



Ministry of Defence

Secretariat
St George's House
Defence Infrastructure Organisation
DMS Whittington
Lichfield, Staffordshire
WS14 9PY

E-mail: diosec-parli@mod.gov.uk
www.gov.uk/DIO

15 August 2022

Ref. FOI 2022/08602

Dear [REDACTED],

Thank you for your email of 15 July 2022 requesting the following information:

- "1. Any information relating to the permitted use of glyphosate herbicide by Tivoli Group Limited on the MoD estate at Beachley Barracks, Chepstow from 2018 to the current date.*
- 2. Any information relating to the limits on use of glyphosate herbicide by Tivoli Group Limited on the MoD estate at Beachley Barracks, Chepstow from 2018 to the current date.*
- 3. Any information relating to any concerns raised about the use of glyphosate on the MOD estate at Beachley Barracks, Chepstow from 2018 to the current date."*

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA).

A search for the information has now been completed within the Ministry of Defence (MOD) and I can confirm that some of the information in scope of your request is held.

The information you have requested can be found enclosed, below and attached at Annex A. However, I must advise that some of the information in your request falls entirely within the scope of the exemption provided for under Section 40 (Personal Data) of the FOIA, and has been redacted.

For ease of reference, I have numbered your request for information above.

- 1. Any information relating to the permitted use of glyphosate herbicide by Tivoli Group Limited on the MoD estate at Beachley Barracks, Chepstow from 2018 to the current date.*

The below table is the volume of glyphosate applied on the MOD estate at Beachley Barracks in Chepstow from 2018 to date:

Year	Litres
2018	40.7
2019	24.25
2020	35
2021	47.75
2022	13.55

The estimated total areas this is applied to is 430,000m² and this includes the built estate and housing.

2. *Any information relating to the limits on use of glyphosate herbicide by Tivoli Group Limited on the MoD estate at Beachley Barracks, Chepstow from 2018 to the current date.*

Information is not held.

Under Section 16 of the FOIA (Advice and Assistance), you may find it helpful to know that all regulatory requirements of the Plant Protection Products (PPP) Regulations are adhered to and as such, all reasonable precautions are taken to protect human health and the environment. The application of the pesticide to the crops or area to be treated are confined, when using pesticides in certain specified areas. For example, in areas used by the general public, the amount of PPP used and the frequency of use, are as low as is reasonably practicable, and all personnel undertaking applications hold the required spraying qualifications and certificates.

Further information about the PPP can be found via the following link:

<https://www.legislation.gov.uk/uksi/2011/2131/contents/made>.

3. *Any information relating to any concerns raised about the use of glyphosate on the MOD estate at Beachley Barracks, Chepstow from 2018 to the current date.*

Please find attached at Annex A. Please note that some information has been redacted due to Section 40 (Personal Data) of the FOIA.

Section 40(2) has been applied to some of the information in order to protect personal information as governed by the Data Protection Act 2018. Section 40(2) requires the Department to conduct a balancing exercise, this exercise involves balancing the rights and interests of individuals against the legitimate interests in disclosure, this is not the same as carrying out the public interest test associated with certain exemptions in FOIA. The balancing exercise is carried out in order to decide whether the absolute exemption in section 40(2) is engaged. In particular, there is no assumption of disclosure in the legitimate interests test, as there is with qualified exemptions. The outcome of the balancing exercise lay in withholding the third-party personal data identified in the attached information.

If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.gov.uk). Please note that any request for an internal review should be made in writing within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely

DIO Secretariat

[REDACTED]

From: [REDACTED]
Sent: 04 August 2022 17:16
To: [REDACTED]
Subject: FW: Use of Glyphosate at Beachley Barracks

Dear [REDACTED]

Thanks for your e-mail and I note the following:

As confirmed in my previous e-mail our team have agreed that going forward, they will not spray grass edges and only use glyphosate on hard standings and a minimal amount around obstacles where required.

The photos of your seedlings look like they have been bleached by the sun. My view would be that if glyphosate had come into contact with your seedlings, it would have killed them and there would be no growth.

I am not sure who maintains the land you refer to under the Severn Bridge.

Regards

[REDACTED]

From: [REDACTED]
Sent: 25 July 2022 13:48
To: [REDACTED]
Subject: Re: Use of Glyphosate at Beachley Barracks

Dear [REDACTED]

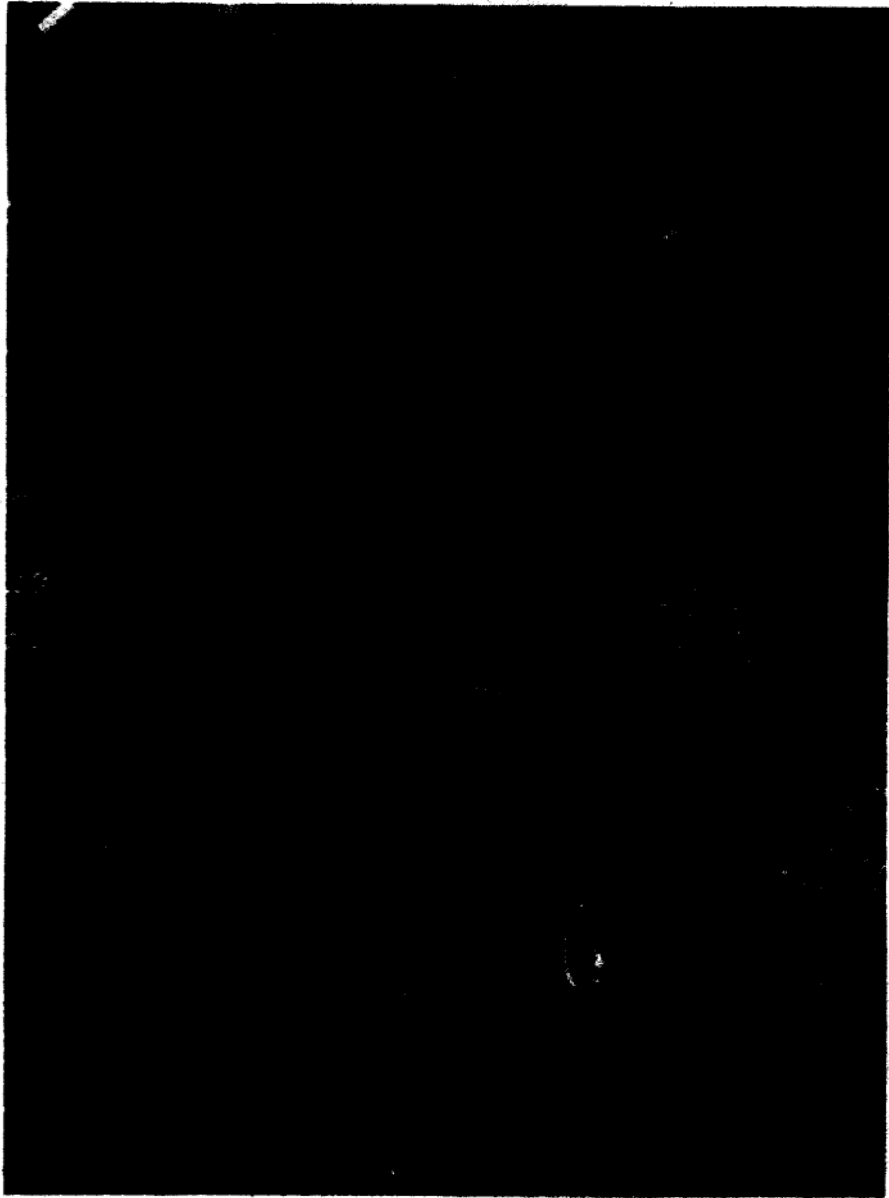
Many thanks for your email and the time you've taken on this important matter. I am very glad to hear that you have recognise the danger of significant over use of glyphosate at Beachley and have confirmed this will be now limited. Can you confirm weedkiller will not be used in any gardens, pavement edges or running tracks which are all areas children play.

With regards to my plants, I am afraid I cannot accept that there is no damage. I have attached photos of the sweet pea seedlings which show leaf bleaching consistent with glyphosate exposure. My pumpkin seedling also showed this, at the time they were sprayed they were on the path in pots and I have now planted them out. They are not growing at the rate the other were which were in pots further from the path.

Thank you for confirming Tivoli are not responsible for the no low area under the bridge between the running tracks and the track running parallel with the estuary. Can you provide me with details of who does manage this please? It appears to be part of the MOD estate so I am surprised to hear it is not Tivoli, given that it was sprayed about the same time I saw the groundsman spraying the pathway that runs at the back of our houses. I saw him spraying an elder bush and brambles so if it's not Tivoli managed land, he should not have been spraying it.

I look forward to hearing from you.

Kind regards



Can you let me know

Sent from my iPhone

On 25 Jul 2022, at 08:21, [REDACTED] <[REDACTED]> wrote:

Dear [REDACTED]

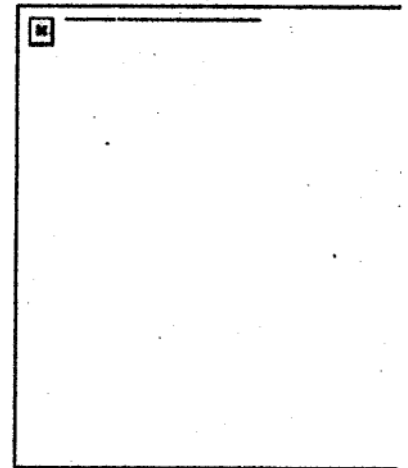
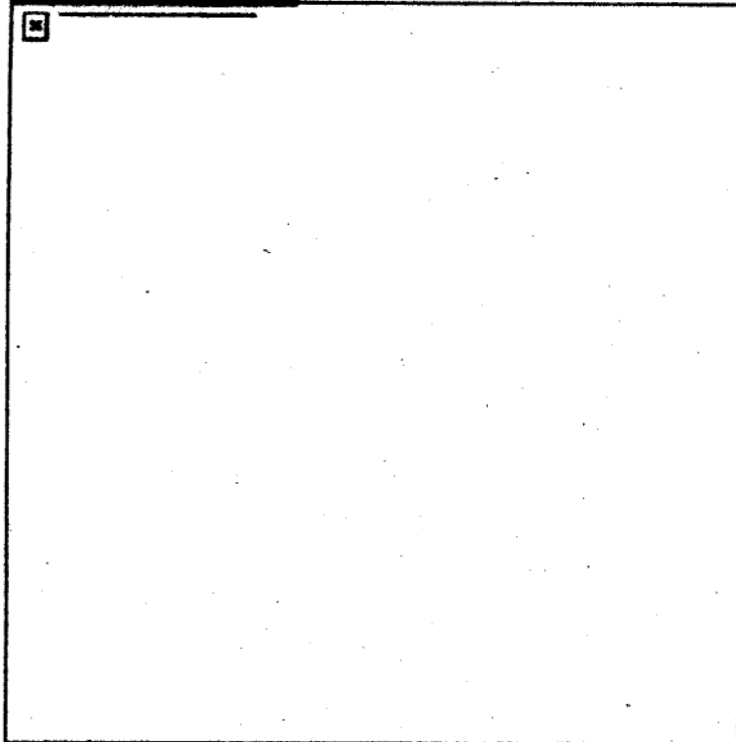
My senior manager attended Beachley last week (21st July) to review the site and meet with you as arranged. Unfortunately, they were unable to contact you despite several attempted calls throughout the morning.

My team toured the site and identified a small number of areas where there was potential evidence of unnecessary use of glyphosate on some grass edges. However, they found no evidence of damage to your borders or garden plants. The team have agreed that going forward they will not spray grass edges and only use glyphosate on hard standings and a minimal amount around obstacles where required.

They also reviewed the other areas you mentioned around Beachley point. These are not maintained by Tivoli and as such, I can assure you that any poisoning of brambles and the use of spray in no mow areas was not undertaken by Tivoli.

I would like to thank you for bringing this matter to my attention. If you would like to meet up with the local team at any point, please let me know.

Regards



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From: [REDACTED]
Sent: 20 July 2022 09:14
To: [REDACTED]
Subject: Re: Use of Glyphosate at Beachley Barracks

Dear [REDACTED]

Many thanks. Sadly, after stating that I do not want weed killer used on our property, last week the groundsman was out spraying the pathway that runs behind our house and sprayed along the edge of the fence and caught the hollyhock plant that I have growing there. The spray is becoming evident on the leaves. Please can you explain 1) why he is spraying in my garden and 2) why he is spraying what are plainly plants growing in someone's garden?

As I have said I have young children and I should not have to expose them to weedkiller just because a tivil groundsmen decides he's going to spray poison everywhere. I am astounded and disappointed this has happened, after the conversation stating no weed killer to be used at [REDACTED]

Kind regards

[REDACTED]
Sent from my iPhone

On 20 Jul 2022, at 06:21, [REDACTED] <[REDACTED]> wrote:

Dear [REDACTED]

First of all apologies for not responding to you earlier, I have just got back in after a long weekend break

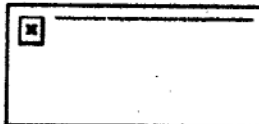
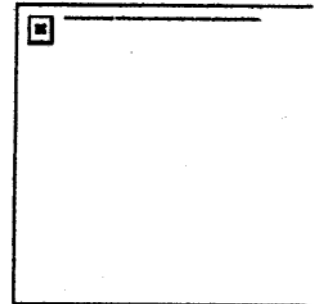
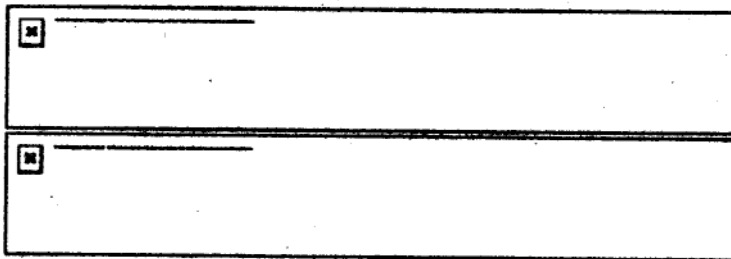
Thanks for bringing the below to my attention. I have asked a member of my senior regional management team to visit the site this week and carry out an investigation on the points you note.

When I get the investigation back to review, we will be able to respond to you accordingly

Regards

[REDACTED]

[REDACTED]



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From: Central Admin <admin@tivoliservices.com>
Sent: 16 July 2022 10:28
To: [REDACTED]; [REDACTED]
Cc: RSC West & Thames Valley <rscwest@tivoliservices.com>
Subject: Use of Glyphosate at Beachley Barracks

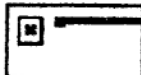
Hi both,

Please see below email that came in yesterday afternoon.
Can I leave this with you?

Let me know if you need me to do anything.

Regards [REDACTED]

Central Admin



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-----Original Message-----

From: [REDACTED]
Sent: 15 July 2022 16:45
To: Central Admin <admin@tivoliservices.com>
Subject: Use of Glyphosate at Beachley Barracks

FAO the Board of Directors Tivoli Group Limited

Dears Sirs,

Use of Glyphosate at Beachley Barracks, Chepstow, NP16

I am writing to complain about the excess use of glyphosate based herbicide on the base.

Not only is glyphosate used liberally across any roadside, garden or fence edge, it appears to have been used on the areas under the Severn Road Bridge and on the sides of the footpath running all round Beachley Point. As this area is a "no mow"

area in line with the MODs environments commitment, I can see absolutely no justification for the glyphosate on bramble bushes other than profit - centred laziness, in that it is quicker to spray everything than for the employees to use a strimmer.

The bramble bushes produce abundant blackberries in the late summer, but as they have all been sprayed, the blackberries have been poisoned and cannot now be eaten and enjoyed by families on the base.

There are many children on the base and I hope the fact that their environment has been poisoned merely to save the grounds men using a strimmer horrifies the management of Tivoli Services as much as it does me.

Unless it has escaped your attention, not only was glyphosate listed as a probably human carcinogen in 2015, has been confirmed toxic to vital pollinators such as bees. It is sad irony that the Tivoli logo includes the very creature that your groundsmen are destroying.

I look forward to receiving your assurance that this practice will stopped immediately.

Yours faithfully

[REDACTED]

[REDACTED]