

Pesticide Notification Plan

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countryenergy

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FOR COMMUNITY CONSULTATION

FOR PUBLIC RELEASE

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1 INTRODUCTION

This pesticide use notification plan has been prepared in accordance with the requirements of the Pesticides Regulation 1995 (the Regulation).

The plan allows members of the community to take action to avoid contact with pesticides, if they wish. Country Energy ensures that pesticides are applied to public places in a safe, responsible manner, minimising harm to the community or the environment.

The plan sets out, in respect of accessible public places, how Country Energy and/or its contractors will notify members of the community of pesticide applications and also, where notification of certain applications will not be made by Country Energy.

The plan describes:

- What public places are covered by the plan
- Who regularly uses these public places and an estimate of the level of use by such persons
- How and when Country Energy will provide the community with information about its pesticide applications in public places (i.e. what notification arrangements will be used)
- How the community can access this plan and get more information about Country Energy's notification arrangements
- How future reviews of the plan will be conducted
- Contact details for anyone wishing to discuss this plan with Country Energy
- Situations where Country Energy will be using pesticides in public places and will not be notifying the public.

Country Energy owns and operates one of the world's largest electricity supply networks, with 198,000 kilometres of powerlines, and 1.4 million power poles across ninety five percent of New South Wales.

Extensive gas and water networks comprising 1000 kilometres of gas mains and 577 kilometres of water and sewerage mains servicing 10,000 customers in far west New South Wales are also owned and operated by Country Energy.

Created in July 2001, Country Energy (refer figure 1) now has over 3,600 employees and supports more than 1,500 country and coastal towns and communities, from Bega to Tweed Heads, west to Broken Hill and south to the River Murray.

Country Energy is one of the largest electricity retailers in Australia, with more than 840,000 customers in five states and territories, and a product range that includes water, sewerage, natural and bottled gas, internet services and energy advice.

Figure 1 - CE Map



The majority of pesticide use by, or on behalf of, Country Energy consists of applying, by hand, solid fungicides during timber pole inspections, selective and non-selective herbicides (preference is given to use of selective herbicides where applicable) for weed control and occasionally for vegetation regrowth control, and applying insecticides by hand to manage certain insect pests, such as termites. Bait, powder and liquid insecticides are used for termite control to protect timber structures and as a consequence, public and employee safety, whenever this is considered an effective solution.

Country Energy also uses moderate quantities of some pesticides that are widely available in retail outlets and ordinarily used for domestic purposes, including home gardening. These include herbicides (such as Roundup), aerosol insecticides for wasps, ants, spiders, cockroaches, etc, and rodenticide baits for mice and rats.

The frequency of programmed pesticide applications depends upon seasonal growth conditions. Typically, the frequency ranges from a one to a four year cycle for pole inspection and treatment, and noxious weed and vegetation regrowth control. Other applications are on an as-needed basis.

Further information on Country Energy's pesticide use can be obtained by calling Country Energy's Call Centre on 132356 or by visiting the website www.countryenergy.com.au.

2 WHY THIS PLAN IS IMPORTANT

The aim of this plan is to address the community's general right to know about pesticide applications made to public places that are wholly or partly owned or controlled by Country Energy.

FOR PUBLIC RELEASE**3 PUBLIC PLACES COVERED BY THIS PLAN**

Country Energy proposes to use or allow the use of pesticides in the following categories of outdoor public places within Country Energy's area wherever Country Energy's assets of Electricity, Water, Sewer or Gas are situated:

- Parks and public gardens
- Playgrounds
- Schools and TAFE facilities
- Picnic areas
- Sporting fields and ovals
- Road verges, reserves, Laneways and pathways
- Easements accessible to the public (including National Parks, State Forests and on Crown Lands)
- Golf courses.

Information will not be provided to the community for pesticide use in the interiors of Country Energy buildings, for example:

- Offices
- Field service centres
- Zone Substations.

Country Energy's estimate of the level of community use, and regular user groups for each of these public place categories is summarised in table 1. Although not required by the Regulation, a summary of the type of pesticide use in each category of public place is also provided.

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Table 1 - Public places covered by this plan

Public Places used or controlled by Country Energy	Regular user Groups	Level of public use	Type of Pesticide use
Public Parks & Gardens	Children, Adults, Elderly, Workers	High	<ul style="list-style-type: none"> • Timber pole treatment – hand application of: <ul style="list-style-type: none"> ○ solid or paste fungicide ○ solid bait termiticide ○ liquid residual termiticide ○ Liquid Fungicide ○ dust termiticide. • Vegetation control: <ul style="list-style-type: none"> ○ spot or spray application by hand of selective or non-selective herbicide to vegetation ○ cut stump or stem injection ○ spot application by hand of selective or non-selective herbicide to cut stumps or tree stems. • Hand application of aerosol insecticide spray to pole top equipment and inside locked substation cabinets • Timber pole treatment – hand application of: <ul style="list-style-type: none"> ○ solid or paste fungicide ○ solid bait termiticide ○ liquid residual termiticide ○ Liquid Fungicide ○ dust termiticide. • Vegetation control: <ul style="list-style-type: none"> ○ spot or spray application by hand of selective or non-selective herbicide to vegetation ○ cut stump and or stem injection ○ spot application by hand of selective or non-selective herbicide to cut stumps or tree stems. • Hand application of aerosol insecticide spray to pole top equipment and inside locked substation cabinets.
Playgrounds	Children, Adults, Elderly, Workers	High	
Picnic Areas	Children, Adults, Elderly, Workers	High	

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Public Places used or controlled by Country Energy	Regular user Groups	Level of public use	Type of Pesticide use
Sporting Fields, Ovals & golf courses	Sporting Clubs, School Groups, General recreation, golfers, visitors, Workers	High	
Road verges, reserves, footpaths, laneways & pathways	Local residents, Visitors	Medium	
Easements accessible to the public (including National Parks or other lands reserved under the National Parks and Wildlife Act, State forests or Crown lands)	Local residents, Visitors, Workers	Medium to Low	
Schools & TAFE's (excluding building interiors)	Students, workers, visitors	High	
Interiors of certain Country Energy Buildings & FSCs	General public, Contractors	Low	<ul style="list-style-type: none"> • Hand application of aerosol insecticide spray to floors, walls, cupboards, etc. • Hand application of solid rodenticide baits

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4 NOTIFICATION ARRANGEMENTS

This section of the plan describes how and when Country Energy will provide notice of pesticide use in public places.

These notification arrangements are based on Country Energy's assessment of:

- The level of usage of public places where pesticides may be used
- The extent to which members of the public who are most likely to be sensitive to pesticides (e.g. young children, sick, pregnant and elderly people) and are likely to use these areas regularly
- The extent to which activities generally undertaken in these areas could lead to some direct contact with pesticides
- Types of pesticide used:
 - o where, how and in what quantities they are applied
 - o where they reside once applied.
- The resulting accessibility and contact risk to the public.

Notice of pesticide use will be provided by the following:

- The erection or placement of signs at the time of application, and or
- Information on Country Energy's website www.countryenergy.com.au/pesticide

Table 2 sets out the notification arrangements for Country Energy's pesticide applications.

Note: In public areas where multiple agencies have responsibility for land management (in this case pesticide application), and where there are no physical or visible boundaries, the agency undertaking the pesticide application will follow their own Pesticide Notification Plan. This will include any incidental pesticide applications in areas that are controlled by other agencies.

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Table 2 – Type of Pesticide Use

Prescribed Public Place	Type of Pesticide Use									
	1 Timber pole treatment – hand application of solid or paste fungicide inside pole & around pole base, beneath the soil	2 Timber pole treatment – hand painted application of liquid fungicide to treat damaged areas of CCA treated poles	3 Timber pole treatment – hand application of liquid residual termiticide to soil immediately around pole base	4 Timber pole treatment – hand application of solid bait termiticide inside protective cover mounted on pole	5 Timber pole treatment – hand application of dust termiticide inside pole or inside termite gallery on the pole	6 Vegetation control – spot or spray application by hand of selective or non-selective herbicide to vegetation	7 Vegetation cut stump and or stem injection - spot application by hand of selective or non-selective herbicide to cut stumps or tree stems	8 Hand application of aerosol insecticide spray to pole top equipment and inside locked substation cabinets	9 Hand application of aerosol insecticide spray to floors, walls, cupboards, etc	10. Hand application of solid rodenticide baits
Public Parks & Gardens	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A
Playgrounds	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A
Picnic Areas	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A
Sporting Fields, Ovals & golf courses	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A
Road verges, reserves, footpaths, laneways & pathways	⊙	⊙	⊙	⊙	⊙	■	⊙	⊙	N/A	N/A
Easements accessible to the public (including National Parks etc, State forests or Crown lands)	⊙	⊙	⊙	⊙	⊙	■	⊙	⊙	N/A	N/A
Schools & TAFE's (excluding building interiors)	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A
Interiors of certain Country Energy Buildings & FSCs	N/A	N/A	N/A	N/A	N/A	⊙	⊙	⊙	⊙	⊙
Within or adjacent to Sensitive Places	⊙	⊙	■	⊙	■	■	■	⊙	N/A	N/A

■ - Notice by display of signage during the pesticide application.

⊙ - No specific notice will be given

N/A – Not applicable

Note that information on the types of pesticide use and relevant pesticides will be provided on Country Energy's website.

FOR PUBLIC RELEASE**Emergency pesticide applications**

In cases where emergency pesticide applications in public places are required to deal with biting or dangerous pests such as wasps, bees, venomous spiders, fleas, bird mites or rodents (that pose an immediate health hazard), Country Energy will, where possible, provide notice by posting signs nearby at the time of the application. If this is not possible, Country Energy will provide information by public request to the person applying the pesticide.

Pesticide contractors and lessees of public places

Where Country Energy uses contractors to apply pesticides on its behalf, Country Energy will ensure that notification is made in accordance with the notification requirements of this plan.

Where persons or organisations hold an existing lease on Country Energy land that remains a public place and if they use pesticides in this area, Country Energy will still require notification in accordance with the requirements of this plan.

When notification will not be provided

Other than information provided on Country Energy's website and unless stated otherwise elsewhere in this plan, Country Energy does not intend to provide site-specific notice for the following pesticide applications:

- Timber pole treatment – hand application of solid or paste fungicide inside the pole and around the pole base, beneath the soil
- Timber pole treatment – hand painted application of liquid fungicide to treat damaged areas of CCA treated poles
- Timber pole treatment - hand application of liquid residual termiticide by hand to soil immediately around pole base (in non sensitive areas not readily accessible to the public)
- Timber pole treatment – hand application of solid bait termiticide inside a protective cover mounted on the pole
- Timber pole treatment - hand application of dust termiticide by hand inside pole or inside termite gallery on the pole (in non sensitive areas not readily accessible to the public)
- Vegetation control - cut stump and or stem injection - spot application by hand of selective or non-selective herbicide to cut stumps or tree stems
- Hand application of aerosol insecticide spray to pole top equipment and inside locked substation cabinets
- Hand application of aerosol insecticide spray to floors, walls, cupboards, etc
- Hand application of solid rodenticide baits.

As a rule, the amount of pesticides used for each treatment of a Country Energy timber power pole is small. All pesticides are applied by competent trained employees or contractors who are qualified in accordance with the Pesticides Regulation 1995. All timber pole treatments are recorded in Country Energy's asset management system and information about individual treatments can be accessed if required.

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In the application of the following pesticide methods the opportunity for contact with the general public is negligible – there are no significant fumes, vapours, mists or spray drifts and the pesticides are not reasonably accessible following application:

- Application of solid and/or paste fungicide occurs either within the pole itself and/or around the pole base beneath the soil. The solid fungicides are either small rods (about the size, shape and consistency of a big piece of blackboard chalk) placed inside holes drilled into the timber poles (the holes are plugged afterwards) or small pellets of the same material contained inside a plastic bubble wrap bandage that is wrapped around the base of the pole below ground level. The pesticide uses naturally occurring minerals salts to control rot in the timber. The paste is injected into any holes in the timber and is also wrapped on a bandage around the pole base, all below ground level.
- Application of liquid fungicide paint to damaged CCA poles occurs by hand paint brush and typically uses several teaspoons of paint to scarred areas of a timber pole beneath the damaged CCA treated sapwood. This is done to repair mechanical damage from car accidents and the like. The paint is absorbed into the timber fibres and dries quickly
- Application by hand of liquid residual termiticide by hand to soil immediately around pole base (in non sensitive areas not readily accessible to the public)
- Application of solid bait termiticide is done by hand and involves placing two sealed plastic bags of termiticide inside a protective container secured and sealed to the timber pole. The container cover is secured using tamper-resistant fixings and is sealed against weather ingress. The termiticide is classed as a non-toxic substance to people according to the criteria of WorkSafe Australia and the product's Material Safety Data Sheet
- Application by hand of dust termiticide by hand inside pole or inside termite gallery on the pole (in non sensitive areas not readily accessible to the public)
- Application by hand of aerosol insecticides occurs on pole top equipment or inside the locked cabinets of ground level substations to remove insect pests such as wasps, spiders or ants that could potentially pose a threat to employees or contractors who need to work on the equipment, or possibly to members of the public in the vicinity of the equipment. These insecticides are those typically available to the general public and are applied to a much localised area with no general access to the public
- Application by hand of aerosol insecticides spray and rodenticide baits inside Country Energy buildings and Depots is typically done outside of business hours to reduce potential risks to employees or to the public (in those limited areas accessible to the public).

Spot weed control or cut stump applications inside Country Energy FSCs is done by hand using domestically available pesticides and typically occurs in areas not accessible to the public.

FOR PUBLIC RELEASE**5 WHAT INFORMATION WILL BE PROVIDED**

In accordance with clause 11L (2) (g) of the Pesticides Regulation, notices of pesticide use must include all the following information:

- the full product name of the pesticide to be used;
- the purpose of the application;
- the proposed date/s or date range of the pesticide application;
- the place where the pesticide is to be used;
- contact telephone number and email address of the appropriately nominated Country Energy officer who people can contact to discuss the notice;
- any warnings regarding re-entry to or use of the place of application specified on the product label or the Australian Pesticides and Veterinary Medicines Authority (APVMA) permit.

Signs will be easily recognisable to the public and workers.

As already noted, Country Energy's website will have a dedicated area that describes its programmed, reactive and, if practicable, emergency pesticide use in public places with a link to this notification plan. The relevant website address will be publicised.

6 HOW WILL THE COMMUNITY BE INFORMED OF THIS PLAN

Country Energy will advise the public of the plan, or any future revisions of the plan, by:

- Making a copy of the plan available for public viewing free of charge, during office hours, in Country Energy's Regional Offices. Phone Country Energy's call centre on 132356 to find the nearest Regional Office (shown on map Fig 1).
- Placing a copy of the plan on the Country Energy website at:
www.countrenergy.com.au/pesticide
- Placing a notice in:
 - o The NSW Government Gazette (on final publication of the document)
 - o Newspapers: The Australian and The Land.

Comments on the plan or any future revisions of the plan (five years from publication date), will be received and considered for a period of four weeks after the placement of the notice in The Australian and The Land newspapers. This notice signifies the start of the community consultation period. Only comments written or emailed via the contact details listed below, submitted via the Country Energy website www.countrenergy.com.au or as otherwise specified in the newspaper notice, can be considered.

7 CONTACT DETAILS

Anyone wishing to contact Country Energy to discuss the notification plan or to obtain details of specific details of pesticide applications in public places should contact:

Brian Davidson
 Manager Safety, Environment, Policy and Compliance
 PO Box 718
 Queanbeyan NSW 2620

Phone (02) 6773 4763
 Fax (02) 6773 4780

Or access the website: www.countrenergy.com.au

8 KEY TERMS AND DEFINITIONS

In this document the following terms have the meanings, as listed below:

CCA: copper chromium arsenic is a preservative used to protect timber in service from all major biodeteriogens, including decay fungi, wood boring insects, termites, and marine borers.

Cut stump treatment: Hand cutting of target vegetation followed by hand application of herbicide to stump.

FSC: a Country Energy Field Service Centre, a Depot.

Fungicide: These control, destroy, render ineffective or regulate the effect of a fungus; for example, fungicides are used to treat grey mould on grape vines and fruit trees.

Herbicide: These destroy, suppress or prevent the spread of a weed or other unwanted vegetation; for example, the herbicide glyphosate (e.g. Roundup) is used to control a range of weeds in home gardens, bushland and agricultural situations.

Insecticide: These destroy, suppress, stupefy, inhibit the feeding of, or prevent infestations or attacks by, an insect. Insecticides are used to control a wide variety of insect pests, including thrips, aphids, moths, fruit flies and locusts. In NSW, pesticides include products such as flea powders and liquids used externally on animals. Injections or other medicines administered internally to treat animals are veterinary medicines and are excluded.

Pesticide: is a generic reference and it includes herbicides, insecticides, fungicides, termiticides and rodenticides.

Rodenticide: Pesticide used in the control or eradication of rodents such as mice and rats.

Stem injection: is the application of herbicide to growing saplings and trees where the plant is left to stand and die in its growing position. Only those plants that are to be prevented from growing are treated.

Termiticide: Insecticide used to control termites.

9 REFERENCES

CEPG8008 - Vegetation Management Plan

Pesticides Regulation 2009

10 REVISIONS

Revision Number	Section	Details of Changes in this Revision
2	Various	Document number was CEPG2299, Approver details updated.