

Consultation on the Revised Code of Practice for the Safe Use of Plant Protection Products in Scotland and on Public Access to Information on Pesticide Use.

The University of Glasgow welcomes the opportunity to comment on the revised Code of Practice and support the aim of continuing to improve the guidance given on the use of pesticides.

Responses to the questions listed in Annex 2:-

Should the requirement to keep records of pesticide use be made mandatory?

Yes. It is essential that records of the type of pesticide, quantities used and the dates of application are recorded. This information should be collated by the Scottish Executive. This would enable some analysis to be carried out of the quantities used in different locations and their ecological impact.

How should this information be disclosed to interested parties?

Direct disclosure of such information may be appropriate in respect of health issues. It is likely that others may wish to obtain information of a more general nature e.g. the amounts of pesticides used in certain areas of Scotland. This information could be supplied more easily from data collated by the Scottish Executive.

The proposal that users of pesticides be required to notify occupants of adjacent property prior to use of pesticides.

The proposal that there should be a statutory requirement for those undertaking spraying of pesticides to notify owners of neighbouring properties is welcomed.

In what form should the notification take place?

The posting of notices at locations in the vicinity of the proposed spraying operations would appear to be the most appropriate method. The size of the notice (and the text font used) should be such that it is readily legible.

The regulations relating to aerial spraying should be tightened. Given the possibility that aerial spraying may result in pesticides drifting some distance from the target area, the requirement to inform owners of land within 25 metres of the boundary of the land to be sprayed is inadequate. This should be extended to at least 100 metres.

The period before use when notification should be given.

The current requirement of 24 hours notice is adequate for most spraying operations. We believe that there is a case for this period of notice to be increased in the case of aerial spraying to at least 48 hours.