

NAME	SUMMARY OF SUBMISSION	STAFF COMMENT
<p>Sarah Carden</p>	<p>Suggested amended wording (shown in red) to Policy as follows:</p> <p>Page 1 Policy Objective - Paragraph 3:Dot Point 3</p> <p>Private landholders or residents who are certified organic, biodynamic producers, chemically sensitive, or have a philosophical aversion to the use of herbicides.</p> <p>Page 1 Policy Objective – Paragraph 5</p> <p>Priority will be given to the safety of people and property, including community infrastructure, when planning and undertaking vegetation treatment, removal and/or tree lopping.</p> <p><i>Comment: The decision to treat or remove vegetation should be a balance between the impact to the natural environment as well as people and property. For example if there is a large tree on a nature strip whose roots are causing damage to the footpath. If the tree is provides significant shade, is a habitat tree or is very old, consideration should include the tree – move the footpath.</i></p> <p>Council will undertake vegetation removal or maintenance to Endangered Ecological Community or vegetation housing threatened species to protect underground services or other infrastructure within the road reserve if it is impacting, or likely to impact, the functionality of the structure or road, any vegetation clearing shall be via a formal documented Review of Environmental Factors (REF).</p> <p><i>Comment: suggest redrafting. A formal document Review of Environmental Factors (REF) must be undertaken before Council will consider the approval of any vegetation removal or maintenance to Endangered Ecological Community or vegetation housing threatened species to protect underground services or other infrastructure within the road reserve if it is impacting, or likely to impact, the functionality of the structure or road.</i></p> <p>Council will endeavour to limit clearing of vegetation to that required for the purposes outlined.</p> <p><i>Comment: This is an important statement should stand alone in it's own paragraph.</i></p> <p><i>Council will endeavour to limit clearing of vegetation to that required for the purposes of:</i> <i>>Managing agreed risks within road reserves</i> <i>>Protecting underground services or other</i></p>	<p>AGREE: Policy amended</p> <p>NO CHANGE: Councils priority is as per the statement, that safety and risk is the priority but having said that, staff do weight up the impact to the natural environment v's engineering solutions and a footpath may well be relocated if the tree is of a significant nature in accordance with Councils tree policy and guidelines. The removal of a tree is considered to be last option, an inspection and a REF is undertaken to ensure the impact to habitat or threatened species is considered and this may involve the placement of boxes in surrounding trees</p> <p>AGREE: Policy amended Council already undertakes a REF and there are additional approvals required to undertake work in and around an EEC</p> <p>AGREE: Policy amended</p>

infrastructure within the road reserve if it is impacting, or likely to impact, the functionality of the structure or road.

Page 1 – 2.0 Related Legislation

Comment: Include another paragraph

This policy aims to provide council workers with the ability to investigate and use forms of weed control other than herbicides, where they feel appropriate and within council's budgetary constraints.

Herbicides are to be used as a temporary measure until environmentally sustainable and cost effective alternative are identified.

Page 2 – 3.0 Definitions 3.1 Principles – Paragraph 1

Comment: Include another sentence at end of Paragraph 1.

This policy does not exclude the use of experimental or environmentally sensitive methods of vegetation treatment that are not specifically identified.

Page 2 – 3.0 Definitions 3. 1 Principles – Paragraph 3

Control methods include slashing and the use of herbicide to manage vegetation including weed species declared under the Biosecurity Act 2015, growing along road verges to reduce fire hazards, improve sight and safety distance and to ensure surface water runoff by maintaining free flowing drains.

*Comment: Note: There are many other methods of weed control being used by other councils. It would be good if the policy allowed the people actually undertaking the work to identify and use any functional alternatives.
For example:*

Control methods include, but are not limited to slashing, planting of native plants, and the use of herbicide to manage vegetation including weed species declared under the Biosecurity Act

AGREE; Policy amended – Council are already doing this.

NO CHANGE; Herbicides will continued to be used until there is a legal direction advising that they are prohibited. Council staff has been investigating alternative treatments, at this point in time herbicides remain the most cost effective in the treatment of noxious weeds. The herbicides utilised by Council in the battle against invasive plant species state that they are not known carcinogenic compounds within their Material Safety Data Sheets.

NO CHANGE: Council staff has been investigation alternative treatments, at this point in time herbicides remain the most cost effective in the treatment of noxious weeds. The herbicides utilised by Council in the battle against invasive plant species state that they are not known carcinogenic compounds within their Material Safety Data Sheets

NO CHANGE; Council will consider alternative methods, that include the planting of native species which has been used in reserves to minimise labour, however the method and must ensure there is no impedance to sight distance and would need to be placed on the property side of the table drain in order to ensure stormwater was not impeded or cause damage to the road pavement.

2015, growing along road verges to reduce fire hazards, improve sight and safety distance and to ensure surface water runoff by maintaining free flowing drains. Council staff are encouraged to cooperate with other councils and researches to identify and use weed control measures that are less time consuming, more economical and not a threat to the environment.

Page 2 – 3.0 Definitions 3.1 Principles – Paragraph 5

Any known populations of high ecological value native or recognised threatened species within the road reserve system will be identified and mapped within the GIS system, with any works surrounding these populations placed under strict constraints.

Comment: recommend amendments as follows:

Any known populations of high ecological value native or recognised threatened species within the road reserve system *or within 15 metres of any water course* will be identified and mapped within the *Geographic Information System (GIS)* system, with any works surrounding these populations placed under strict constraints *including the restriction of the use of herbicides*

NO CHANGE; Council do not have the labour or financial ability to control these areas, the use of legal herbicide is in accordance within their Material Safety Data Sheets. At the moment Council utilises glyphosate (as do a large amount of the general population and the agricultural sector) for the control of weed species, within the bounds of its label constraints. Council utilises "Roundup Bi-active" "frog friendly" glyphosate, which states on its label that it can be legally utilised "For the control of emerged weeds in all bodies of fresh and brackish water which may be flowing, non-flowing or transient. Also for weeds on margins of streams, lakes and dams and in channels and drains". Weed spray operators are trained with ground applicator licences issued by the EPA and are skilled in the identification and control of weedy plant species. Vegetation that is obstructing bridge approaches is an ongoing area of complaint by road users and pedestrians, therefore these areas are targeted throughout roadside spraying operations, only with the use of aquatic registered glyphosate based products. Unfortunately Council does not have the resources to utilise mechanical control techniques for vegetation management on unsealed roads, such as brush-cutting or mowing surrounding bridge approaches or on other roadside infrastructure, as Council currently manage 620 lineal kilometres of unsealed road verge, 540 lineal kilometres of sealed rural roads and 210 lineal kilometres of sealed local roads.

<p>Page 2 – 3.2 Chemical No Spray Register – Paragraph 1</p> <p><i>Comment: amend the wording as follows and please do not limit this to the owners of the land:</i></p> <p>The Applicant, <i>or resident or neighbour</i> of a property can make formal application to Council to be included on the Council’s Chemical No Spray Register which will be developed by Council.</p> <p>Page 2 – 3.2 Chemical No Spray Register – Paragraph 2</p> <p>The Application attracts an application fee and an annual fee for the installation of an identification guidepost at each extremity of the property and sign to be erected on the entry gate and provision of work site warning signs to be installed while vegetation control works are being undertaken on Council’s Road Reserve. Signage and guideposts to be clearly visible from the roadside and after installation by Council become the responsibility of the applicant.</p> <p><i>Comment: This seems excessive. Surely a less involved process can be determined for identifying areas that should not be treated by herbicides. This seems an unreasonable and unnecessary fee. It could be seen as a deterrent.</i></p> <p>Page 3 – 3.2 Chemical No Spray Register – Paragraph 5</p> <p>The Applicant will be given approximately 2 weeks’ notice by email prior to Council applying herbicide to Council managed roadside areas adjacent to any Chemical No Spray areas. If the vegetation within the Chemical No Spray area is found to be overgrown at the time of the application of herbicide, the licensed applicator may apply an approved herbicide to that Chemical No Spray area</p> <p><i>Comment: Suggest that the person (whether Council employed or a contractor) completing the spraying is not the decision maker about if the vegetation is within the rules. An unnecessary spray could cost a farmer their organic certification and a significant financial burden. If a person requesting this has to formally apply, pay a fee, manage the vegetation etc., then it would be expected that if there is an issue then that person be given the courtesy to discuss and remedy the issue.</i></p>	<p>AGREE: Policy amended to reference “resident” only and not the neighbour as it is restricted to the property, the neighbour has the same opportunity to apply for a no spray zone.</p> <p>COMMENT: Price was based on actual costs for guideposts and a sign plus labour costs to install – this is being reconsidered to reduce the cost, however a guide post at the property boundary is the easiest delineation of a no spray zone.</p> <p>COMMENT: Council do not have the labour or financial ability to control these areas, The development of this policy was to acknowledge the certification and in doing so ensure the road reserve is not being used as a buffer zone, If the property owner adheres to the management of the area fronting the road reserve there should be no issue, however there are instances of best intentions that are found to be non-compliant during proper inspections.</p>
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Page 3 – 3.2 Chemical No Spray Register – Excluded Area Paragraph 5

Chemical No Spray areas do not exist within townships or where roadside infrastructure exists such as around guard railing, barrier fencing or bridge approaches.

Comment: Please do not specifically exclude townships. While this policy is specific to roadsides; the spraying of the local play equipment is a serious concern of mine, especially when the problem could be easily dealt with by wippersnipping. It would be good if this register could be open for any request regarding non spraying.

Page 3 – 4.2 Principles Paragraph 1 and 2

The Policy promotes Council's duty of care to take reasonable measures within the limitations of its budget to manage the risks arising on Council's rural and urban road networks. It also recognises the need for a chemical no spray area to be identified for private landholders *and residents* who are certified organic, biodynamic producers, chemically sensitive, or have a philosophical aversion to the use of herbicides.

Control methods include slashing and the use of herbicide to manage vegetation including weed species declared under the Biosecurity Act, established along road verges to reduce fire hazards, improve sight distance and to ensure surface water runoff by maintaining free flowing drains.

Comment: Include the words ' and residents'
Comment: This section has already been covered above in 3.1

Page 3 – 4.3 Scope – Dot Point 6

Comment: Expand GIS

Page 4 – Chemical No Spray Register – Paragraph 1 – Dot Point 5

To achieve an effective mechanism to reduce overall exposure to herbicides.

Comment: To reduce the potential for unintended adverse impacts of pesticide use on the environment.

NO CHANGE: This policy is specific to road side vegetation, spraying in towns is subject to the pesticide notification plan.

AGREE: Policy amended

AGREE: Policy amended

NO CHANGE: Council staff has been investigation alternative treatments, at this point in time herbicides remain the most cost effective in the treatment of noxious weeds. The herbicides utilised by Council in the battle against invasive plant species state that they are not known carcinogenic compounds within their Material Safety Data Sheets and until otherwise legislated Council will continue with their use in accordance with the MSD

**Page 4 – Chemical No Spray Register –
URBAN – Mowing of Footpath Verges**

Comment: Council will systematically plant out footpaths, where appropriate, with native ground covers. With the aim of reducing the amount of mowing required.

**Page 4 – Chemical No Spray Register –
URBAN – Use of Herbicides – Dot Point 2, 3
and 4**

Weed control using herbicide can be carried out on the main arterial roads into the towns eg Mann Street/Riverside Drive, to control growth in gutters, footpaths, median strips, fencing and guardrail as required.

Comment: It would be good to allow the council staff to try alternatives to herbicides. Suggest removing ‘by herbicides’. Or including ‘or by any other means necessary’.

Weed control using herbicide can be carried out in the commercial areas of towns and villages to control growth in pavers, footpaths, against buildings, around electricity poles and landscaping as required.

Comment: Is this really a big problem? We could just live with a few weeds. Could you do an experiment and stop the use of herbicides in these areas as a trial and see if it is really a problem.

Weed control using herbicide can be carried out in recreation areas including beaches, parks and reserves to control growth and to create efficient maintenance as required. Such work can include grass control around bench seating, shelters, drains, fencing, playgrounds and the like.

Comment: delete ‘using herbicide’ or include the ability for council staff to use another method. For example if there is a small area that is constantly being sprayed, an alternative could be to repair the soil and plant something else there that is more aggressive than the specific weed itself.

Page 5 – Paragraph 3

The vegetation control of steep batters and around structures such as bridges, behind guardrails is to be undertaken using herbicide control due to budgetary constraints, the use of a “slope” mower will be used on both sealed and unsealed roads when funding permits

Comment: Remove this “herbicide control due to budgetary constraints”

NO CHANGE: Council staff will do this where it is applicable; areas of concentration have been high risk preface or WHS using manual labour.

NO CHANGE: Council will consider alternative methods, that include the planting of native species which has been used in reserves to minimise labour.

NO CHANGE: Council has trialled steam weeding which was expensive and labour intensive as an alternative method,

NO CHANGE: Council will consider alternative methods, that include the planting of native species which has been used in reserves to minimise labour.

NO CHANGE: Council do not have the labour or financial ability to control all areas, the use of legal herbicide is in

	<p>Page 5 – RURAL – Use of Herbicides – Dot Points 2 and 3</p> <p>Weed control using herbicide can be used to control vegetation growth for a width of 1.0 to 1.5 metres against the edge of the bitumen should this be necessary to assist the mowing program.</p> <p><i>Comment: remove 'using herbicide'</i></p> <p>Weed control using herbicide can be used to control dense vegetation such as lantana where it is deemed not practical to mow.</p> <p><i>Comment: remove 'using herbicide can be'</i></p>	<p>accordance within their Material Safety Data Sheets. At the moment Council utilises glyphosate (as do a large amount of the general population and the agricultural sector) for the control of weed species, within the bounds of its label constraints which is a cost effective solution that meets the budgetary constraints.</p> <p>NO CHANGE: as above</p> <p>NO CHANGE: as above</p>
<p>Paula Flack and Mark Sutton</p>	<p>Commend Council for establishing a 'No Spray' register but urge it to proceed in the spirit of collaboration and cooperation with the community.</p> <p>Item 1: The Policy Objective states [emphasis added]: <i>'The development and purpose of the Roadside Vegetation Management Policy is to provide a balanced compromise between promoting good management of roadside vegetation particularly in relation to:</i></p> <ul style="list-style-type: none"> • <i>environmental values,</i> • <i>Council's Mission Statement and duty of care to manage the risks within its road reserves.</i> • <i>Private landholders who are certified organic, biodynamic producers, chemically sensitive, or have a philosophical aversion to the use of herbicides.'</i> <p>However, it fails to state what the "balanced compromise" is actually between. The statement would make sense if the words 'a balanced compromise between promoting' were removed.</p> <p>Item 2: The '<i>Related Legislation</i>' list is incorrect. The <i>Native Vegetation Act 2003</i> and the <i>Native Vegetation Regulation 2013</i> were repealed on 25 August 2017 and replaced with two new pieces of legislation and a SEPP. The list should be updated.</p>	<p>AGREE: Policy amended, staff copied and pasted the extract an incorrect reference to the Act was included, this was realised after the Policy had gone out.</p>

<p>Item 3: We do not oppose the application of a reasonable one-off fee (no more than \$15/per property) to be placed on the register but we <i>thoroughly object to the proposed 'base fee of \$500 GST Exempt plus an Annual Fee of \$30 incorporated through the Property Rates Notice for a five year approval period.'</i> This onerous fee would not only act as a powerful disincentive to register, but would also be unaffordable for many. We question Council's motives for proposing these fees, especially given the weak and insufficient justification for the amount.</p> <p>The above fee statement is silent regarding what happens after the five year approval period expires. Is there an intention to slug us again for another \$500? This omission should be addressed for transparency.</p> <p>We note that all other councils in our region have a chemical sensitivity register, but not one charges a fee.</p> <p>Conflict with Council's adopted Community Strategic Plan which states:</p> <p><i>'This Community Strategic Plan is based on the Social Justice Principles of equity, access, participation and rights. There should be fairness in decision-making, prioritising and allocation of resources, particularly for those in need. Everyone should have a fair opportunity to participate. The planning process should take particular care to involve and protect the interests of people in vulnerable circumstances.'</i></p> <p>The fees are apparently intended for <i>'the installation of an identification guidepost at each extremity of the property and sign to be erected on the entry gate and provision of work site warning signs to be installed while vegetation control works are being undertaken on Council's Road Reserve.'</i></p> <p><i>Identification guidepost at each extremity of the property:</i> Guideposts already exist along rural roads, and in the past, a simple pink cross or some pink flagging tape on nearby vegetation has been successfully used to identify the property boundaries. We are also aware that contractors now have the appropriate coordinates entered into their GPS system which alerts them to property boundary locations. From past experience, any special marker or identification sign of a 'No Spray' property has been swiftly stolen, vandalised or chucked over the bank and sadly, we have no reason to think that much would have changed. We therefore flatly refuse to pay for something we know will disappear in no time. Council's regular guideposts must be relatively cheap</p>	<p>COMMENT NOTED; an alternate is being proposed for the fee. Price was based on actual costs for guideposts and a sign plus labour costs to install – this is being reconsidered to reduce the cost, however a guide post at the property boundary is the easiest delineation of a no spray zone.</p> <p>COMMENT: The intent of the \$500 fee was a one off payment. The five year approval period is now removed. The fee has been reduced and there is no ongoing \$30 annual fee thereafter.</p> <p>COMMENT: Council do not have the labour or financial ability to control all of these areas, The development of this policy was to acknowledge the certification and residents adverse to chemical spraying and in doing so ensure the road reserve is not being used as a buffer zone, If the property owner adheres to the management of the area fronting the road reserve there should be no issue, however there are instances of best intentions that are found to be non-compliant during proper inspections.</p> <p>Guideposts have been identified by staff as the best form of identifying the start/stop point and it was intended to place a unique number on the guidepost to identify the property, flagging tape on nearby vegetation is not appropriate and easily identifiable which may lead to inadvertent spraying. Part of the registration process is to capture the coordinates of the property to enter into GPS systems that will alert the spraying contractor of no spraying.</p> <p>It is noted that a sign may not be appropriate, however staff have been advised by the organic growers that they are required to have a sign on their gate.</p>
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	<p>given the numbers we observed to be mangled after road grading. We suggest Council sticks to a simple splash of fluro paint to a regular guide post and/or flagging tape at, or in close proximity to, relevant property boundaries. We will happily buy a can of spray paint to maintain our posts (although I hate pink) but we will not pay for the purchase and ongoing likely replacements of designated special signs.</p> <p><i>Sign to be erected on the entry gate:</i> Signs on entry gate are also a waste of money given that many rural properties either do not have an entry gate, or the main gate is out of view of the road, as is ours. It is unclear why the property gate should need a sign anyway. So, again an unnecessary fee.</p> <p><i>Provision of work site warning signs to be installed while vegetation control works are being undertaken on Council's Road Reserve:</i> We can appreciate the need for safety precautions in this regard. Our property's roadsides generally have good site lines and we have never needed such signs. When on the ground we wear fluoro work vests and can hear vehicles approaching for some distance. We do not agree with the blanket requirement for this measure, as signs may not be necessary depending on the area being attended. We suggest that registered property owners be advised that for personal safety, warning signs and a fluoro vest is deemed best practice and are recommended. An indemnity form may be considered.</p> <p>Item 4 Given that the policy states '<i>The onus will be on the Applicant to maintain the roadside vegetation to an acceptable standard if the area is on an approved Chemical No Spray Register.</i>', information should be provided to those registering as to what is deemed an "acceptable standard". For example, 'No Spray' property owners should not be required to maintain their roadsides to a standard or frequency higher than that provided to other property owners by Council.</p> <p>Item 5 The policy should recognise all organic and biodynamic producers not just certified ones.</p> <p>Item 6 Regarding control methods, we do not accept the costings presented in the Roadside Maintenance Operations Report by Council staff to Council at its meeting on 13 December 2018 as a genuine and accurate attempt to provide comparisons of various vegetation management</p>	<p>NOTED</p> <p>NOTED: if there is no spraying undertaken the onus must be placed on the property owner to manage their frontage for invasive weed as Council does not have the labour resource or budget to do so, 'No Spray' property owners should not be required to maintain their roadsides outside the standard or frequency higher than that provided by Council to other property owners. However if invasive weeds species are relevant the expectation is the property owner will manage the weeds outside of chemical control.</p> <p>AGREE: The policy does acknowledge this as well as residents adverse to chemical use.</p> <p>NOTED</p>
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	<p>methods. The report was deeply flawed in that it did not consider an integrated management option and costed for a level of service for flail (?reach) mower that has never been seen before (six times a year!). We are lucky to see four grades a year and generally in the past roadside spraying has occurred only once a year on North Arm.</p> <p>We therefore consider the cost comparison inaccurate and imbalanced and thus meaningless. We reiterate our request that Council consider the introduction of a flail mower to its roadside vegetation management in the next Environment Levy budget.</p> <p>Item 7 It is of concern that section 4.3 'Scope' does not include as a goal, the intention to minimise the use of chemical herbicides where possible. Most other Councils whose policies we have read recognise the impacts of over reliance on pesticides such as pesticide resistance and resurgence of pest populations and aim to reduce use where possible. We urge council to include such a goal and apply it to practices. We note however and commend the statement '<i>To support the considered use of pesticides to reduce the volume of pesticide used in Local Government.</i>' under the <i>Chemical No Spray Register</i> section on page 4.</p> <p>Item 8 We do not support the use of chemical herbicides around bridges and drains irrespective of whether the chemical is deemed fit for use over water. We are pleased to see on page 5 the statement '<i>the use of a "slope" mower will be used on both sealed and unsealed roads when funding permits.</i>' We believe that if there was staff and council support for such a management option, then funding would be found for this more environmentally safe method of vegetation control around water courses. The most obvious, appropriate and available source of funding is the Environmental Levy.</p>	<p>NOTED: The policy was developed from reading other LGA policies.</p> <p>NOTED: Council do not have the labour or financial ability to control these areas, the use of legal herbicide is in accordance within their Material Safety Data Sheets. At the moment Council utilises glyphosate (as do a large amount of the general population and the agricultural sector) for the control of weed species, within the bounds of its label constraints. Council utilises "Roundup Bi-active" "frog friendly" glyphosate, which states on its label that it can be legally utilised "For the control of emerged weeds in all bodies of fresh and brackish water which may be flowing, non-flowing or transient. Also for weeds on margins of streams, lakes and dams and in channels and drains". Weed spray operators are trained with ground applicator licences issued by the EPA and are skilled in the identification and control of weedy plant species. Vegetation that is obstructing bridge approaches is an ongoing area of complaint by road users and pedestrians, therefore these areas are targeted throughout roadside spraying operations, only with the use of aquatic registered glyphosate based products. Unfortunately Council does not have the resources to utilise mechanical control techniques for vegetation management on unsealed roads, such as brush-cutting or</p>
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	<p>Item 9: The section headed 'RURAL - Use of rubber wheeled excavator and flail mower for Rural Roadsides', is confusing. The title of this section refers to "flail mower", the first para refers to "reach mower" and the second para refers to "flail mower" again. Are these machines one and the same?</p> <p>We are pleased to see recognition that '<i>Reach mowing reduces the amount of herbicide use as noxious and environmental weeds are mechanically controlled through the use of the reach mower, thus reducing the need for herbicide control</i>'. Is a reach mower the same as a slope mower also referred to in this policy? Consistent language or a glossary of terms would be helpful.</p> <p>The final para also needs clarification especially the id est which states '<i>i.e. Wilson Road (Class 1) versus Lemans Road (Class 4)</i>.' which makes no sense out of context.</p> <p>We are pleased to see, but rather intrigued by, the statement in this section which states in part that '<i>The utilisation of the wheeled-excavator powered reach mower is cost effective to Councils maintenance operations</i>'. This appears to be in direct conflict with the aforementioned Roadside Maintenance Operations Report by Council staff to Council at its meeting on 13 December 2018 which places very high costings (albeit significantly inflated in our opinion) on this method.</p> <p>Item 10: Under heading 'RURAL - Use of Herbicides' it states that 'Council's Pesticide Notification Plan applies' but omits to include amongst the dot points the notification requirements for spraying.</p> <p>We note under clause 3.0 of Council's Pesticide Use Notification Plan that the policy is worded in such a way as to enable Council to avoid having to undertake notification.</p> <p><i>These notification requirements are based on Nambucca Shire Council's, assessment of:</i></p> <ul style="list-style-type: none"> • <i>The level of usage of public places where pesticides are to be applied.</i> • <i>The types groups of the public who are likely to come in contact with pesticides within public places and their potential sensitivity to</i> 	<p>mowing surrounding bridge approaches or on other roadside infrastructure, as Council currently manage 620 lineal kilometres of unsealed road verge, 540 lineal kilometres of sealed rural roads and 210 lineal kilometres of sealed local roads.</p> <p>Intended to refer to Reach Mowing NOTED: Will elaborate the terminology of road hierarchy road system.</p> <p>NOTED: the use of the machinery is limited to the available budget and areas of high risk requiring this treatment it is far more expensive than using chemical control.</p> <p>NOTED: Council's Pesticide Notification Plan is a separate document and a reference is made to direct people to the plan.</p> <p>NOTED: Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p>
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pesticides.

- *The extent of activities that may be undertaken within Public places that may raise the potential for the public to come in direct contact with pesticides (such as picnic areas where food is to be consumed; children groups coming in contact with pesticide in playgrounds / ovals; sporting and other recreational activities that result in contact with the ground, thus increasing the potential for contact with pesticides).*

- *The types of pesticides to be used within public areas.*

Notice of pesticide use will be provided by a combination of any or all of the following depending on the level of public use and potential for contact with pesticides by the public:

- *Signage during application*

- *Information at Council Administration Centre during business hours*

- *Notification in person or by letter prior to pesticide application in or around areas deemed to be sensitive in nature (i.e. public places including kindergartens, pre-schools, schools, nursing homes, Hospitals).*

- *Notices in the local newspaper outlining any broad scale selective or non-selective pesticide use within sporting ovals and playgrounds.*

- *Door knocks / public announcement via radio of emergency pesticide applications.*

We are aware that signs notifying that spraying is underway have not been used for years and feel strongly that they should be for the sake of public safety and transparency.

We also note that bus shelters are recognised as sensitive places under the Pesticide Use Notification Plan. Clause 4.0 states that [emphasis added]:

Where Council will be applying pesticides in or near areas deemed to be sensitive in nature, Council will utilise the following methods to notify the appropriate representative within the above sites:

- *Door knocking or telephoning the sensitive place prior to the application of pesticides;*

- ***Displaying pesticide application signage on vehicles or temporary signage warning the public of the pesticides application, which will be removed post application;***

- *Provide contact details of responsible Council Staff details and other information as requested by the public on the use of pesticides in or near these sensitive areas.*

In rural areas every property driveway where school children reside is a 'bus shelter' where children gather and wait for the bus. As such it is important that parents know when spraying has taken place so that children are not unwittingly exposed to direct unprotected contact with

	<p>herbicides while standing on the road reserve.</p> <p>We totally disagree with the approach described in the first dot point on page 6: <i>'After the use of the "rubber wheeled excavator and flail mower" to cut down vegetation there will be regrowth. This should be treated with a herbicide suitable for woody weeds to improve the effectiveness of the work.'</i> We have not seen any evidence that this is an effective method, on the contrary. Chemically treated verges are left denuded and vulnerable to erosion and proliferation of woody weeds and noxious plants. It is a counter productive and short-sighted approach which completely defeats the purpose and benefit of mowing in the first place.</p> <p>Item 11 Section 6.0 Related Procedures or Documents, should include the Pesticide Use Notification Plan.</p>	<p>NOTED</p> <p>AGREED</p>
Susan Hedgecoe	Burden of the \$500 fee	COMMENT NOTED: an alternate is being proposed
Sally Hooke and Peter Quirk	Burden of the \$500 fee Wants increase of mechanical control	COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets.
Robert Macindoe	General Support Object to the \$500 fee Prefer Rubber Wheeled excavator and flail mower	COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets.
Thomas Macindoe	agrees with the intent to develop a register and believes the road side management has improved Burden of the \$500 fee Notification of what is being sprayed Prefer flail mowing	COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.
Mathew McGovern	Opposed to the policy in its current form Burden of the \$500 fee and clarification on the fee make up Issue with loss of certification Notification period of council works WHS	COMMENT NOTED; an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works. The policy was developed to ensure that a road reserve was not considered as buffer

<p>Nambucca Valley Conservation Association inc</p>	<p>Related legislation is out of date. Change to Biodiversity Conversation Act 2016.</p> <p>Agrees with the intent to develop a register</p> <p>Strongly oppose the \$500 fee</p> <p>What happens after 5 years?</p> <p>Costs for establishing register should come from Environment Levy fund</p> <p>Register should recognise uncertified organic produces as well as certified.</p> <p>Encourage Council to fund the increased use of the wheeled excavator powered reach mower through the Environment Levy.</p> <p>Strongly oppose use of chemicals at bridges and watercourses.</p> <p>Public should be aware of the type of chemical being sprayed and when it is going to occur.</p>	<p>zone as per an APZ which therefore requires the organic certified property maintain a buffer within their own property</p> <p>AGREE: Policy amended, staff copied and pasted the extract an incorrect reference to the Act was included, this was realised after the policy had gone out.</p> <p>An alternate is being proposed for the fee, mechanical treatment is subject to budgets.</p> <p>The policy was developed to ensure that a road reserve was not considered as buffer zone as per an APZ which therefore requires the organic certified property maintains a buffer within their own property.</p> <p>The intent of the register is to include and recognise persons that are adverse to herbicide.</p> <p>Consideration is being given to using the Environmental Levy to fund the development of the register.</p> <p>Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p> <p>Council do not have the labour or financial ability to control these areas, the use of legal herbicide is in accordance within their Material Safety Data Sheets. At the moment Council utilises glyphosate (as do a large amount of the general population and the agricultural sector) for the control of weed species, within the bounds of its label constraints. Council utilises "Roundup Bi-active" "frog friendly" glyphosate, which states on its label that it can be legally utilised "For the control of emerged weeds in all bodies of fresh and brackish water which may be flowing, non-flowing or transient. Also for weeds on margins of streams, lakes and dams and in channels and drains". Weed spray operators are trained with ground applicator licences issued by the EPA and are skilled in the identification and control of weedy plant species. Vegetation that is obstructing bridge approaches is an ongoing area of complaint by road users and pedestrians, therefore these areas are targeted throughout roadside spraying operations, only with the use of aquatic registered glyphosate based products. Unfortunately Council does not have the</p>
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		resources to utilise mechanical control techniques for vegetation management on unsealed roads, such as brush-cutting or mowing surrounding bridge approaches or on other roadside infrastructure, as Council currently manage 620 lineal kilometres of unsealed road verge, 540 lineal kilometres of sealed rural roads and 210 lineal kilometres of sealed local roads.
Gai Nowland	Burden of the \$500 fee Wants increase of mechanical control	COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets.
David Phillips	<p><i>Principles</i></p> <ol style="list-style-type: none"> 1. The draft Roadside Vegetation Management Policy provides that “<i>Council has a requirement to maintain vegetation within the road reserve system to provide appropriate vision and safety for road users</i>”. The draft policy fails to satisfy this requirement by not placing emphasis on maintenance of narrower, poorly aligned roads where overgrown vegetation is more likely to obstruct sightlines and compromise safety. 2. Funding for maintenance of lower use roads to be reallocated from higher use roads where sightlines, road width and alignment can accommodate a lower level of vegetation management. <p><i>Biosecurity Act 2015</i></p> <ol style="list-style-type: none"> 1. The draft policy will do little to address the requirements of the Act to eradicate, contain or control weeds listed in the North Coast Regional Strategic Weed Management Plan 2017-2022. Rather, extensive and intermittent use of herbicides is likely to encourage more resistant species and to lead to erosion and slumping of the susceptible soils in the Nambucca area. <p><i>Chemical No Spray Register</i></p> <ol style="list-style-type: none"> 1. Council should be applying the ‘precautionary principle’ to use of herbicides and should be limiting their use as much as possible. Such an approach is being taken by many other Councils. 2. The requirement for a Register and roadside marking is questionable as a system already exists within Council for residents to identify 	<p>COMMENT NOTED: The width of the existing rural road network is an entirely different issue and is subject to funding limitations along with the terrain as the roads outlined in past correspondence with Mr Phillips are cost prohibitive due to the number of vehicles, steep embankments either side of the road. Council maintenance is to remove the overhanging vegetation to open up sight distance on crests and curves on these narrower pavements.</p> <p>Where feasible staff do attempt to rationalise the works to address safety issues, the priority and risk management addresses the higher used road network before undertaking work or isolated work on the lower uses road network, are maintained by Council as a risk mitigation – the philosophy is the resident can travel along a higher used maintained road. However staff do recognise that the lower use roads have sight distance issues and remove the overgrown vegetation.</p> <p>NOTED</p> <p>Council do not have the labour or financial ability to control these areas, the use of legal herbicide is in accordance within their Material Safety Data Sheets.</p> <p>Council has a discriminant register that has been kept by individual staff following a request from a property owner, there</p>

	<p>no spray areas.</p> <ol style="list-style-type: none"> 3. The charges associated with the proposed Register represent an exorbitant and inequitable tax that appears to be designed to encourage use of herbicides over other methods of vegetation management. 4. It appears that no other NSW council charges ratepayers to be included on 'No Spray' registers. 5. An alternative approach is proposed with costs to be met by Council from the Environment Levy. <p><i>Mowing of Rural Roadsides</i></p> <ol style="list-style-type: none"> 1. Use of the tractor/slasher combination for roadside vegetation control on sealed roads should be extended to unsealed roads. 2. Slashing of roadside vegetation should be the preferred control method rather than use of herbicide. 3. Where herbicide is used, dead standing vegetation should be knocked down in order to restore sightlines and enhance user safety. 	<p>are a significant amount of interest to develop the formal register The policy was developed to capture the other residents and to also ensure that a road reserve was not considered as buffer zone as per a fire APZ which therefore requires the organic certified property maintains a buffer within their own property</p> <p>There is a cost to set up and maintain a register, Council has limited staff resources.</p> <p>NOTED; not all residents agree with continued slashing of the road side and believe it may contribute to the spread of invasive weeds. The intent of herbicide contra is to reduce the grass generated between slashing. Council resolved a number of years to reduce the width to 2 m on the sealed verge. The issues on gravel rural pavements are the grass must be removed during a grade.</p>
Sue Salvin	<p>Burden of the \$500 fee</p> <p>Negative impact of chemical use</p> <p>Wants increase of mechanical control</p>	<p>COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p>
Kaycee Simuong	<p>Burden of the \$500 fee and clarification on the fee make up</p> <p>controversy on the use of chemicals</p> <p>more mowing and slashing of unsealed roads</p>	<p>COMMENT NOTED; an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p>
Sue Smoothy	<p>Opposed to proposed fee and the fact council are not providing a service and wants the ability of resident maintaining their property</p> <p>controversy on the use of chemicals</p>	<p>COMMENT NOTED; an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p>
Marion Syratt	<p>Burden of the \$500 fee</p> <p>more mowing and slashing of roads and use of steam treatment</p>	<p>COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside</p>

		Vegetation Management (by Resident) to advise affected residents of pending works.
Louise Taylor	<p>Objects to the use of Glyphosate.</p> <p>How much glyphosate has been used per annum since 2016?</p> <p>Objects to the \$500 fee</p> <p>Does Council use glyphosate in townships?</p>	<p>COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p> <p>Council has utilised approximately 720 litres of concentrate glyphosate per annum for the last 3 years – this is to combat all weed species on road verges, council reserves and surrounding council infrastructure, as well as for cut and paint or drill and fill weed control of woody weeds such as camphor laurel, privets or other woody weeds</p>
Joy Van Son	<p>agrees with the intent to develop a register and believes the road side management has improved</p> <p>Burden of the \$500 fee</p> <p>Notification of what is being sprayed</p>	<p>COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works..</p>
Todd Vercoe	<p>Burden of the \$500 fee</p> <p>Wants increase of mechanical control</p>	<p>COMMENT NOTED: an alternate is being proposed for the fee, mechanical treatment is subject to budgets. Council will create and utilise a group Email Distribution List from the email addresses provided in the Applications for Roadside Vegetation Management (by Resident) to advise affected residents of pending works.</p>