Letter from Paul Melsom for the meeting of the Panel on Food Safety and Environmental Hygiene Tuesday, 12 July 2011 3.50p.m. for the Pesticides (Amendment) Bill

l am very concerned with the current Pesticide ordinance Cap 133. especially with regards to the health risks associated with the use of pesticides in schools, playgrounds, public places, public footpaths and anywhere children play. Pesticides are hazardous chemicals especially around young children, with their continued exposure and bioaccumulation to these chemicals which can lead to serious health risks. Some pesticides are linked to causing serious health risks which include cancers, birth defects, neurological problems, Parkinson's disease etc.

In fact, in my experience many of the people who are responsible for the spraying these pesticides including contractors, gardeners or the admin people who organize the pesticide spraying in schools have generally little knowledge or more usually no knowledge at all of the dangers of these chemicals pose to health. Although there are guidelines for safety through the Agricultural, Fisheries and Conservation Department (AFCD) and the Food, Environmental Hygiene department(FEHD), these fall along way short of the best international standards. Even the guidelines that are in place are in my experience are mostly not adhered to, especially for instance when pesticide sprays are used in and around schools. In fact the most worrying thing is that anyone can spray dangerous pesticides in schools or virtually anywhere with having no knowledge, no training or no safety precautions

As examples of the pesticides that are recommended in the AFCD booklet 'Pesticides used for Outdoor Mosquito Control' and that can be sprayed in schools Malathion and Chorpyrifos which are hazardous organophosphate insecticides should never be allowed to be sprayed in schools. There is in fact no special safety guidelines for pesticides used in schools! Additionally another organophosphate, 'Diazinon which is not on their Mosquito booklet has been sprayed in schools by contractors. Diazinion is banned in the whole of the European Union which with withdrew it use because of the health risks it posed. So why is not sent along with many pesticides sprayed in H.K. schools.

Gramoxone (or Paraquat) a herbicide can also be sprayed in schools under the ordinance and I have seen herbicides sprayed around the edges of a kindergarten. There will be inevitably spray drift and the chemical will be brought into the school on shoes and the children will brush up against the weeds.

For your ref:-

Food and Environmental Health Department guidelines on pesticides

3/FEHD 1.3.1 Risk assessment

Unnecessarily using pesticides may increase the hazards to humans, animals and the environment. Consider other effective pest control measures before resorting to the use of pesticide. If no alternative is practicable, avoid causing damage to the environment or hazards to human and animal health when using pesticides.

Points to note when conducting risk assessment on the use of pesticides:

- The pesticide is permitted by law for the intended purpose.
- The user has adequate safety training.
- Adequate safety measures have been put in place.
- The pesticide can be used at the place and time planned for its application.
- The pesticide poses least risk to humans, animals and the environment

These Food and Environmental Health Department guidelines are totally inadequate for schools. In my experience of working in schools, in the majority of cases the children, teachers and parents are not informed of mosquito spraying in or around the school. The areas are rarely if ever cordoned off for safety. According to the AFCD a 2 year a comprehensive record of pesticide spraying should be kept. But is this ever done and shouldn't every school have this comprehensive record? Are these comprehensive pesticide spray records ever checked?

Many of these pesticides are either banned in some countries or restricted in use in many others. So why do we allow such dangerous chemicals to be sprayed around children and the public?

Diazinon for instance is a neurotoxin and has a half life in the soil of over 30days and Gramoxone has a half life in soil which is much longer. This means that these pesticides are around for a long time after they are sprayed and children playing can pick these up continually for along tome after they are sprayed absorbing them into their skin or through ingestion.

There should be an <u>immediate suspension of many of these pesticide sprays</u> used in school and children's play areas and looking to the very near future of H.K. pesticide free schools.