

# PE2117/B: Ban the use of toxic chemicals along our coasts

## Petitioner written submission, 30 October 2024

I submitted this petition because I became concerned as a resident about the frequent spraying of toxic chemicals on the Hawes Pier.

My specific complaint is that although SEPA has granted a permit for use of these chemicals I believe that it has failed to enforce the Conditions of the Permit as follows:

1. The permit requires application to be via a "Low mounted spray bar on a road sweeper with the edges of the pier being manually applied for greater control"

In fact, the spraying is done manually by workers who constantly spill it over the pier edge into the river. This contravenes this condition of the permit. (I have previously submitted photographic evidence of this but these are not accepted from petitioners)

2. The permit requires that "The application of the Algae Inhibitor must be at the authorised location and must not enter *any river*, burn, ditch, wetland, loch transitional water *or coastal water*."

The spraying is done on the Hawes Pier which slopes into the *coastal* estuary of the *River Forth*; this contravenes 2 of the permit's conditions.

3. The permit states that "Algae Inhibitor must not be applied:

- a) during rainfall;
- b) if heavy rain is forecast within 24 hours; or
- c) during conditions when there is a risk that spray will be blown outwith the area to be treated."

I have evidence that all 3 of these conditions were breached

### Any challenges and solutions:

The **challenge** is to allow safe embarkation of cruise passengers and other pier users aboard vessels visiting the pier, with due regard to the right to a healthy and peaceful environment for residents, and to the protection of the local ecology. The application of toxic chemicals cannot easily be proven safe for aquatic life. A project to re-introduce the native oyster to the Forth fishery is currently being carried out by Heriot-Watt University. The council must prove beyond any doubt that the toxic chemicals being applied cannot threaten the success of this initiative.

A **solution** for centuries for those using maritime structures to board vessels is gangways, duckboards and rubber matting to cross slippery algae and seaweed, which can all be deployed quickly and cheaply, without any risk to the environment.

### Whether the petition is realistic:

This is a subjective point! I firmly believe the Council is ignoring the impact of its careless approach to the challenge, and should listen to this sensible alternative.

**Other work that might be happening to address the petition:**

I am not aware of any other work underway.

I am happy to appear before the Committee and to provide the evidence detailed above.