

Transgrid Pesticide Use Notification Plan

May 2020



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1. Introduction

Transgrid is the owner, operator and manager of the high voltage electricity transmission system throughout New South Wales (NSW), Australia. Transgrid became privately owned in 2015 (after the NSW Government granted NSW Electricity Networks Pty Ltd a 99-year lease over the NSW transmission network). Transgrid operates across the eastern half of NSW from Queensland to Victoria and the Snowy system to Broken Hill in the west, Transgrid recognises its responsibility to manage and protect the environment in which it operates.

We transmit electricity across NSW (refer to Figure 1) through approximately 12,000 kilometres of high voltage transmission lines supported by about 20,000 structures that are made from concrete, wood or steel, along what are commonly known as easements. Our high voltage electricity system also comprises over 90 substations and switching stations.

Transgrid's network is a major part of one of the most extensive transmission networks in the world - interconnected with the Victorian, South Australian and Queensland networks.

This pesticide use notification plan (PUNP) has been prepared in accordance with the requirements of the Pesticides Regulation 2009 (the Regulation).

The aim of this plan is to meet the community's general right to know about pesticide applications made by Transgrid to outdoor public places.

In this plan, the term 'pesticides' is a generic reference and it includes herbicides, insecticides, fungicides, termiticides and rodenticides. The definitions of which can be found in Section 7.

Transgrid ensures that when necessary, pesticides are applied to public places in a safe, responsible manner, minimising harm to the community or the environment. The PUNP sets out how and when Transgrid will give public notice of the proposed use of pesticides by Transgrid and/or its contractors in a prescribed public place or, to the extent that Transgrid is required to carry out its statutory functions in relation to such a place, controlled by Transgrid. Accordingly, the PUNP will allow members of the community to take action to avoid contact with pesticides, should they wish to do so.

The plan describes:

1. What public places are covered by the plan;
2. Who regularly uses these public places and an estimate of the level of use by such persons;
3. How and when Transgrid will notify affected persons of proposed pesticide applications in public places (i.e. what notification arrangements will be used);
4. How the community can access this plan and get more information about Transgrid's notification arrangements;
5. How future reviews of the plan will be conducted;
6. Contact details for anyone wishing to discuss this plan with Transgrid; and
7. Situations where Transgrid will be using pesticides in public places and will not be notifying the public.

Transgrid's pest management programs aim to apply best practice that will have minimal adverse impacts upon the environment. Transgrid, or our approved contractors, use pesticides when necessary to control pests, to protect public property from pest damage, and to protect the users of public places from nuisance or danger from pests or danger from damaged public property.

The majority of pesticide use by, or on behalf of Transgrid, consists of selective and non-selective herbicides (preference is given to use of selective herbicides where applicable) for vegetation regrowth control and occasionally for weed control, applying by hand, solid fungicides during timber pole inspections, and applying insecticides by hand to manage certain insect pests, such as termites. Transgrid does not carry out broad scale boom spraying of insecticides.

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

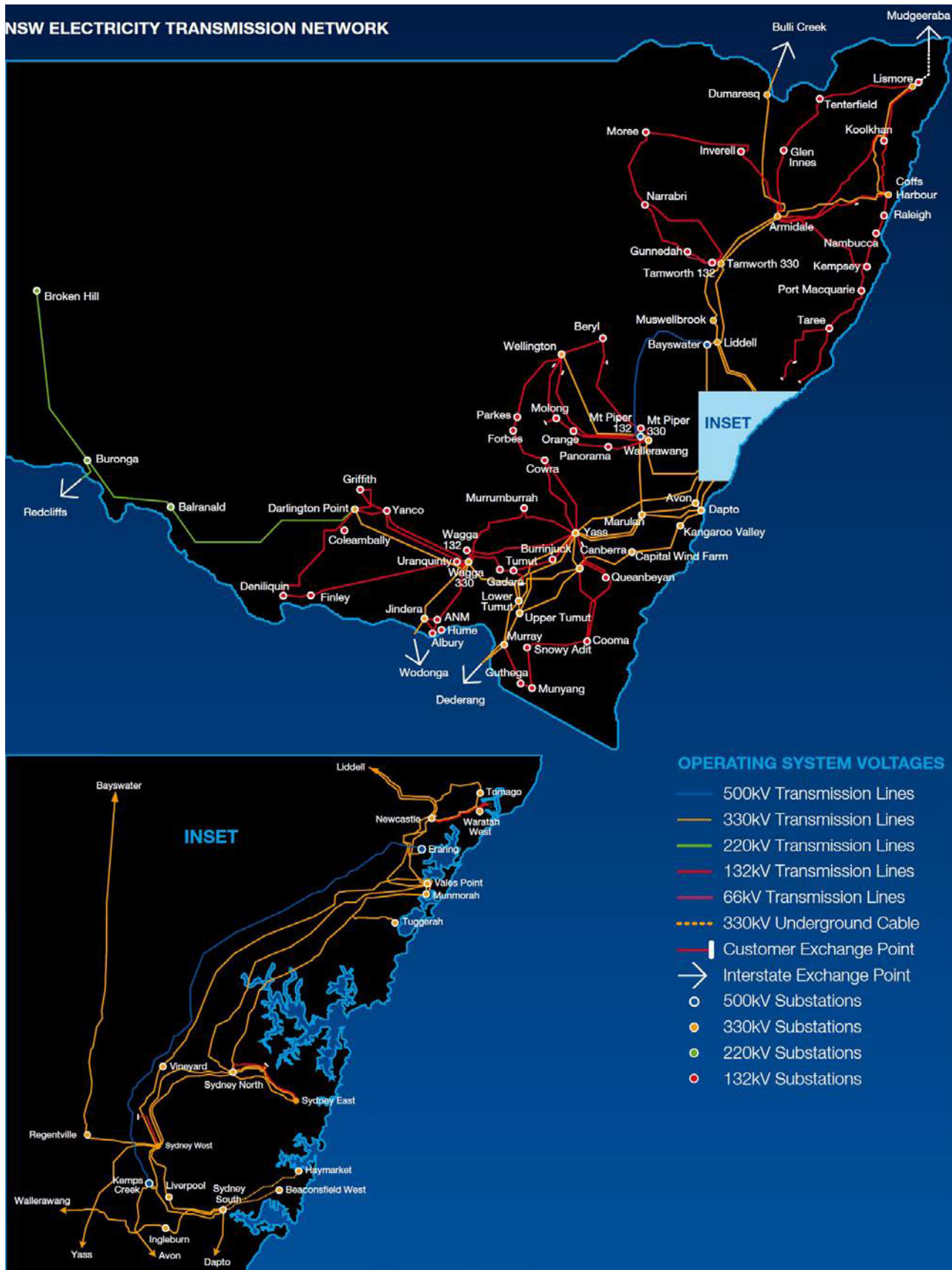
All relevant legislation and codes of practice are observed when Transgrid undertakes work using pesticides. Chemical treatment is carried out in accordance with the manufacturer's product label directions and the SDS requirements.

Further information on Transgrid's pesticide use can be obtained by calling 1800 222 537 or by visiting the website www.Transgrid.com.au.

This PUNP will be integrated into Transgrid's broader suite of management policies and procedures covering pesticide use. These include:

1. Training of pesticide users;
2. Publication of pesticide information and advice;
3. Keeping records of pesticide use; and
4. Workplace safety.

Figure 1: Transgrid Network System



2. Public Places Covered by this Plan

Transgrid proposes to use or allow the use of pesticides in the following categories of outdoor public places that are either owned by Transgrid or, to the extent that Transgrid is required to carry out its statutory functions where its infrastructure is in proximity to such places (e.g. to maintain electricity infrastructure):

1. Parks and public gardens;
2. Playgrounds;
3. Schools;
4. Picnic areas;
5. Sporting fields and ovals;
6. Road verges and reserves;
7. Laneways and pathways;
8. Easements accessible to the public (including National Parks, State Forests and on Crown Lands);and
9. Golf courses.

User groups who may access these areas include:

1. Children;
2. Adults;
3. Elderly Persons;
4. Workers; and
5. Students.

Sites not covered by the PUNP include private land, and Transgrid buildings, substations, switching stations, communication sites, or depots.

Transgrid's estimate of the level of community use, and regular user groups for each of these public place categories is summarised in Table 1.

Table 1: Transgrid pesticide usage in relation to public places and their users

Public Places	Regular user Groups	Level of use	Type of Pesticide use
Parks and Gardens	Children Adults Elders Workers	High	<ul style="list-style-type: none"> • Timber Pole treatment – application of fungicide and/or termiticides inside pole, around the pole and beneath the soil. • Cut stump application of herbicide • Spot spraying of herbicide using knapsacks or vehicle mounted spray units
Playgrounds	Children Adults Elders Workers	High	As above
Picnic Areas	Children Adults Elders Workers	High	As above
Sporting Fields, Ovals	Sporting Clubs, School Groups, General recreation	High	As above

Public Places	Regular user Groups	Level of use	Type of Pesticide use
Golf courses	Amateur & Professional Golfers Workers	Med to High	As above
Schools and TAFE	Students, teachers, employees and visitors	Med to High	As above
Road verges, Reserves & Footpaths	Local residents, Visitors	Medium to Low	As above
Easements accessible to public	Local residents, Visitors, Workers	Medium to Low	<ul style="list-style-type: none"> • Timber Pole treatment – application of fungicide and/or termiticides inside pole, around the pole and beneath the soil. • Cut stump application of herbicide • Spot spraying of herbicide using knapsacks or vehicle mounted spray units • Small scale boom spraying/broadacre hand application using vehicle mounted spray units

3. Notification Requirements

This section of the PUNP describes how and when Transgrid will provide notice of proposed pesticide use in public places.

Pesticide use is subject to suitable conditions (e.g. weather) but wherever possible information on pesticide use will give at least three days' notice of planned use and information for pesticides that have to be applied at short notice. Information available through local Transgrid staff and offices will also specify the area where pesticides will be used, the pesticide to be used and the details of the operation.

3.1 Notifications of Pesticide Use by Transgrid

1. The erection or placement of signs;
2. Postage of letters and letterbox drops; and
3. By telephone, fax, email or personal contact.

In most cases, the notification procedures will depend on the specific management technique as follows, except where no notification will be required.

These notification arrangements are based on Transgrid's assessment of:

1. Property owner notification arrangements / requirements;
2. The level of usage of public places where pesticides may be used;
3. Proximity to sensitive places such as any school or pre-school, kindergarten, childcare centre, hospital, community health centre, nursing home, or any place declared to be a sensitive place by the Environment Protection Authority by notice in the Gazette;

4. The extent to which activities generally undertaken in these areas could lead to some direct contact with pesticides (such as picnic areas where food is consumed; sporting or other recreational activities that result in contact with the ground);
5. Types of pesticide used;
6. Where, how and in what quantities they are applied;
7. Where they reside once applied; and
8. The resulting accessibility and contact risk to the public.

Notice of pesticide use and relevant pesticides applied will be provided by signs displayed at the site during pesticide application and/or information on Transgrid's website www.Transgrid.com.au .

3.2 Pesticide use by Contractors

Where Transgrid uses contractors to apply pesticides on its behalf, it will require a written commitment that they will comply with the PUNP.

3.3 Public places and pesticide uses where Transgrid will not provide any notification

Transgrid will not provide notification to the general public in any of the following public places/situations:

1. Public places over which persons or organisations hold an existing lease on Transgrid land. In these instances the lessee will be required to carry out notification as per this plan;
2. Public places that have been closed temporarily to the public where the closure is unrelated to the pesticide use (except for playgrounds); and
3. Remote areas where there is little likelihood of them being encountered by the public (for example) areas where there is no public vehicular access and low public visitation.

Transgrid will not provide notification for pesticide use in any public places it controls or owns when they are used in small quantities and are readily available at retail outlets to the general public for the control of pests for which they are registered.

Example 1: handheld spray bottle (for cut stump work)

Example 2: minor control of indoor and outdoor pests using baits or hand-held aerosols.

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 Use Notification Plan. This will include any incidental pesticide applications in areas that are controlled by other agencies.

Table 2 provides details of notification mechanisms when using pesticides.

Table 2: Notification arrangements for Transgrid pesticide application

Public Place	Application of internal or external fungicide to wood poles	Application of liquid termiticide to wood poles	Vegetation control – cut stump application by hand of selective or non- selective herbicide to vegetation	Vegetation control – spot spraying and/or application by hand of selective or non-selective herbicide to vegetation	Vegetation –small scale boom spraying/broadacre hand application of selective herbicide	Hand application of aerosol insecticide spray
Parks and Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Playgrounds	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Picnic Areas	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sporting fields, ovals and golf courses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Road verges, reserves, footpaths, and pathways	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Easements accessible to the public	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools and TAFE's	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Located next to a Sensitive Place	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Notice by display of signage during the pesticide application

No specific notice will be given other than generic Site Safety Signage the scope of works indication

4. What Information will be provided

Where a Notice of Pesticide Use is required under this plan and in accordance with clause 20(1) (h) of the Regulation, notices of pesticide use must include all the following information:

1. The full product name of the pesticide to be used;
2. The purpose of the use, clearly setting out what pest or pests are being treated;
3. The proposed date/s or date range of the pesticide use;
4. The place where the pesticide is to be used;
5. Contact telephone number and email address of the Transgrid officer who people can contact to discuss the notice; and
6. 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 of a standardised design that will be easily recognisable to the public and workers.

As already noted, Transgrid'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.

At a minimum, the site signs/notices will indicate that a pesticide will be/is being applied and provide a phone number for the onsite supervisor and local Transgrid officer. Signs/notices may be required to provide additional information as directed by the pesticide label, permit or Pesticide Control Order. In all cases the operator will also be able to provide all of the above information.

4.1 Special measures for sensitive places

Clause 39 of the Pesticides Regulation 2017 defines a sensitive place to be any:

1. School or pre-school;
2. Kindergarten;
3. Childcare centre;
4. Hospital;
5. Community health centre;
6. Nursing home;
7. Other category of place declared to be a sensitive public place by the Environment Protection Authority by notice in the NSW Government Gazette.

For pesticide use within 250 metres of sensitive places listed Clause 39 of the Pesticide Regulation 2017, Transgrid will provide prior or concurrent notice to that sensitive place by phone, door-knocking or letterbox drop, depending on what is practicable.

5. How the community will be informed of this plan and/or further revisions of this plan

Transgrid advised the community of the contents of this plan by:

1. placing a copy of this plan on the Transgrid website at www.Transgrid.com.au; and
2. making a copy of the plan available for public viewing free of charge at the following Transgrid offices during office hours:

Location	Address	Phone
Head Office / Sydney	180 Thomas Street Sydney NSW 2000	Ph: (02) 9284 3000
Western Sydney	200 Old Wallgrove Road Horsley Park NSW 2175	Ph: (02) 9620 0777
Newcastle	Wirra Crescent, off University Drive Waratah West NSW 2298	Ph: (02) 4967 8678
Orange	64-84 William Street Orange NSW 2800	Ph: (02) 6360 8711
Tamworth	Goonoo Goonoo Road Tamworth NSW 2340	Ph: (02) 6765 1666
Wagga Wagga	14 Copland Street Wagga Wagga NSW 2650	Ph: (02) 6922 0222
Yass	Perry Street Yass NSW 2582	Ph: (02) 6226 9666

For any future substantial revisions of the plan, the same notification and consultation process as described above will be followed. After the notification of a revision to the plan has been communicated (via the Transgrid website) there will be a period of four weeks set aside for members of the public and other stakeholders to make comments on the draft plan. Only comments written or emailed via the contact details listed below, or as otherwise specified in the newspaper notice, will be considered.

5.1 Revisions of this plan

This plan will be reviewed and revised as and when required but not later than 5 years from the date of the current version of this plan.

6. Contact Details

Anyone wishing to contact Transgrid to discuss this notification plan should contact:

David Donehue

Corporate Environment Manager

Transgrid | 200 Old Wallgrove Road, Wallgrove, NSW, 2766

Telephone: (02) 9620 0543

Email: David.Donehue@Transgrid.com.au

7. Definitions

Pesticide: Any substance or mixture of substances used to destroy, suppress or alter the life cycle of any pest. A pesticide can be a naturally derived or synthetically produced substance. Pesticides include, but are not limited to, herbicides, insecticides, fungicides, termiticides and rodenticides. Under the NSW Pesticides Act 1999, a pesticide is an 'agricultural chemical product' as defined in the Commonwealth Agricultural and Veterinary Chemicals Code Act 1994, namely: 'a substance or mixture of substances that is represented, imported, manufactured, supplied or used as a means of directly or indirectly:

- (a) destroying, stupefying, repelling, inhibiting the feeding of, or preventing infestation by or attacks of, any pest in relation to a plant, a place or a thing; or
- (b) destroying a plant; or
- (c) modifying the physiology of a plant or pest so as to alter its natural development, productivity, quality or reproductive capacity; or
- (d) modifying an effect of another agricultural chemical product; or
- (e) attracting a pest for the purpose of destroying it.'

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.

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.

Termiticide: Insecticide used to control termites.

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