
Housing and Public Realm Scrutiny Committee - 22nd September 2021

Report of the Acting Director of Public Realm

Use of Glyphosate for Weed Control

Purpose of Report

1. To present the current position regarding Dudley Council's use of glyphosate and outline alternative treatments and methods which could be considered to reduce and / or eradicate its application for managing weed control in the Borough.

Recommendations

2. It is recommended that members:
 - Note the contents of this report and alternative methods of weed control subject to funding approval.

Background

3. It is important to control weed growth for a number of safety reasons. Weed growth can interfere with visibility for road users and obscure traffic signs. Weeds in kerbs or around drains can prevent or slow down drainage. Their growth on pavements and in roads can damage the surface causing broken and uneven slabs on pavements and allow water ingress on roads which damages the structure of the roads in inclement weather.
4. Weed growth can also destroy paving surfaces, force kerbs apart and crack walls, causing safety issues and greatly increasing the Council's maintenance costs, as well as having a negative impact on the visual look of an area.
5. The use of pesticides within the Amenity Sector has been a common feature of maintenance schedules for well over 40 years. Pesticide producers spend millions of pounds each year in developing and obtaining approvals to market their products both to the professional and amateur markets.
6. Various different types of pesticide, with different methods of action have been used, with many now no longer in use, for a number of varying reasons. In the main these have had their approval revoked, or the manufacturer has not sought to re-approve their product as the patent may have expired, allowing other companies to develop their own formulations.

All pesticides once approved will receive a unique MAPP number (Ministry Approved Pesticide Product). Currently approvals are granted by CRD (Chemical Regulation Directorate) which is part of the HSE (Health & Safety Executive).

7. Like the majority of local authorities nationally, Dudley's strategy for weed control uses glyphosate as the principal chemical means by which to manage weeds on Council owned highways, parks and open spaces, and a report was presented to Place Scrutiny Committee on 3rd July 2019 to provide members with an overview of usage across the Borough. Dudley uses No Mix G, which is a ready formulated, oil-based emulsion containing glyphosate usually applied by a CDA (Controlled Droplet Applicator).
8. Glyphosate is a broad-spectrum systemic herbicide first formulated in 1970, introduced in 1971 and has been a commercial success since its introduction. Glyphosate is a translocated, systemic weed killer which on contact moves throughout the plant, killing roots and shoots. After the weed killer has been sprayed, it can take a few weeks to take effect. Weeds will eventually 'die-back'. It is effective on perennial weeds and is one of the few products left available to successfully control invasive species such as Japanese Knotweed and Giant Hogweed due to its approval for use on or near water.
9. Weather conditions are an important factor in the use of glyphosate. As with many herbicides, any amount of rainfall soon after spraying glyphosate has the potential to reduce absorption, translocation, and subsequent weed control. If glyphosate is applied and it rains before it is rainfast, performance will be reduced. It can therefore be very difficult to stay on top of weed control when scheduled spraying times coincide with periods of wet weather.
10. Glyphosate usually performs well under a wide range of temperatures. Best performance usually occurs when the temperature is 15-25°C at application and remains there for a few hours afterward. This is the reason that spraying generally takes place in spring and summer. When the temperature is lower than 15°C, weed growth slows, resulting in slower herbicide uptake and translocation. This increases the required rainfast period and slows the onset of symptoms and herbicide efficacy. If the temperature is below 5°C, glyphosate application should be avoided.
11. Wind speed is also a factor in the success of using glyphosate. Due to dangers of drift it is not advisable to spray during periods of wind. Also when using a knap-sack or water-based application, as can be the case in certain circumstances, higher wind speeds lower the chances of the chemical making good contact with the targeted plant and, even worse, drifting chemicals onto sensitive areas nearby. Although still relevant, this risk is lessened by the use of a Controlled Droplet Applicator (CDA).
12. Glyphosate is only approved for use in the EU until 15th December 2022. Through the European Food Safety Authority (EFSA) and the European Chemicals Agency (ECHA), the EU are reviewing its continued use and will prepare a proposal based on its findings that representatives from each member state will vote on in late 2022. The designated members for the current glyphosate renewal process – known as the Assessment Group on Glyphosate (AGG) – are France, Hungary, the Netherlands, and Sweden. In mid-June this year, the AGG published its main conclusions for glyphosate. Among the key

findings were that “taking all the evidence into account (i.e., animal experiments, epidemiological studies, and statistical analyses), AGG proposes that a classification of glyphosate with regard to carcinogenicity is not justified.” The group also concluded that the classification of glyphosate as toxic for reproduction and for germ cell mutagenicity genotoxic or mutagenic “is not justified.” “Overall, the AGG concludes that glyphosate meets the approval criteria for human health,” stated the report.

13. Following our departure from the EU, from 1st January 2021 the UK takes responsibility for its own regulatory decisions and rules. Under the new regime, the Health and Safety Executive (HSE) remains the national regulator for the whole of the UK, via its specialist CRD Division. The Plant Protection Products (Miscellaneous Amendments) (EU Exit) Regulations 2019 states that active substances which were due to expire in the EU within 3 years of the end of the transition period will be granted a 3-year extension under the new regime. This means that glyphosate is approved for use in the UK until December 2025.
14. With awareness increasing around the use of pesticides in public areas and ongoing litigation in the United States relating to glyphosate usage and the possibility that glyphosate may have its approval withdrawn in the future, local authorities are coming under increased pressure to seek alternatives to glyphosate.
15. Green Care have undertaken extensive research into alternative methods of controlling weeds, including the experience of a number of other local authorities, many of whom are in the same position as ourselves in seeking glyphosate alternatives.
16. In this report we outline our findings and our proposals over the next 12 months.

The Thanet Project

17. A detailed project was undertaken by DEFRA (Department of the Environment & Rural Affairs) between 1st October 2009 and 31st March 2015, in conjunction with East Maling Research and Kent County Council. The objective was to:
 - Develop tender specifications for non-herbicide and integrated herbicide control and improve management plans; monitor implementation
 - Measure weed growth
 - Determine herbicide losses to the wider environment
 - Carry out economic and environmental cost benefit analysis
 - Develop and launch guidelines for non-chemical control/integrated control
18. Three weed control programmes were compared:
 - Standard herbicide (two herbicide applications within defined spraying periods during the growing season)
 - Integrated (non-herbicide and reduced herbicide applications)
 - No-herbicide (non-herbicide treatments only)

19. This project has formed much of the basis of our research into alternatives to using glyphosate or as a means of reducing the amount of glyphosate used by the authority.

The Alternatives to Glyphosate

20. No-Mix Dual

A glyphosate / sulfosulfuron based herbicide applied using a Controlled Droplet Applicator (CDA). This can only be applied once per growing season and usually a follow up application of No Mix G or similar glyphosate-based herbicide is required. Sulfosulfuron does have residual properties which also prevents emergence of weed seeds after application.

Positives	Negatives
✓ Chemical can be accurately applied, with minimal risk of drift or treatment of non-target areas ✓ Ready mixed, so minimises handling of the chemical ✓ Lightweight equipment, very user friendly ✓ Has residual properties which can reduce the need for additional strimming ✓ Translocated properties, work throughout the plant. ✓ Gives a complete kill ✓ Low CO2 impact on the environment ✓ The only approved residual herbicide for hard surfaces ✓ Low application rate compared to No-Mix G or Katoun	✗ Poor public perception of use of glyphosate ✗ Not very aesthetic ✗ Higher cost in comparison to glyphosate (86% increase) ✗ When trialled by Green Care previously, some chemical resistance was evident and was found not to be as effective as promoted ✗ Unable to apply if raining ✗ Requires training to NPTC Level PA1 & PA6 (National Proficiency Test Council)

21. Katoun Gold

A chemical based on Pelargonic Acid, a “natural” herbicide. This is applied via a knapsack sprayer.

Positives	Negatives
✓ Not glyphosate ✓ Plants show signs of treatment within 2-3 hours	✗ Has a classification as an irritant when wet so may cause harm to pets and children ✗ Poor public perception as public still see spraying ✗ Needs to be mixed with water ✗ Slower operation with more refills required ✗ Requires training to NPTC Level PA1 & PA6 (National Proficiency Test Council) ✗ Less control due to use of a knap-sack leading to a higher potential for drift ✗ Manual handling issues ✗ Not very aesthetic ✗ Harmful to bees ✗ Has no translocated properties, contact only so perennial weeds still viable ✗ Higher application rate than glyphosate ✗ More expensive than glyphosate

22. Katoun Gold / Chikara

Katoun Gold can be mixed with Chikara (flazasulforon). A herbicide based from Pelargonic Acid, but with a residual chemical flazasulforon added.

Positives	Negatives
✓ Not glyphosate ✓ Plants show signs of treatment within 2-3 hours ✓ Residual properties, up to 6 months control	✗ Has a classification as an irritant when wet so may cause harm to pets and children ✗ Poor public perception as public still see spraying ✗ Needs to be mixed with water ✗ Slower operation with more refills required

	✗ Requires training to NPTC Level PA1 & PA6 (National Proficiency Test Council) ✗ Less control with a higher potential for drift ✗ Manually handling Issues ✗ Not very aesthetic ✗ Harmful to bees ✗ Has no translocated properties, contact only so perennial weeds still viable ✗ Higher application rate than glyphosate ✗ Significantly more expensive than glyphosate or Katoun Gold
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23. Foamstream

No-chemical weed control system utilising hot water and a foaming agent to retain water temperature. Destroys the cell walls of plants preventing photosynthesis.

Positives	Negatives
✓ Non chemical control system ✓ Can be used 365 days per year ✓ Very simple training, no special certification required ✓ Better public perception ✓ System can be used for cleansing as well, street furniture & play areas etc.	✗ Increased CO2 output when compared to herbicide application on foot ✗ Increased noise pollution to the public and operators ✗ Staff found it unwieldy when demonstrated ✗ Potential access issues due to parked cars ✗ Additional specific vehicles required ✗ Estimated that 8 additional vehicles & 16 additional staff to complete the recommended 3 applications per year ✗ Poorer control of perennial and woody weed species

24. Strimming

Use of mechanical trimmers to cut long grass around perimeters, obstacles, under trip

rails and against wall lines.

Positives	Negatives
✓ Not glyphosate ✓ Aesthetically more pleasing, tidier appearance ✓ Can be carried out all year round, not affected by weather ✓ Increase labour requirement, opportunity to employ more staff, this would aid the local economy	✗ Potential hand arm vibration issues for staff ✗ Carbon footprint increase from petrol engines ✗ Labour intensive ✗ Equipment more expensive ✗ Increased risk of claims from flying debris ✗ Increased noise levels for public and operatives

25. Weed Rippers

Mechanical pedestrian machines for physically removing weeds from hard surfaces.

Positives	Negatives
✓ Instant effect, looks tidy ✓ Non-chemical control ✓ Can be used all year round, not affected by weather	✗ Labour intensive ✗ Potential hand arm vibration issues for staff ✗ Carbon footprint increase from petrol engines ✗ May damage tarmac surfaces, especially if they are already in poor condition ✗ Increased noise levels for public and operatives

26. Flame Guns

Use of flames to destroy vegetative matter, a number of products are available.

Positives	Negatives
✓ Non-chemical means of control ✓ Can be used all year round, not affected by weather	✗ Cannot be used near vehicles ✗ Can damage property / infrastructure ✗ Can cause fires, especially around conifer trees ✗ Carbon footprint due to fuel burning ✗ Thanet Project dismissed this as a potential control measure

	after the first 12 months of the project, for the above reasons
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27. No Weed Control

Positives	Negatives
✓ Not glyphosate ✓ Labour saving in Green Care ✓ Reduced impact on nature conservation and biodiversity	✗ Untidy appearance ✗ Damage to roads and footpaths leading to unsafe surfaces ✗ Increased cost in highway surface maintenance ✗ Increased risk of blocked channels/gullies and therefore flooding

How Dudley Uses Glyphosate vs the Alternatives

Grass Edges & Obstacles

28. Glyphosate is applied on two occasions per year to the perimeters and obstacles to amenity cut grass areas, usually applied by a CDA (Controlled Droplet Applicator). It is believed that this regime achieves a bronze standard of weed control with the budget and resource available. **The treatment of grass edges and obstacles currently contributes to 13.6% of the Council's glyphosate usage.**

Shrub Beds

29. Glyphosate is applied on five occasions per year to shrub beds, usually by a CDA. Again, it is believed that this regime achieves a bronze standard of weed control with the budget and resource available. **The treatment of shrub beds currently contributes to 23.7% of the Council's glyphosate usage.**

Hard Surfaces

30. Chemical control of hard surfaces such as highway footpaths, tarmac paths, slabs, block paving, concrete and basalt paths are all currently controlled by using glyphosate through a CDA twice per year. This regime achieves a bronze standard of weed control with the budget and resource available. **The treatment of hard surfaces currently contributes to 62.7% of the Council's glyphosate usage.**

Alternatives

31. The table below highlights the cost difference between glyphosate and the main alternatives identified during research and shown in the tables above, as well as providing an indicator of the impact on standards.

	Current Maintenance/Cost	Alternative Solutions	Additional Annual Cost	Total Annual Cost of Alternative	Standard Achieved
Grass Edges (2,318,406 lin. M) & Obstacles (43,179)	Glyphosate x 2				Bronze
	£153,366				
		No Mix Dual x1 / No Mix G March No Mix Dual, August No Mix G			
			£43,127	£196,493	Bronze
		Strimming x 3 1 every 9 weeks approx.			
			£191,652	£345,018	Bronze
		Strimming x 5 1 every 6 weeks approx.			
			£421,664	£575,030	Silver
		Strimming x 7 1 every 4 weeks approx.			
			£651,676	£805,042	Gold
		Katoun Gold x 2/Chikara x 1 (Root of weeds not killed) Potential Trial			
			£16,233	£169,599	Bronze
		Katoun Gold x 3/Chikara x 1 (Root of weeds not killed)			
			£92,257	£245,623	Silver
		Half-Mooning Grass Edges x 1 / Strimming x 3 Half-mooning to be carried out once every 4 years – would therefore complete the Borough over 4 years			
			£379,652	£533,018	Silver/Gold

	Current Maintenance/Cost	Alternative Solutions	Additional Annual Cost	Total Annual Cost of Alternative	Standard Achieved
Shrub Beds (210,976 sqm)	Glyphosate x 5				Bronze
	£66,774				
		Hoe & Hand weed x 7 Every 5 weeks throughout Spring/Summer			
			£244,838	£311,612	Gold
		Katoun Gold x 2/Chikara x 1 (Root of weeds not killed)			
			-£7,701	£59,067	Bronze Minus
		Katoun Gold x 3/Chikara x 1 (Root of weeds not killed)			
			£19,726	£86,500	Bronze
		Katoun Gold x 4/Chikara x 1 (Root of weeds not killed) Potential Trial			
			£47,153	£113,927	Silver
		Katoun Gold x 5/ Chikara x 1 (Root of weeds not killed)			
			£70,360	£137,134	Gold

	Current Maintenance/Cost	Alternative Solutions	Additional Annual Cost	Total Annual Cost of Alternative	Standard Achieved
Hard Surfaces	Glyphosate x 2				Bronze
	£95,477				
		No Mix Dual x 1 / No Mix G x 1			
			£31,151	£126,628	Bronze
		Foamstream x 2 (assuming 20% weed infestation) Staffing and vehicle costs of operating 3 foamstream machines (plus one-off machine cost at £14,000 per unit) to complete 2 cycles during the growing season			
			£76,325	£171,802 pa + £42,000 one-off	Bronze

		Foamstream x 3 (assuming 20% weed infestation) Staffing and vehicle costs of operating 3 foamstream machines (plus one-off machine cost at £14,000 per unit) to complete 3 cycles during the growing season		
		£162,226	£257,703 pa + £42,000 one-off	Silver
		Foamstream x 2 (assuming 40% weed infestation) Staffing and vehicle costs of operating 6 foamstream machines (plus one-off machine cost at £14,000 per unit) to complete 2 cycles during the growing season		
		£248,127	£343,604 pa + £84,000 one-off	Bronze
		Foamstream x 3 (assuming 40% weed cover) Staffing and vehicle costs of operating 6 foamstream machines (plus one-off machine cost at £14,000 per unit) to complete 3 cycles during the growing season		
		£419,929	£515,406 pa + £84,000 one-off	Silver
		Weed ripper x 2 Staffing and vehicle costs of operating 11 weed rippers (plus one-off machine cost at £4,000 per unit) to complete 2 cycles in 5 months Potential Trial		
		£246,585	£342,062 pa + £44,000 one-off	Bronze

Conclusion

32. What has become evident throughout our research is that glyphosate remains the most cost effective and efficient method of weed control. The introduction of alternatives will result in a budget pressure and a potential decrease in standards.
33. The Association of Public Service Excellence (APSE) recently provided a briefing to its members on glyphosate. The key points they highlighted are:
- There is no right or wrong answer to the question “is it safe to use glyphosate products”
 - There are few alternatives to glyphosate and those which are seen as alternatives are often still in a pilot phase and much more expensive to use
 - There may be a need for the public to accept higher levels of weeds if the use of glyphosate is banned
 - Ending the use of pesticides on hard surfaces will likely mean that there will be more visible weeds for longer periods of time. However, weeds do contribute to biodiversity by providing a habitat and source of food for bees and other insects.

Of particular note, APSE says “it may be prudent for all local authorities to carefully consider the scale of glyphosate use, the likely risks arising, the potential to limit the reliance on glyphosate-based products and the ability to find a suitable alternative product to prepare for the future”.

34. With growing public pressure to reduce or eliminate the use of glyphosate, and uncertainty around its long-term approval for use, it is sensible that the Council should

work towards reducing chemical use by testing and adopting alternative maintenance techniques (where suitable) in the coming years.

35. The Council's Environmental Thematic Climate Change Group, chaired by the Acting Head of Street and Green Care, is already looking at initiatives that will support a reduction in the use of glyphosate, including identifying suitable sites for rewilding. Educating the public to accept a less well manicured, but more bio-diverse townscape will also be part of this process.
36. An Integrated Management Programme is essential in the management of weeds. The Authority's Street Cleansing regime, in particular channel and pavement sweeping, is a fundamental aspect of this programme. This may require an increase in sweeping regimes to remove detritus, which creates a seed bed for weeds, and which will also remove small weeds before they can develop and to identify the level of increased maintenance would require additional trials. In addition to this, any further reduction to weed control would result in increased damage to the highway infrastructure, which would be accelerated as part of the winter maintenance programme.

Furthermore, there is a need to design the issue out in future design landscapes, such as reduced block paving and the introduction of concrete mowing strips under trip rails and fences.

37. Dudley has four HGV channel sweepers, and the current channel sweeping regime across the Borough is as follows:

Town centres – weekly
Main roads – weekly/fortnightly
Dual carriageways – fortnightly
Residential – 8-week cycle

It should be noted that during the Autumn, the regime will be affected due to the requirement to undertake leaf clearance.

38. Dudley has six footway sweepers which operate at varied schedules. An overview of this regime is as follows:

Town centre pedestrian areas – large town centres daily/3 x per week, smaller town centres fortnightly
Footpaths adjoining main roads – fortnightly
26 identified hotspot areas – fortnightly

It should be noted that during the Autumn, the regime will be affected due to the requirement to undertake leaf clearance.

39. As part of Dudley's development of an Integrated Management Programme for weed control, mechanical sweeping regimes are being reviewed both in terms of location and frequency.

40. As part of the development of any Integrated Management Programme, Street Cleansing will need to work up options to extend the coverage of footway sweeping Borough-wide on a trial basis, potentially using additional hired sweepers and temporary staff. One option being explored is to review the footways in the 26 hotspot areas currently swept fortnightly and the feasibility of reducing this frequency. This may allow the introduction of either 4-weekly or 6-weekly cycles in residential areas across the entire Borough. The indicative additional sweeper and staffing costs for each of these options are outlined in the table below. More work is required to establish operational impact, such as storage of additional sweepers, management of waste and staffing issues:

Residential Footway Sweeping Frequency	Additional Footway Sweepers Required (Lease Costs)	Additional Fuel & Disposal Costs	Additional Sweeper Operatives Required (Salary Costs at Grade 6)	Total Additional Annual Cost
4-weekly	6 Sweepers at £41,000 per vehicle pa = £246,000	£30,000 pa	6 Operatives at £32,000 pa = £192,000 pa	£467,000
6-weekly	2 Sweepers at £41,00 per vehicle pa = £82,000	£10,000 pa	2 Operatives at £32,000 pa = £64,000	£156,000

41. In addition to the above, Green Care could also look at options in relation to tractor-mounted weed rippers to tackle weed growth on concrete bands around traffic islands, central reservations and pedestrian refuges on the highway. Indicative costs of machinery are currently being obtained and these will be used in conjunction with any trials to develop further specifications and overall estimated service costs.
42. Some alternatives, for example foam treatment and strimming, have significant negative environmental consequences caused by the CO2 emissions of the diesel/gas powered generator units, machinery and vehicles used.
43. However there are alternatives to petrol strimmers, i.e. battery operated, but these tend to be even more expensive, have limited operational capacity and due to the numbers needed would require the development of extensive charging facilities at Green Care depots.

The Way Forward in Dudley

Grass Edges and Obstacles

44. Subject to funding being identified, Green Care could eliminate the use of glyphosate to treat weeds on grass edges and around obstacles by undertaking a trial using one application of Katoun Gold/Chikara in March 2022 and one application of Katoun Gold only in August 2022, to treat these areas. If successful, this would result in a 13.6% decrease in the Council's glyphosate usage overall.

Shrub Beds

45. Subject to funding being identified, Green Care could eliminate the use of glyphosate to treat weeds in shrub beds across the Borough by undertaking a trial in the use of Katoun Gold / Chikara in these areas, commencing in March 2022. If successful, this would result in a further 23.7% decrease in the Council's overall glyphosate usage.

Hard Surfaces

46. As highlighted above, Street Cleansing are currently looking into options appraisals for the most appropriate mechanical sweeping regime to support weed control across the Borough.
47. Subject to funding being identified, a trial could be undertaken into the use of weed rippers during the winter months of 2022. Options are currently being worked up for the best weed ripper attachment/vehicle combinations to be used in a trial. A trial will allow us to ascertain potential ongoing effects to the highway infrastructure due to the aggressive nature of this form of weed control.
48. Due to the costs involved, any trials may be limited to smaller geographic areas to carry out a cost benefit analysis, which could then be implemented Borough-wide if successful.

Finance

49. The current total cost for weed control across the Borough is £315,617 per year.
50. To be completely Glyphosate free is detailed above but will depend on the overall service requirement expected.
51. The additional funding required to carry out the trials highlighted above would be dependent on the approach taken as follows:
52. Grass Edges and Obstacles alternative chemical application = £16,233, which we will propose as a growth item in the forthcoming Medium Term Financial Strategy (MTFS).

In addition to this we could trial areas using alternative strimming regimes to help compare results and the service standards achieved with each regime. As detailed above, the projected cost to carry strimming across the whole borough would be between £191,652 and £651,676, dependent on the frequency applied.

53. Shrub Beds alternative chemical application = £47,153, which we will propose as a growth item in the forthcoming MTFS. As above, this could be reduced by adopting trial areas and would allow us to compare the alternative options and compare results and associated issues for each method.
54. Hard surfaces – due to the high cost of initial set up and the high level of staffing resources required we would look at setting alternative trials in different parts of the

Borough. This would allow us to accurately quantify the overall cost for the whole service area, as well as compare results and associated issues for each method.

Any changes to the method of weed control would be better done in conjunction with an increase in sweeping. This is particularly relevant in relation to residential roads and, as detailed above, this could be in the region of £156,000 to £467,000 per year, or possibly more dependent on the frequency agreed.

55. These additional costs are indicative, and the outcome of any trials will allow us to quantify them more accurately going forward. However, the size of a trial would be subject to identifying the relevant budget but proportionally could cover say 5% of the borough.

Law

56. Under Section 111 of the Local Government Act 1972, the Council is empowered to do anything which is calculated to facilitate, or is conducive to, or incidental to the discharge of its functions.
57. Pursuant to Section 1 of the Localism Act 2011 a local authority has a general power of competence to do anything that individuals generally may do.

Risk Management

58. No risks have been identified in the Council's Risk Management Framework.

Equality Impact

59. The Borough's green space is accessible to all in line with the Council's equality and diversity policies. Most major parks and nature reserves have been audited for physical accessibility and any new developments are designed in consideration of Green Spaces Access Design Guidelines/ Standards.
60. Increased weed growth has a direct impact on access for persons using the Boroughs highway, amenity and hardstanding areas and this must be factored into any service change that may have a detrimental impact upon service standards.

Human Resources/Organisational Development

61. There are no HR or Organisational Development implications.

Commercial/Procurement

62. There are no Commercial or Procurement implications.

Council Priorities

63. The contents of this report support the following Council priorities in the Council Plan 2019-2022:

A Cleaner and Greener Place to Live

- Sustaining our Highway Network
- Developing Green Space

64. Any trials undertaken into alternatives to glyphosate will include a complete assessment of any environmental implications and will feed into the Climate Change Environmental Thematic Group.



Acting Director of Public Realm

Contact Officer: Tim Johnson
Telephone: 01384 815510
Email: Tim.Johnson@dudley.gov.uk