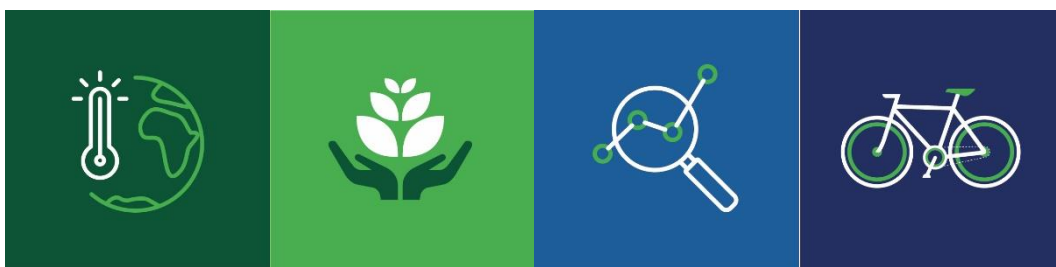


# Environmental Management System

## 8.1.22 Plant Protection Product Management Procedure

**Issued: September 2021**

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<b>Review date:</b>	31 August 2021
<b>Clause Ref:</b>	Ecocampus and ISO 14001:2015
<b>DO NOT PRINT THIS PROCEDURE UNLESS NECESSARY</b>	



# Plant Protection Product Management Procedure

## 1 Purpose

As a University, we are legally required to manage, use and dispose of plant protection products in a way that minimises any negative impacts on the health of people or the wider environment. This procedure is applicable to any group utilising plant protection products, whether based in a Faculty, Professional Service Unit (PSU) or a Contractor.

This procedure focuses on plant protection products and includes the following legislative requirements:

- The Plant Protection Products (Sustainable Use) Regulations 2012 (SI 2012/1657) as amended
- Control of Pesticides Regulations 1986 (SI 1986/1510) as amended
- Wildlife and Countryside Act 1981 (1981 c.69) as amended
- The Natural Environment and Rural Communities Act 2006 (2006 c.16), as amended
- The Official Controls (Plant Protection Products) Regulations 2020 (SI 2020/552)

It is in-line with the 'Code of practice for using plant protection products' (DEFRA *et al*, 2012).

## 2 Definitions

**Pesticide:** This procedure defines pesticides as something that “prevents, destroys, or controls a harmful organism ('pest') or disease, or protects plants or plant products during production, storage and transport...The term includes, amongst others: herbicides, fungicides, insecticides and repellents”<sup>1</sup>.

**Plant Protection Products:** Are 'pesticides' that protect crops or desirable or useful plants. They are primarily used in the agricultural sector but also in forestry, horticulture, amenity areas and in home gardens. They contain at least one active substance and have one of the following functions:

- protect plants or plant products against pests/diseases, before or after harvest
- influence the life processes of plants (such as substances influencing their growth, excluding nutrients)
- preserve plant products
- destroy or prevent growth of undesired plants or parts of plants

They may also contain other components including safeners and synergists <sup>1</sup>.

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<sup>1</sup> Based on EU definition - Source: [https://ec.europa.eu/food/plant/pesticides\\_en](https://ec.europa.eu/food/plant/pesticides_en)

### 3 Responsibilities

<b>Sustainability Team</b>	<ul style="list-style-type: none"> <li>Supporting groups using plant protection product</li> <li>Supporting compilation of information for annual submission (from 2022)</li> <li>Undertaking periodic monitoring</li> </ul>
<b>Health and Safety (H&amp;S) Team</b>	<ul style="list-style-type: none"> <li>Supporting development and reviewing risk assessments</li> <li>Undertaking periodic monitoring</li> </ul>
<b>Group using pesticides</b>	<ul style="list-style-type: none"> <li>Following the requirements of this procedure</li> <li>Complete an annual submission of information to the Sustainability Team, from 2022</li> <li>Report any adverse events arising from pesticide use</li> </ul>

### 4 Related documents

- **Risk assessment:** A template risk assessment and guidance from Health & Safety, [available on the website](#).
- **WMGN 20 Chemical Waste Classification and Storage Guidance:** Guidance on how to store and classify your waste, [available on the website](#).
- **Chemical Waste Store Users Procedure:** Procedure detailing how to access and use the chemical disposal points at Singleton and Bay Campuses, for staff and students, [available on the website](#).
- **Chemical Waste Disposal Form:** Form to be completed as part of the disposal process, [available on the website](#).
- **Chemical Waste Label:** Label to be included on every bottle prior to disposal to the store, [available on the website](#).

## 5 Plant protection product management

All aspects of plant protection product management detailed below are risk assessed by the groups using them, these are available on request from the associated group.

### 5.1 Alternate management methods

Before using any plant protection methods consider whether any treatment is needed at all, bearing in mind the biodiversity duty that the University has under the Environment (Wales) Act 2016. If management is necessary, priority should be given to any alternative, non-chemical approaches. This may include mulching, hand pulling, strimming or heat treatment. If use of chemicals is unavoidable, the least harmful (for humans and the environment) should be used, at the minimum effective dose.

### 5.2 Sourcing and procuring

Plant protection products used on Swansea University premises must be purchased from a reputable seller and contain no banned or restricted substances. Before

purchasing speak to your supplier to understand if there is a less harmful alternative available.

If the group requires a plant protection product, containing restricted materials they must notify the Sustainability Team, who can support them during the licencing process. However, there will need to be a clear justification of the following:

- Why a banned/restricted substance is required
- Why less harmful alternatives cannot be utilised in the activities

Contact details for the Sustainability Team are provided in Section 6.

### **5.3 Storage**

All plant protection products should be stored in line with the Safety Data Sheet (SDS) for the associated material. However as a minimum, storage areas must be designed to prevent release to the environment this includes, but is not limited to:

- Inside a secure, locked location that is access controlled
- A bund that can hold 110% of the largest container
- An inventory detailing what is being stored
- Materials/kit to clean-up any spills or leaks

If the storage area you are using is inadequate, you should raise an 'Adverse Event' (see Section 5.7.2). The Sustainability Team and Health & Safety Team can support you in identifying a suitable location.

### **5.4 Use**

When using plant protection products the users must:

- Protect human health and the environment
- Confine application to the areas intended to be treated
- Ensure the amount used and the frequency of use are as low as reasonably practicable

Information for each of the items above must be included in the risk assessments, safe operating procedures and associated Tool Box Talks. Further detail is provided in Sections 5.4.1 to 5.4.8.

#### **5.4.1 Locations where plant protection product use is acceptable**

Plant protection products can only be used on the following areas:

- Invasive non-native species present at Singleton Park Campus, Sketty Lane Sports Facilities, Bay Campus and Crymlyn Burrows (Site of Special Scientific Interest)
- Paved areas for removal of weed species for aesthetic reasons and the potential they hold to damage or compromise the surfaces integrity
- Sports pitches to improve the quality of the playing surface

Other plant protection products can only be used where a particular problem has been identified and all other control methods ruled out.

If you need to use plant protection products elsewhere please notify the Biodiversity Officer<sup>2</sup>.

### **5.4.2 Training**

Anyone utilising professional plant protection products are required to ‘hold a certificate showing they have sufficient knowledge of the subjects listed in Annex I of the Directive’<sup>3</sup>, this includes:

- Relevant laws
- Risks associated
- Risks resulting from using plant protection products
- Safe working practices
- Emergency action
- Health monitoring
- Record keeping
- Using equipment for application

Section 2 of the Code of Practice for Using Plant Protection Products<sup>4</sup> provides more details on who requires training and who may conduct it. All training records must be up to date and maintained by the Line Manager for that group. Training records may be requested during inspections or audits, without notice.

### **5.4.3 Diluting or mixing of plant protection products before application**

Where dilution of a product is required, this must be undertaken in a location that:

- Utilises drip trays/other containment to catch any spilt materials
- Includes an impermeable surface to prevent contamination of the ground beneath

This activity should be considered on your risk assessment with suitable controls, based on the plant protection product being handled, included. This will include both environmental and health and safety controls.

### **5.4.4 Application method**

Whichever method you use for application you will need to consider:

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<sup>2</sup> [wildlife@swansea.ac.uk](mailto:wildlife@swansea.ac.uk)

<sup>3</sup> Source: <https://www.hse.gov.uk/pesticides/using-pesticides/codes-of-practice/guidance-sustainable-use-ppp-regs-2012.htm#section1>

<sup>4</sup> Source: [https://www.hse.gov.uk/pesticides/resources/C/Code\\_of\\_Practice\\_for\\_using\\_Plant\\_Protection\\_Products\\_-\\_Section\\_2.pdf](https://www.hse.gov.uk/pesticides/resources/C/Code_of_Practice_for_using_Plant_Protection_Products_-_Section_2.pdf)

- Manufacturers guidance on how to use
- Compatibility with the plant protection product you want to use
- Locations where you will use it
- Training of staff who will be using it

Methods may include:

- Hand held
- Mounted sprayer
- Dusts, granules, pellets and baits

This should be considered in your risk assessment and any resulting Safe Operating Procedures.

In addition, if you use mounted equipment you must have:

- 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 and the type of equipment (details are available in the [National Action Plan](#)). All equipment must be calibrated on a regular basis.

### 5.4.5 Rinsing and washing

If any equipment, containers or vehicles have been in contact with plant protection products and require cleaning, you must consider the following:

- Read the manufacturer's instructions for specific guidance on the best methods for cleaning the equipment
- Consult the plant protection product label for any special cleaning instructions
- Wear the protective clothing described on the plant protection product label

Other aspects that should be considered when washing/rinsing include:

- Clean the equipment you have used, inside and out, preferably before leaving the treatment area
- Clean applicators before switching to a different plant protection product.

### 5.4.6 Adverse weather conditions

Plant protection product users should not apply 'pesticides in a way which may lead to drift' therefore weather conditions must be considered before using them, this includes:

- Wind direction and speed. If the wind is likely to cause you miss the area you are targeting the work **should not** be undertaken. See 'Appendix 1: A guide to wind speed' for further guidance.

- Rain: a heavy downpour after application could lead to residues entering local watercourses either directly or indirectly via the surface water drainage network

#### **5.4.7 Record of use**

Whenever any plant protection products are used onsite the 'Appendix 2: Plant protection product use form' must be completed, either:

- On paper with records kept and maintained by the User and uploaded to Teams on a regular basis; or
- Via the Microsoft Form, with periodic downloads to Teams

#### **5.4.8 Accidental release**

If there is an accidental release of plant protection products, staff must:

- Follow the University's '[8.1.03 External Spill Response](#)' procedure, notifying the Sustainability Team if spilt material reaches watercourses or drains (surface or foul)
- Report as an adverse event, through the [University website](#) (see Section 5.7.2)
- Support the adverse event investigation, as required

### **5.5 Disposal**

#### **5.5.1 Packaging and remnants of plant protection products**

Empty, clean packing with no remaining chemical contaminants can be recycled, if labels are removed and the plastic is PET 1 or HDPE 2. They can then be placed into clear bags and placed into the external dry mixed recycling 1100ltr wheelie bins.

Full or empty packaging with chemical contaminants must be disposed to the Chemical Waste Store by following [8.1.5 Chemical Waste Store User Procedure](#).

#### **5.5.2 PPE worn whilst applying plant protection products**

Any disposable PPE worn whilst undertaking the work with plant protection products should be treated as hazardous waste, stored in a red bag prior to disposal. Disposal should follow [8.1.5 Chemical Waste Store User Procedure](#).

#### **5.5.3 Remaining tank mixtures after application**

If you have material left once the application has been completed you will need to remove the material for suitable disposal. Users are responsible for knowing their plant protection products that they are using. As a rule most plant protection products **cannot be disposed to drain**. If there is a substantial volume that will not be required follow the process detailed in Section 5.5.1.

## 5.6 Monitoring

Any group using any form of plant protection product may be subject to periodic inspection or audit by the Health and Safety Team or Sustainability Team. When an inspection or audit occurs the group utilising the plant protection products will be required to produce the records detailed in this document, including but not limited to:

- Associated risk assessment(s)
- Training records
- Records of use (Appendix 2: Plant protection product use form)
- Registrations of any mounted spray equipment

## 5.7 Reporting

### 5.7.1 Annual

The Official Controls (Plant Protection Products) Regulations 2020 (SI 2020/552) require annual reporting of plant protection products used from September 2022. This procedure will be updated with these requirements once an internal process has been agreed.

### 5.7.2 Adverse event

If there is an accidental release of plant protection products, staff must follow the requirements of Section 5.4.8, ensuring an adverse event is registered through the [University website](#). All adverse events will be investigated either by the Line Manager if a low risk event, or by a central team from H&S and/or Sustainability if medium or high risk.

## 6 Additional support

For additional support, you can contact the following:

Role	Email address
Biodiversity Officer	<a href="mailto:wildlife@swansea.ac.uk">wildlife@swansea.ac.uk</a>
Environment Officer	<a href="mailto:sustainability@swansea.ac.uk">sustainability@swansea.ac.uk</a>
Health and Safety support	<a href="mailto:healthandsafety@swansea.ac.uk">healthandsafety@swansea.ac.uk</a>

## 7 Effects and actions of non-conformance

Failure to comply with this procedure may result in:

- Non-conformance with the requirements of EcoCampus and the ISO 14001:2015 standard.

Departure from this procedure is addressed in the procedure **10.1 Nonconformity and Corrective Action**



## 8 Document control

Date	Version	Update
Aug-21	1	New document

## Appendix 1: A guide to wind speed

Beaufort scale (measured 10 metres above the ground)	Description	Visible signs	Guide for using a standard crop sprayer	Approximate wind speed at the height of the spray nozzle
Force 0	Calm	Smoke rises vertically	Use only 'medium' or 'coarse' spray quality	Less than 2 kilometres an hour (less than 1.2 miles an hour)
Force 1	Light air	Smoke drifts, showing the wind direction	Acceptable spraying conditions	2 to 3.2 kilometres an hour (1.2 to 2 miles an hour)
Force 2	Light breeze	Leaves rustle and you can feel the wind on your face	Ideal spraying conditions	3.2 to 6.5 kilometres an hour (2 to 4 miles an hour)
Force 3	Gentle breeze	Leaves and twigs are constantly moving	Increased risk of spray drift. Avoid spraying herbicides and take special care with other pesticides	6.5 to 9.6 kilometres an hour (4 to 6 miles an hour)
Force 4	Moderate breeze	Small branches are moved and leaves and dust are raised	Do not spray	9.6 to 14.5 kilometres an hour (6 to 9 miles an hour)

Source: Code of practice for using plant protection products (DEFRA, 2012)

## Appendix 2: Plant protection product use form

Also accessible via [Microsoft Forms here](#).

<b>Date</b>	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.	Click or tap to enter a date.
<b>Site</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.
<b>Product</b>				
<b>Operator</b>				
<b>Location(s)</b>				
<b>Chemical application rate</b>				
<b>Water application rate</b>				
<b>Nozzle type</b>				
<b>Spray characteristic</b>				
<b>Application method</b>				
<b>Total chemical applied</b>				
<b>Total water applied</b>				
<b>Start time</b>				
<b>Finish time</b>				
<b>Weather</b>				
<b>Surface type</b>				
<b>Growth stage</b>				