

Submission for Pesticides Amendment Bill 2013 Hong Kong

From Paul Melsom April 15, 2013

The Hong Kong Pesticide Amendment Bill 2013 is too far removed from real health threats from pesticides that are actually being used in the environment and the health risks posed by them on people. These pesticides which are commonly used for controlling pests such as mosquitoes and cockroaches may be overly used and unnecessarily introducing large amounts of toxins into the environment putting children and the public at unnecessarily risks of exposure to these chemicals and increasing their risk of damaging their health both in the short term, medium term and long term. The risks of using these chemicals has to be balanced with what the real threats and harm from these insects may actually cause and what maybe just perceived threats. Is it worth poisoning our children and the public with neurotoxic chemicals for the sake of an irrational fear of insects or nuisance insects where safer means should be sought. Much health related diseases from these chemicals are still unknown and by allowing these chemicals to be sprayed widely we are acting foolishly in not containing their safe use.

Public engagement and a wider public consultation on Pesticides

As pesticides are used widely in Hong Kong in places like schools, offices, playgrounds, restaurants, domestic premises then it is only right that the public are fully informed about these potentially health risk chemicals that are being sprayed around in their environment. There should be full public engagement with the public by asking them for their views and concern's regarding pesticides. Many times in the past the H.K. government have requested the public through the media of television for instance for their views. Why can't this be done for pesticides?

Additionally with the Pesticide Amendment bill 2013 which is so very obviously being of concern to public health, I would have thought it prudent to engage in experts from the Health department and experts in toxicology from the Universities.

Hong Kong should look at taking the use of pesticides very, very seriously and adopt some of the best international standards for safety and research. The U.K. is one such country that could be taken as example.

They have established the 'Health and Safety Executive', Chemicals Regulation Directorate, and also the 'Advisory Committee on Pesticides'

The 'Advisory Committee on Pesticides' contains members that have a wealth of knowledge and understanding on pesticides. The committee members of the U.K. Advisory Committee on Pesticides 2012 includes six Professors, nine Doctors and four other related experts covering important specialist areas affected by pesticide use including medicine, epidemiology neurotoxicology, Toxicology ecotoxicology, Acute Medicine and Toxicology, horticulture, agriculture, health and safety consultant and a specialist on exposure to harmful chemicals and dermal absorption.

<http://www.pesticides.gov.uk/guidance/industries/pesticides/topics/using-pesticides/faq-concerns->

Hong Kong with its sub-tropical climate probably uses far more pesticides around public areas with more urban pest insects such as mosquitoes and cockroaches compared to the U.K. with its cooler temperate climate, so it only makes sense that Hong Kong should invest far more money and technical expertise and resources especially for the health specialists to investigate the health risks from pesticides. After all it prides itself as a World city and it should be a World city protecting the health of its population from the effects of pesticides.

I reiterate that Hong Kong should take pesticides far more seriously and adopt the U.K.'s level of expertise and employ international experts if there are not enough specialists such as toxicologists especially in the field of pesticide dermal absorption.

Pesticides in schools.

In my experience the AFCD guidelines and the FEHD Risk Assessment are completely failing the children and staff in schools due to several factors. A taskforce should be set up to look at the safest means of pest control in schools and work out a safe integrated natural pest control scheme as opposed to what presently happens in some schools with the arbitrarily spraying of pesticides for mosquitoes, cockroaches and on other pests on a routine basis. To allow children in particular to come into close contact with some neurotoxic pesticides is completely wrong especially when they play and sit on the floor, play amongst plants, with more exposed skin and put their fingers in their mouths only helps increase their risks of vulnerability to the effects of these health risking chemicals.

1/ Should include provision for safety of pesticides used in schools, playgrounds, domestic premises.

2/ Health and Safety officers in schools should attend courses for safety training on the health risks of pesticides and be knowledgeable in all aspects on these chemicals used in schools around children, staff and visitors. Many teachers learn First -Aid and many take a first aid certificate exam and there should also be a Pesticide/Chemical Health and safety certificate for Schools which should be taken by the Health and safety officers in schools. They should also possess the knowledge to know which chemicals are potential health hazards which can affect children and staff in the school.

2/The proper use of pesticides by the pesticide applicator should be also be taken far more seriously than it presently is. After all mistakes can occur easily in any profession or even deliberate manipulation of the dilution pesticide solution for a greater insect kill can potentially increase the effect of dermal poisoning for children in schools. Spills of pesticides, poor pesticide spraying technique in schools, pouring chemicals wastage down sinks are all very dangerous acts which go completely unmonitored in schools in schools and these issues are not addressed adequately in the bill. In fact what are strangers from Pest control companies are allowed into schools to spray chemicals without any supervision or checking of what or where they are spray these poisonous chemicals is UNBELIEVABLE.

3/ More attention should be given to the active and Half-life of pesticides and also long term contamination of pesticides in the school environment including enclosed classrooms which are not open to natural processes of the breakdown of pesticides.

4/ More thorough research on the micro encapsulated pesticides (which includes Pyrethroids for Cockroaches) is needed especially when used in classrooms and domestic premises. I suggest these should be suspended in schools from immediate effect until more is known about their effects.

5/ There should be a review to see if indeed Organophosphates can be used in schools classrooms and playgrounds and there should be an **immediate suspension** of the use of these dangerous neurotoxins used in schools.

Workplace concern of pesticide use.

Additionally with workplaces and institutions it is very difficult for individuals to question or complain about pesticides and chemicals used in their close vicinity. For everyone's safety this matter should be looked

into and like bullying or drugs in schools which is taken very seriously and so peoples pesticides concerns should be treated just as seriously and everyone should have the right to be heard and question the use of chemicals around them and the risk to theirs and other people's health. Understandably knowledge on pesticides and their health effects are very poor and the government should do more to educate the public on chemicals that may affect their health.

Websites: AFCD and FEHD pesticide.

The AFCD websites and the FEHD should be far more user friendly, accessible and contain far more health related relevant information for the pesticides used including half-lives of the pesticides, health risks associated with each pesticide with the site regularly updated. At the moment both these websites are very difficult to navigate for information and the information is not user friendly and as I have stated it far from adequate.

Combining the Government departments into one body overseeing the pesticide safety measures especially for health and the environment

Additionally it should be a consideration to combine the AFCD, FEHD with the EPD, LCSD and with some additionally health risk assessment from the health bureau. In fact as with the U.K. there should be one central government department formed for pesticides and dangerous chemicals.

Hotline for pesticides and quick knowledgeable response team.

I have contacted the Government Helpline 1823 on numerous occasions to draw their attention to the misuse or inadequate safety measures, or not following the AFCD guidelines or FEHD risk assessment involving incidents of pesticide misuse. But their response has mostly been very slow and usually several days or much longer.

There should be a quick response team to incidents that pose a threat to public safety especially in places like schools with an immediate response to the incident.

Two such incidents I will outline here.

1/ One school premises was being sprayed with a Pyrethoid pesticide using the Ultra-light volume spray method at 10.30a.m. in the morning from the street and firing it into the school high in the air. I rang 1823

and it took them many days to get back to me. In this instance they should have come immediately to investigate.

2/ One school was sprayed inside the classrooms with a pesticide which contains microencapsulated balls of a Pyrethroid based pesticide as well as another pesticide. The combined Half-life of the microencapsulated pesticide is around three months and with a rolling programme of spraying throughout the year it means these pesticides are around for nine months or longer in the classrooms each year. Pesticides like these microencapsulated ones should not be used when children have exposed skin and sit on the floor in classrooms. The FEHD or AFCD should have come out immediately to investigate these circumstances but instead they said there was nothing they can do under the Pesticide ordinance as it stands.

In this incident also there was no prior warning to parents that pesticides were going to be used in the school and the FEHD risk assessment states that the safest means should be used first and spraying the classrooms on a rolling spraying programme is increasing the health risks from pesticides in classrooms. Sticky Cockroach traps could have been used here first instead and would have been a much safer alternative.

With reference to LC Paper No. LS20/12-13 **Paper for the House Committee Meeting on 8 February 2013 Legal Service Division Report on Pesticides (Amendment) Bill 2013.**

It appears from this report that stake holders and five organizations were briefed and consulted on this bill and all of them supported the legislative proposals.

Public Consultation According to the Administration, stakeholders and five organizations were briefed and consulted. All of them supported the legislative proposals.

Can you name these stake holders and five organizations during the period from May to September 2011?

Were other important government departments consulted about pesticide use in Hong Kong namely the Health Bureau?

Also it would be prudent that the Government Education departments need to be informed about the health risks associated with pesticides used in schools as thousands of school children's health are being put at risk

The Pesticide amendment bill 2013 includes many references to changes in clauses for the CAP 133, however without the original Pesticide amendment bill attached to this amendment bill it appears to be a deceitfully inadequate document by not including the aforementioned document.

Nano-pesticides

Lastly there appears no provision for the evitable introduction of Nano-pesticides and products which should be treated with great caution as there are still many unknowns with these new products.