

Memorandum

14/01/2019

To: Ōtara-Papatoetoe Local Board

Subject: Weed Management

From: Jenny Gargiulo
Principal Environmental Specialist

Purpose

1. Inform the Ōtara-Papatoetoe Local Board on how products are considered for use within the Community Facilities maintenance contracts.

Summary

- *MetroCare presented on their Hot Foam herbicide for weed management in public places to the Local Board.*
- *Community Facilities redirects all companies that approach Auckland Council with new products to our full facility contractors. For any herbicide to be considered for use on public land, the full facility contractors must confirm that the product will enable them to meet the contract specifications, be compliant with all Auckland Unitary Plan Rules and have approval from the Environmental Protection Agency.*

Context/Background

2. Auckland is one of the weediest cities in the world. Our warm and wet climate makes us particularly vulnerable to weeds. Weed management is a statutory requirement for multiple departments in Auckland Council, with activities ranging from vegetation management (including grass edging), to pest plant control and ecological restoration.
3. The council uses different weed control methods depending on the species, site characteristics, infestation level and wider landscape characteristics for our open spaces. This includes manual control, biological control, hot water, agrichemical and steam. (Attachment One).
4. Options for weed management completed by the council take the eight objectives of the Weed Management Policy 2013 into consideration. For the use of herbicide, the council follows the guidance of the Environmental Protection Agency which grants approvals and conditions for weed control products.
5. On 11 December 2018, the Ōtara-Papatoetoe Local Board received a presentation from MetroCare on their Hot Foam herbicide (Attachment Two). Hot Foam combines hot water with a solution to create a foam. When applied to weeds and unwanted vegetative growth, the foam breaks down the cellular structure of the plant leading to destruction and dehydration. The foam also has an insulating effect, so the heat stays on the leaf for longer.

Discussion

6. The council's full facilities suppliers, Ventia, AIM Services, City Care and UMS, are responsible for vegetation control within our local parks. From April 2019, they will also be managing weeds on berms and the road corridor. There is a council-wide operational requirement to record and monitor herbicide usage.

7. Community Facilities redirects all companies that approach Auckland Council with new products to our full facility contractors. For any herbicide to be considered for use on public land, the full facility contractors must confirm that the product will enable them to meet the contract specifications, be compliant with all Auckland Unitary Plan Rules and have approval from the Environmental Protection Agency.

Next steps/implementation

8. If a product can meet the efficacy and environment requirements of our contract specifications and the Auckland Unitary Plan rules, as well as product approval from the Environmental Protection Agency, Hot Foam would be considered for use within the contracts.

Attachments

- Attachment A – Weed control methodology table
- Attachment B – MetroCare Presentation

Comparison of weed control methodologies

Method	Effectiveness	Environmental Impacts	Human health risks
<p>No control</p> <p>Where no weed control is undertaken at a particular site.</p>	<p>In most situations, no control would result in council's failure to meet current level of service.</p> <p>No control can be effective in some parts of the rural road corridor for some species. For example, no control of gorse can lead to successful regeneration of native species¹.</p> <p>In a few other situations where erosion control is more important than species composition, no control of weeds is an effective option².</p>	<p>In some cases native species may co-exist with weed species if the weed populations do not dominate to the point of excluding native species suited to the particular habitat. More commonly weeds do out-compete and therefore eliminate native plant populations³.</p>	<p>Perceived or actual indirect impact from the growth of weeds:</p> <ul style="list-style-type: none"> • Species like privet can trigger hay fever and asthma. ⁴ • Other species can present a physical hazard (e.g. moth plant sap is an irritant)⁵.
<p>Mechanical</p> <p>Weed-eating, mowing, smedding.</p>	<p>Mechanical control methods are not effective ways of killing the entire plant including the root system, but they trim foliage and can prevent or reduce seed production and restrict growth. Mechanical control is used most often in combination with other weed control methods in the road corridor (glyphosate, steam and hot water) to increase effectiveness.</p> <p>Mechanical control methods must be undertaken between weekly and monthly, depending on the required level of service, to prevent weeds from resprouting from stem and root fragments.</p> <p>Mechanical control is most effective when it is timed well, e.g. before a plant can set seeds⁶.</p>	<p>Some potential impact on biodiversity, via risk of spreading weeds as fragments can travel on machinery, or re-sprout from fragments on site.⁷</p> <p>The equipment used for mechanical control may use some fuel. Fuel consumption and associated carbon emissions have not been quantified.</p>	<p>There is a minor risk of injury to the applicator from equipment, or to passers-by (e.g. from stones being flicked up by machinery/line trimmers).</p>
<p>Manual</p> <p>Weed control by hand or hand tool.</p>	<p>Manual control is not an effective method for most of the hard edges in local parks, nor for much of the road corridor. It can be effective against small shrubs and trees and herbaceous weeds in small infestations, removing the whole plant⁸. It is best suited to small plants without extensive root systems that can be removed without breakage. It is not recommended for plants with deep underground roots and/or easily broken roots.⁹</p> <p>Most weeds should be removed from the site entirely to avoid fragments or seed colonising.¹⁰ Careful disposal is important for some species (e.g. those that resprout from fragments, such as tradescantia)¹¹.</p>	<p>This method creates soil disturbance, which can lead to weed invasion¹². Manual control on species that re-sprout from fragments can lead to weeds spreading further.¹³</p>	<p>There is risk to the applicator through injury via over-exertion during operation or injury/illness caused by weed itself (e.g. reaction to sap, or injury from appendages such as thorns). Personal Protective Equipment (PPE), such as long sleeves, pants and gloves, will minimise risk¹⁴.</p>

High Pressure Steam

Application of high pressure steam. Includes supplementary applications of glyphosate or mechanical treatment.

Used in approximately 700km (9%) of the road corridor in north-east urban contract area of legacy North Shore¹⁵. To achieve required level of service in this contract area, mechanical control (weed eaters) is used to remove any weeds in the channel or growing over the kerb before high pressure steam is applied to the remainder of the plant. High pressure steam is used every second cycle with the intervening cycle being mechanical only. Weed eaters are also used to trim the edges of the footpath. Glyphosate-based herbicide is used to kill the weeds in the channel on the Level 2 roads as the high pressure steam system (trucks and application system) cannot be used safely on these roads, with mechanical control (weed eaters) used on the road berm. Glyphosate is also used to treat specific weeds such as nut grass.

The current high pressure steam system is too heavy to be accommodated on park infrastructure such as footpaths and lawns, and is only used in the road corridor. Application involves large, slow moving vehicles which are noisy¹⁸, so it is limited to non-peak hours in some areas. Traffic management is required for high volume roads (L2).

This method uses 2000L to 3000L of water per day of deployment²⁰. The environmental impacts of this water consumption will be dictated by whether the water is sourced from the mains supply or from roof supply, and has not been quantified.

Similarly the environmental costs from heating the water and powering the vehicles used for transporting the heated water to the site, will depend on the sources of the energy being consumed. If fossil fuels are used there will be associated carbon emissions. These have not been quantified.

Primarily risk to the operator through direct contact with hot water, equipment and proximity to traffic.

Exposure to the steam is minimal and the heat dissipates quickly once the steam contacts the weeds or ground. Risks caused by exhaust have also potential to cause harm²¹.

In the road corridor the treatment operator is exposed to moving traffic as they walk alongside the truck. This is minimised by treating the kerb and channel from the berm/footpath.

Hot water treatment

Application of hot water. Supplemented with mechanical removal of larger weeds.

Used in approximately 735km (9%) of road corridor in north-west urban contract area of legacy North Shore²².

Hot water treatment is not an effective way of killing the entire plant including the root system, but it treats the foliage and can prevent/reduce seed production and restrict growth²³. The hot water destroys the surface foliage of the weeds, leaving the roots primarily untreated as the temperature of the water decreases rapidly upon touching the ground.

Hot water does not destroy the foliage of some types of weeds (nutgrass and kikuyu for example).

In this contract area, hot water is applied directly to the weed with no mechanical control undertaken prior to application of the hot water. Some glyphosate is used in the area where hot water is used.

Control is repeated within an 8 weekly programmed cycle in combination with mechanical trimming/removal. This cycle is not frequent enough to achieve the required level of service²⁴.

The current hot water treatment system (trucks and disposal unit) is too heavy to be accommodated on park infrastructure such as footpaths and lawns, and can only be used in the road corridor. Application involves large, slow moving vehicles which are noisy²⁵, so it is limited to non-peak hours in some areas. Traffic management is required for high volume roads (L2).

This method uses 5000L to 6000L of water per day of deployments²⁶. The environmental impacts of this water consumption will be dictated by whether the water is sourced from the mains supply or from roof supply, and has not been quantified.

Similarly the environmental costs from heating the water and powering the vehicles used for transporting the heated water to the site, will depend on the sources of the energy being consumed. If fossil fuels are used there will be associated carbon emissions. These have not been quantified.

Primarily risk to the operator through direct contact with hot water, equipment and proximity to traffic.

Exposure to the hot water is minimal and the heat dissipates quickly once it contacts the weeds or ground. Risks caused by exhaust have also potential to cause harm²⁶.

In the road corridor, the treatment operator is at risk to moving traffic as they walk beside the truck on the road.

Plant-based herbicide

Weed control by plant-based herbicide via foliar spray. Includes products like Organic Interceptor (derived from pine essence²⁸) and Agpro Bio-safe (derived from coconut oil²⁹).

Used in approximately 1049 km (13%) of road corridor in legacy Auckland City and Waiheke Island area³¹.

The vehicles used to apply plant-based herbicides use fossil fuels and generate some carbon emissions. There is concern that some plant-based herbicides contain ingredients that contribute to other environmental effects such as coconut oil. Some of these products are acidic and can be corrosive. These have not been quantified.

Direct application of Organic Interceptor may kill beneficial insects and bacteria³².

Bio-Safe is inactivated on contact with the soil and has no residual activity³³.

Organic Interceptor is a non-selective contact herbicide that causes rapid denaturation by penetrating green tissue and disrupting normal membrane permeability and cell physiology³⁴.

Bio-Safe is a non-selective contact herbicide that causes rapid wilting of the leaves and is most effective on actively growing weeds and when applied in hot sunny conditions³⁵.

To meet service standards they must also be used in combination with other methods, and they require more frequent application compared to glyphosate³⁶. Biosafe is used on a 4 weekly cycle and is supplemented with mechanical removal.

A 2002 trial into weed control methods by the legacy Waitakere City Council found that Bio-safe was reliably effective only when vegetation is young especially kikuyu grass. The same trial looked at Organic Interceptor and glyphosate, and found it the least effective in the trial at controlling established vegetation especially kikuyu.³⁷

Glyphosate-based herbicide

Application of approved herbicide through roller ball or foliar spray.

In approximately 5500km (89%) of the road corridor⁴¹.

Effective tool for controlling annual broadleaf weeds, grasses and other monocots affecting hard edges in local parks and found in the road corridor. It kills the entire plant including its root system⁴². It requires less frequent follow ups than other methods, with an average of three to four treatments a year.

Glyphosate is absorbed through green plant tissue then translocates throughout the plant including the root system to kill the entire plant⁴³. Effectiveness requires weeds to be actively growing and not under drought stress, with clean foliage for best results.⁴⁴ Effectiveness is also enhanced when sites are prepared using mechanical weed control methods that reduce or prevent seed production.

Nutgrass suffers only a knock-down effect from glyphosate due to the inability of glyphosate to penetrate the plant's thick cuticle. However experience shows that when mixed with a wetting agent, glyphosate is effective in killing nutgrass⁴⁵.

The application rate is quick (using a small left-hand steer vehicle).

Approved for use the New Zealand Environmental Protection Agency (EPA).

Glyphosate is strongly absorbed into soil and has no residual activity in irrigation, and the risk of the product being transferred due to rain or plants⁴⁷. It has a low toxicity to terrestrial animals and wildlife⁴⁸.

Over use can result in increased resistance in some species, and therefore effectiveness could decline over time⁴⁹.

The vehicles used to apply glyphosate use fossil fuels and generate some carbon emissions. These have not been quantified. Similarly the life cycle impacts arising from the manufacture, transport and storage of glyphosate have not been quantified.

Exposure pathways for occupational and public exposure are managed by compliance with standards and procedures.

Meets national health standards when correct application methods and procedures are adhered to. The EPA has approved Organic Interceptor and Agpro Bio-safe as a herbicide for use under the Hazardous Substances and New Organisms Act (HSNO) Act 1996.

Correct application methods are described in the New Zealand Standard on the Management of Agrichemicals (NZS 8409:2004), Proposed Auckland Unitary Plan (part 3.H.4.9.2.2 and .3), and product label as registered by the EPA. Application must be in accordance with these standards.

Agpro Bio-safe carries a health and safety risk to the operators and others who come into contact with the product. The product is corrosive to eye tissue and an eye, skin and respiratory irritant. Protective equipment must be worn⁴⁶.

Biosafe is a coconut derived fatty acid with a strong, notable odour. This odour persists for some time after treatment, longer on warm days, and has been the source of complaint from the public.

Exposure pathways for occupational and public exposure are managed by compliance with standards and procedures.

Meets national health standards when correct application methods and procedures are adhered to. The EPA has approved glyphosate as a herbicide for general use under the Hazardous Substances and New Organisms Act (HSNO) Act 1996.

Correct application methods are described in the New Zealand Standard on the Management of Agrichemicals (NZS 8409:2004), Proposed Auckland Unitary Plan (part 3.H.4.9.2.2 and .3), and product label as registered by the EPA. Application must be in accordance with these standards.

There is some community and international expert debate of health risk. In March 2015 a World Health Organisation (WHO) sub group, the International Agency for Research on Cancer (IARC) Working Group, re-classified glyphosate as 'probably carcinogenic to humans (category 2A)'⁵⁰ However, the EPA has noted that another WHO assessment group, the Joint Meeting on Pesticide Residues, has determined that glyphosate does not pose a cancer risk to humans⁵¹.

There is also some community concern associated with use of glyphosate on crops and entry into food chain however these potential entry points do not occur in the road corridor and hard edges of local parks. There is little evidence of this risk in NZ and appears to be associated with crops that are genetically modified to be resistant to glyphosate - this means such crops remain unaffected when glyphosate has been applied. This potential exposure pathway is not relevant in NZ as no genetically modified crops are grown commercially in NZ⁵².

The EPA notes that the current opinion of relevant US, Canada, EU and Australian government authorities is that glyphosate is safe to be used as a herbicide. The EPA actively monitors the status of glyphosate and international developments. If needed it may initiate a reassessment after

Biocontrol agents rarely pose any risks to humans due to the stringent, precautionary assessment and registration process.

The risk of adverse impacts to the environment is low. Before a new biological control agent is released, approval from the EPA is needed and all proposed agents are rigorously tested to assess the risk of damage to non-target plants. They are also tested for disease and evaluated for any other unwanted interactions it might have. A comprehensive cost-benefit analysis is also carried out and the results of all these studies are included in an application to the EPA. The application then goes through a public comment period.⁵⁵

All species approved for release must initially come into a containment facility until permission to remove them is granted by MPI pending evidence of their correct identity and freedom from any diseases or other unwanted organisms.⁵⁵

Biocontrol is not suited to control weed species typically occurring on hard edges of local parks and many species in the road corridor⁵⁴.

If relies on the weed's natural enemy being free to grow, and in most areas this would contravene the weed control standards of local parks and roads. Biological control might mean that areas are not tidy and safe, or could cause a nuisance to neighbours or damage to fences.

Biological control

Used to control suited species in sites across the region including regional parks.

Not currently used in the road corridor.

¹ http://www.openspace.org.nz/Website/Managing_your_covenant/Restoration/Restoration_information/vegetating_gorse.aspx

² <http://www.doc.govt.nz/documents/science-and-technical/sap243entire.pdf>

³ Staff experience and in-field observations

⁴ https://www.landcareresearch.co.nz/_data/assets/pdf_file/0003/77691/P-nvet_Biosecurity_factsheet_8.pdf

⁵ https://www.landcareresearch.co.nz/_data/assets/pdf_file/0007/77911/Ecology_pest_status_moth_plant_Araujia_hortorum.pdf

⁶ Tu, Hurd & Randall, 2001. Weed Control Methods Handbook: Tools & Techniques for Use in Natural Areas.

⁷ Tu et al, 2001. Weed Control Methods Handbook: Tools & Techniques for Use in Natural Areas

⁸ <http://www.weedbusters.org.nz/weed-information/controlling-weeds/controlling-pest-herbs-ground-covers>

⁹ Tu et al, 2001. Weed Control Methods Handbook: Tools & Techniques for Use in Natural Areas

¹⁰ http://www.nzpcn.org.nz/page.aspx?conservation_habitat_protection_weed_control

¹¹ Auckland Regional Council Weed Control Manual 2008

¹² https://www.landcareresearch.co.nz/_data/assets/pdf_file/0018/39042/weed_management_handout.pdf.

¹³ Auckland Regional Council Weed Control Manual 2008

¹⁴ Tu et al, 2001. Weed Control Methods Handbook: Tools & Techniques for Use in Natural Areas

¹⁵ Distance provided by Auckland Transport

¹⁶ Staff experience and in-field observations

¹⁷ Staff experience and in-field observations

¹⁸ <http://www.regional.org.au/au/asa/1998/6/315hewitt.htm>

¹⁹ Auckland Transport and their contractors receive complaints from neighbours due to the high noise level during control work using this method – this has resulted in limited hours for operations in residential areas

²⁰ Staff experience and in-field observations

- 21 Diesel engine exhaust is a category 1 carcinogen (Carcinogenic to humans) and petrol engine exhaust is a category 2B carcinogen (Possibly carcinogenic to human); Agents Classified by the IARC Monographs, Volumes 1–112 and <http://monographs.iarc.fr/ENG/Classification>
- 22 Distance provided by Auckland Transport
- 23 Staff experience and in-field observations
- 24 B. De Cauwer et al. Efficacy and reduced fuel use for hot water weed control on pavements, *Weed Research*, 55(2), 195, 2015.
- 25 Auckland Transport and their contractors receive complaints from neighbours due to the high noise levels during control work using this method – this has resulted in limited hours for operations in residential areas
- 26 Staff experience and in-field observations
- 27 http://eap.mcgill.ca/MagRack/JPR/JPR_27.htm
- 28 Diesel engine exhaust is a category 1 carcinogen (Carcinogenic to humans) and petrol engine exhaust is a category 2B carcinogen (Possibly carcinogenic to human); Agents Classified by the IARC Monographs, Volumes 1–112 and <http://monographs.iarc.fr/ENG/Classification>
- 29 http://www.nzpps.org/journal/55/nzpp_552070.pdf
- 30 Agpro Bio-safe MSDS
- 31 Distance provided by Auckland Transport
- 32 http://www.nzpps.org/journal/52/nzpp_520010.pdf
- 33 <http://www.waikare.govt.nz/ebtcrl/ct/pdf/envrmttl/110602ag.pdf> p.51
- 34 New Zealand Novachem Agrichemical Manual, 2013
- 35 New Zealand Novachem Agrichemical Manual, 2013
- 36 http://www.nzpps.org/journal/58/nzpp_581570.pdf
- 37 <http://www.waikare.govt.nz/ebtcrl/ct/pdf/envrmttl/110602ag.pdf> p.47
- 38 New Zealand Novachem Agrichemical Manual, 2013
- 39 New Zealand Novachem Agrichemical Manual, 2013
- 40 Agpro Bio-safe MSDS
- 41 Distance provided by Auckland Transport
- 42 New Zealand Novachem Agrichemical Manual, 2013
- 43 New Zealand Novachem Agrichemical Manual, 2013
- 44 New Zealand Novachem Agrichemical Manual, 2013
- 45 Graeme Bourdot, AgResearch, Auckland Council Weed Management Workshop 18 June 2015.
- 46 New Zealand Novachem Agrichemical Manual 2013
- 47 Glyphosate 360 Material Safety Data Sheet (MSDS)
- 48 New Zealand Novachem Agrichemical Manual, 2013
- 49 <http://weedsceance.org/summary/resistbyactive.aspx>
- 50 IARC Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides
- 51 http://www.epa.gov/nz/hazardous-substances/pop_hs_topics/glyphosate_learn/Pages/Glyphosate_regulation.aspx
- 52 <http://www.foodsmart.govt.nz/whats-in-our-food/genetically-modified-food/overview/>
- 53 http://www.epa.gov/nz/hazardous-substances/pop_hs_topics/glyphosate_learn/Pages/Glyphosate_regulation.aspx
- 54 Staff experience and observations
- 55 <http://www.landcareresearch.co.nz/science/portfolios/managing-invasive/weeds/biocontrol/education/biocontrol-information/biocontrol-safety>
- 56 <http://www.landcareresearch.co.nz/science/plants-animals-fungi/plants/weeds/biocontrol/approvals>

Maintenance today, protecting tomorrow

MetroCare values our community. We care about the health of our environment and the people in it.

We provide an integrated approach to vegetation control and street cleaning.

Safe

No adverse health affects or chemical smell for the public or pets after MetroCare's natural Hot Foam treatment.

As we transition to a glyphosate-free future, cleaner, safer and more efficient weed management strategies are required.

Papatoetoe and Otara

Targeted

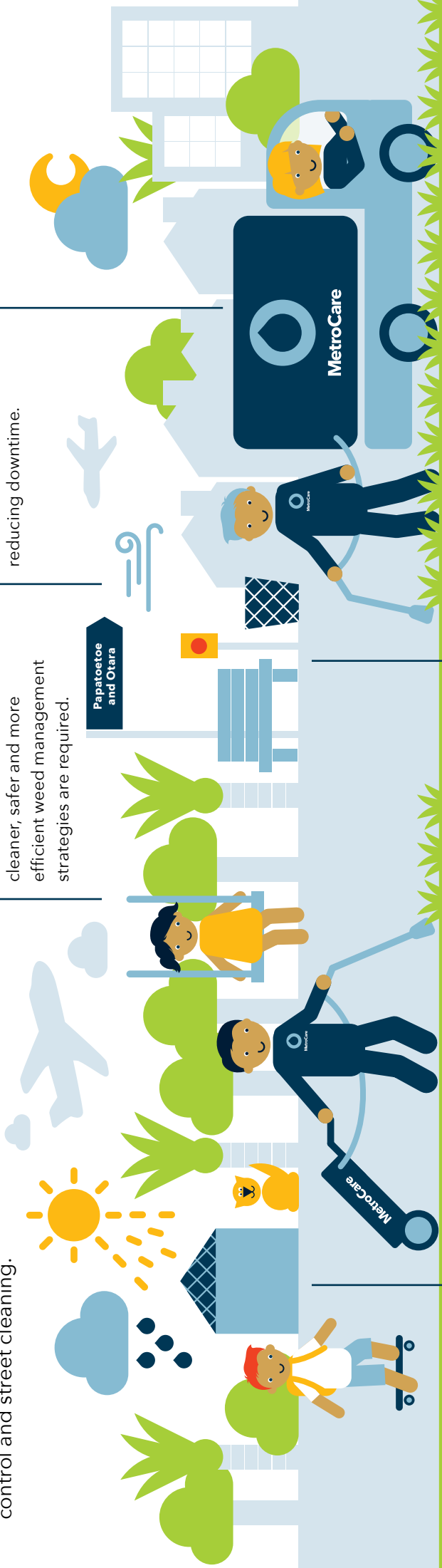
There is no residue, water run-off or airborne drift on windy days.

MetroCare's natural Hot Foam can be used in almost any weather conditions, reducing downtime.

Carbon zero

Our electric vehicles and heating system require no fossil fuels and operate in silence.

So quiet they can run at night in residential areas.



Community hubs

MetroCare have created the concept of Community Hubs to collect rainwater and harness solar energy to heat water and provide clean energy to power our fleet.

Local pride

MetroCare are part of the community. We employ local people who care about the work they do in their neighbourhood.

Integrated services

MetroCare's innovative technology allows for the integration of compatible services, like **weed control and street cleaning**. We work in partnership with clients to design and implement a plan to make the transition to a glyphosate-free future.





Toxic chemicals or natural hot foam



MetroCare

The imperative for change



Glyphosate

Carcinogenic Existing weed control chemicals are glyphosate-based, which has been acknowledged as a probable carcinogen for humans as well as animals.

If sprayed on or around edible gardens, there is a risk of residual glyphosate being ingested.

Toxic to animals Glyphosate has been shown to be dangerous to domestic animals. Common practice when using glyphosate spray is to notify home and pet owners of spray periods in order for them to take precautionary action - remove pets, change water frequently, etc.

Environmental Impact Glyphosate-based sprays should not be used in moderate to high winds or within 24 hours of rain, due to the potential impact on people and the surrounding environment.

As global citizens we all share a responsibility for environmental sustainability, and to reduce our individual and collective carbon footprint.

Organisations and Municipal Councils around the world are looking to the future - a future where innovation and new technologies provide opportunities for environmental leadership.

To achieve sustainability goals, it is realistic to expect the use of glyphosate for weed control on streets, parks and green spaces to be significantly reduced in coming years. And as a landmark case in California plays out, an association between glyphosate and cancer will be examined and may well lead to a ban on the use of glyphosate by many councils.

Residual effect Glyphosate binds strongly to soil and remains in the soil for a period of time, negatively impacting the ecosystem.

The future



MetroCare's Natural Hot Foam

As we transition to a glyphosate-free future, cleaner, safer and more efficient weed management strategies are required.

MetroCare is leading the journey to chemical-free weed management and maintenance with innovative solutions.

Natural Hot Foam combines hot water (minimum of 100°C) with natural plant sugars to create foam. When applied to weeds and unwanted vegetative growth, Hot Foam acts to break down the cellular structure of the plant, leading to destruction and dehydration. The foam has an insulating effect, so the heat stays on the leaf for longer, giving much better results than hot water alone.

MetroCare is working in partnership with local and city councils around the world to transition from glyphosate to chemical-free, environmentally friendly and sustainable weed control and hot water cleaning.



Chemical weed control

- Auckland region Local Government roadside and parks and reserves, NZ
- Auckland Transport Urban North West Road, NZ
- Hamilton City Council Roadside, NZ
- Transit New Zealand Auckland region motorways and state highways, NZ
- Auckland region noxious weed control on farmland, NZ
- Wellington City Council roadside, NZ

Non-chemical weed control

- Auckland region local government roadside, NZ
- North Shore City Council, NZ
- Auckland Transport Urban North West Road, NZ
- Leichhardt Municipal Council, Australia
- Ashfield Council, Australia
- Heemstede Council, Holland
- Ku-ring-gai Council, Australia
- Waverley Municipal Council, Australia

Project consultants

- City of Fremantle, Australia
- City of Hobart, Australia
- City of Banyule, Australia
- Greater Shepparton City Council, Australia
- City of New York - Parks and Reserves, USA
- Martha's Vineyard Golf Club, USA
- IAP - Hill Jacksonville Florida, USA
- City of Breda, Holland
- Villa Maria Winery, NZ

