they are to be treating without causing disruption to other vehicles, residents and commercial businesses. Adherence to any road markings, signs and parking restrictions must be exercised.
- Operators will carry out pre-use checks on the knapsack to ensure it is safe to use in accordance with the checklists provided (SMSF24 & 25) and record the results on the weekly checksheet (SMSF23). The knapsack shall not be used where any defects are found until suitable repairs have been carried out. Where repairs are beyond the capability of the operator, they shall contact the site supervisor or manager to arrange repairs or a replacement.
- Once the checks have been carried out, the operator shall fill the knapsack in accordance with section 20 and check that it is calibrated to apply the correct rate.
- The operator shall then secure the support vehicle and commence treatment in accordance with the training provided and this method statement.
- The operator shall carry out the treatment in accordance with the route planned on the map which is carried for easy reference. Where necessary areas not to be treated shall be marked on this map and the operator shall not treat these areas.
- When the knapsack is empty, the operator shall refill in accordance with section 20.
- At the end of the day, the operator shall ensure the knapsack is empty and still serviceable and load it back into the support vehicle.
- Job sheets, timesheets etc shall be completed for the day's work.
- Operators shall communicate progress to the site supervisor daily and the master map updated.
- Operators shall plan the next day's work to ensure no areas are missed or treated twice.

8. General Operational Requirements:

- When pedestrians are encountered on the footway being treated, you must stop spraying to allow them to pass (min 5 metre buffer zone). Pedestrians always have the right of way.
- Should you, whilst carrying out spraying, be confronted with obstructions (parked cars, skips, bins etc), you should pass them by means of the road. **Never** pass by using private driveways or walking on grass verges/gardens – herbicides on your footwear will cause damage.
- Should you, whilst carrying out spraying, be confronted with areas such as town centres, shopping areas and school premises, or anywhere where pedestrian activity is high, carry out the operation at a time when pedestrian activity is low, i.e. early mornings, evenings or weekends. If necessary, leave these areas, make a note of the location on your map and treat at a suitable time. It may be necessary to seek authorisation from the client.
- Should you, whilst carrying out spraying, be confronted with road works, caution must be observed in case workmen are obscured from view. If in doubt, stop spraying, make a note of the location on your map and inform the client or your supervisor.
- Do not spray on roads with a road speed more than 40 mph.
- Never spray herbicides if it is raining, or in winds causing excessive spray drift. If the weather deteriorates, stop work, make a note of the location and return to your support vehicle.
- Never walk on grass verges as damage may result from herbicides on the soles of your boots.
- Caution must be observed when spraying splitter islands, roundabouts, pedestrian crossings, central reserves etc. Ensure there is a gap in the traffic to perform the manoeuvre safely.
- Knapsacking on hard surfaces will produce splash over. Do not allow splash over to encroach onto verges or gardens. Leave a 10 cm gap between your spray pattern and verges/gardens.
- Never spray right up to picket fencing (gaps between panels) as spray will pass through.
- Never leave your knapsack unattended for any reason.
- Application job sheets, timesheets and checklists must be filled out each day and signed at the end of the week. The blue copy of your job sheet must be given to your supervisor.
- Courtesy must be extended to members of the public at all times. If required give them the telephone number of your depot manager or head office if a dispute/problem cannot be resolved.

9. Driving the Support Vehicle:

- Ensure the vehicle is roadworthy prior to driving by carrying out the checks in accordance with the checklist. Do not use the vehicle if any defects are apparent and contact your Manager.
- Ensure you are familiar with the vehicle controls prior to driving the vehicle. Refer to the manufacturer's handbook where necessary.
- Avoid reversing where possible. If reversing is necessary, the second operator shall act as a banksman ensuring hand signals are known to both employees. If no second operator is available get out and check behind if necessary. Use mirrors and reverse at a slow speed being observant for pedestrians and obstructions.
- Observe all road signs and markings whilst driving the vehicle. Park the support vehicle in accordance with road signs and markings. Never park the support vehicle on the footway, blocking premise accesses or where parking is not permitted.
- Never use your mobile phone whilst driving. Park safely and switch off the engine before making/receiving calls.
- Refer to the contract pack for actions to take in the event of a road traffic accident.
- In the event of a breakdown, contact your Manager who will arrange repairs/recovery.

10. Inspection and Test Plan:

- All vehicles and equipment shall be inspected before use using the checklists provided. Any defects shall be recorded and rectified before use.
- The application equipment shall be calibrated to ensure the correct dose rate is applied and checked on a daily basis. Job sheet to be completed to verify this.
- Sites shall be monitored after completion to ensure treatment has been effective.

11. Risk Assessment and Control Measures:

- SMSF07 RA No. 2 App Herb to Footways using a Knapsack to be carried on site.
- Operators trained in dynamic risk assessment – ie assessing hazards as and when they appear and implementing controls as and when necessary ie stopping, slowing down etc.
- A COSHH assessment for the herbicide(s) to be used shall be completed and briefed to all staff and a copy maintained on site for reference.

12. Personal Protective Equipment:

- Refer to the COSHH assessment for PPE requirements for handling and applying the herbicide.
- A long-sleeved high visibility top to EN471 Class 3 shall be worn at all times on site.
- High visibility trousers to EN471 shall be worn at all times on road speeds greater than 40mph or when instructed by the client.
- Safety boots to EN345 with toe and midsole protection shall be worn at all times on site.
- A hard hat to EN397 shall be worn on site when instructed by the client.
- Work gloves shall be worn on site when necessary to protect hands.
- Hearing protection to EN352 to be provided to operators who request them.

13. Emergency Procedures and Contact Numbers:

- In the event of a road traffic accident follow the procedure contained in the briefing pack. If necessary, dial 999 (112 on a mobile) for the emergency services.
- All staff must be in possession of a mobile phone and the number known by staff on site.
- The details of the nearest hospital with an A & E dept shall be included in the briefing pack.
- In the event of a major spillage, drain or ground/watercourse contamination call the Environment Agency on 0800 807060.
- Refer to the COSHH assessment for emergency arrangements for the herbicides used.
- A first aid kit (1-10 persons) must be carried in the works vehicle.

- Eyewash (2 x 500ml) must be carried in the works vehicle.
- Emergency drinking water must be carried in the works vehicle.
- A dry powder fire extinguisher (min 1kg) must be carried in the works vehicle.
- In the event of an accident/incident/near miss the accident/incident/near miss report form must be completed and the Safety/Training Manager contacted immediately.
- Contract Director – Tony Marlow 07850 899570
- Safety/Training Manager – Bruce Stevenson 07786 850593
- Technical Manager – Alisdair Mason 07979 802383
- Area Manager – TBC, Site Supervisor - TBC

14. Communications:

- Site Supervisor to communicate with the client on a daily basis or as instructed.
- Site Supervisor to communicate by phone with the Area Manager on a daily basis to inform of progress and any other issues such as breakdowns etc.
- Site Supervisor to arrange communication with other staff/teams as necessary.

15. Traffic Management:

- The support vehicle shall be parked on the carriageway in accordance with the Highway Code.
- Operatives shall remain on footways where possible. Where no footway is available the operator shall remain as close to the kerb as possible and remain observant for traffic. Where necessary the operator shall walk facing oncoming traffic.
- Operatives to wear a long sleeved hi-vis top to EN371 Class 3 as a minimum at all times.
- Operatives ensure a sufficient gap in the traffic before crossing the carriageway. Use of pedestrian crossings where available.

16. Welfare Arrangements:

- Toilet facility locations will be briefed at the pre contract briefing and will consist of public conveniences, local services (garages etc) and highway depots.
- Always remove PPE and wash hands before and after using the toilet/eating/drinking.
- Food taken on site must be in a sealed container/package.

17. Waste Management:

- Languard are registered with the Environment Agency as Waste Carriers No. CBDU154914.
- Empty herbicide containers shall be triple rinsed and the washings incorporated into the spray tank. Empty containers shall be returned to the Languard depot for recycling.
- Cardboard packaging shall be taken to the Languard depot for recycling.
- General waste (food/drink packaging) shall be returned to the depot for disposal.
- Any surplus dilute herbicide shall be minimised by only filling the tank with the required amount. Any left shall be returned to the depot for re-use.
- The site shall be left clean and tidy at the end of the day.

18. Typical Work Environment Hazards On Site:

Slips, Trips & Falls:

- Staff to inspect work areas for hazards which shall be removed or marked as necessary.
- Staff to wear safety boots with ankle support and rugged tread pattern at all times whilst on site.
- Work to be suspended should conditions become unsafe.
- Care to be taken when getting in/out of the vehicle. Use footplates and hand holds where fitted.

Noise:

- Busy roads to be treated at off peak traffic times.

Weather:

- Wet/cold weather clothing to be taken on site and used where necessary.
- Sunscreen used to protect exposed skin from sun burn.
- Support vehicle to be used to store clothing and to shelter when necessary.

19. All Operators to Ensure Prior to Working on Site:

- You have attended a pre contract safety briefing and signed to confirm your attendance.
- Before going on site, check the vehicle is fully equipped using the vehicle equipment checklist.
- That the correct items of PPE are available and serviceable in accordance with the COSHH.
- The vehicle and spray equipment are in a safe working condition.
- The spraying equipment is free from leaks and has been calibrated correctly as per instructions at the safety briefing. Check calibration daily and record on your Jobsheet 1.
- Your NPTC spraying ID card is on your person when working.
- A fire extinguisher and first aid kit are in the vehicle and you are trained in their use.
- That you are not under the influence of alcohol or drugs. If taking prescribed medicines check with the Health and Safety Adviser prior to going on site that you are fit to drive the vehicle.
- The correct Personal Protective Clothing (P.P.E) is available and worn when handling and applying the products to be used. P.P.E requirements will be issued with the C.O.S.H.H assessment at the pre contract safety briefing.
- You have sufficient chemical which must be transported securely in the chemsafe at all times.

20. Procedure for Filling the Spray Tank:

- Ensure your knapsack is on a hard level surface to avoid it tipping over, at the side of your support vehicle, away from water courses and the carriageway. Do not place it on grass verges. Ensure you have the correct P.P.E on.
- Using a water drum from your support vehicle half fill the knapsack with water. Do not rest the drum on top of the knapsack opening as you will damage the top which will result in the lid not sealing correctly.
- Pour out the required amount of herbicide into a measuring jug avoiding any spillages.
- Place the lid back on the herbicide container securely and put it back in the support vehicle. Ensure that you are wearing your faceshield when handling the concentrate. Triple rinse the measuring jug with water adding the washings into your knapsack.
- Top up your knapsack with water being careful not to overfill it.
- Replace the lid ensuring it is not cross threaded. If unsure of a good seal then perform a tip test.
- Any spillages must be cleaned up properly using the equipment provided.
- Place the knapsack in the rear of the vehicle and using the correct procedure, put it on your back and gently shake it to agitate the mix. Make sure the vehicle is locked before proceeding.

21. Amendment/Revision Control:

- Where necessary, this document shall be amended and the issue number and date changed. If an amendment is made, the document shall be re-issued to all relevant staff and re-briefed.

If in doubt about your safety, the safety of others or your equipment, stop work and contact your Supervisor or Manager for advice.

Authorised By	B. Stevenson	Title	Safety/Training Manager	Issue No.	11
Signed	<i>B. Stevenson</i>	Date	21.01.2020	Review Date	21.01.2021