Canadian Food Inspection Agency
Ottawa, Ontario
K1A 0Y9

Agence canadienne d'inspection des aliments
Ottawa (Ontario)
K1A 0Y9

PRC 021682

January 4, 2019

Mr. Steven Snell
Conservation Policy Team Lead
The City of Calgary
Floor 7, Calgary Public Building: 205 - 8th Ave SE
P.O. Box 2100, Station M #54,
Calgary, AB Canada T2P 2M5

Dear Mr. Snell:

Thank you for your email of December 4, 2018, to the CFIA regarding the City of Calgary's Pest Management Policy document.

Representatives of the Plant Protection Division have reviewed your Pest Management Policy and they were very complimentary of the work that has been done and the quality of the plan presented. Although they did not identify priorities for specific strategies, they did suggest the following resources for your consideration.

One set of tools is the biosecurity standards and producer guides posted on the CFIA website at the following link: http://www.inspection.gc.ca/plants/plant-pests-invasive-species/biosecurity/eng/1323475203667/1323475279124. Included is a generic planning guide as well as a sector specific standard and producer guides for the greenhouse, nursery and floriculture sectors. These tools may assist you in your strategies related to pest prediction and prevention.

Another tool that may be of use is related to domestic plant protection measures. It includes details on pests that are regulated within Canada and what provinces they may occur in. It can be found at the following link: http://inspection.gc.ca/plants/plant-pests-invasive-species/domestic-measures/eng/1523384657071/1523384657601.

As you develop your list of pests of key concern you may wish to use the list of plant pests regulated by Canada as a guide. It includes plant pests, including invasive plants, that are regulated by the CFIA and can be found at the following link: http://www.inspection.gc.ca/plants/plant-pests-invasive-species/pests/regulated-pests/eng/1363317115207/1363317187811. Pests included on this list must be reported to the CFIA when they are detected in an area where they are not known to occur. This

.../2

Canada

includes pests such as emerald ash borer or Dutch elm disease which are also included in your policy. Information on reporting a pest can be found at: http://inspection.gc.ca/plants/exports/reporting-plant-pests/eng/1447869166567/1447869167554 .

Future engagement on this policy or other policies related to plant health can be directed to the CFIA through Roger Skinner (roger.skinner@canada.ca) who works for the CFIA with Southern Alberta Operations.

Thank you once again for the opportunity to provide feedback and I commend the City of Calgary for the proactive development of such a policy.

Sincerely,

for J. William Anderson
Executive Director, Plant Health and Biosecurity Directorate
Canadian Food Inspection Agency

c.c.: Mr. Trevor Janzen, CFIA, Director of Operations, Alberta South

Dow AgroSciences Canada Inc.
Suite 2400, 215 - 2 Street SW, Calgary, AB T2P 1M4

dowagro.ca

January 11, 2019

Steven Snell
Conservation Policy Team Lead
The City of Calgary
Floor 7, Calgary Public Building: 205 - 8th Ave SE
P.O. Box 2100, Station M #54
Calgary, AB Canada T2P 2M5
T: 403.268.3527; M: 403.850.2091

Dear Mr. Snell:

SUBJECT: **CITY OF CALGARY PEST MANAGEMENT POLICY - EXTERNAL STAKEHOLDER REVIEW**
Comments Provided by Dow AgroSciences Canada Inc.

Dow AgroSciences Canada Inc. (DAS) appreciates the opportunity to provide the City of Calgary with comments for the stakeholder consultation related to the principles that will become the policy statements in the pest management policy within the City.

As requested we have made comments and proposed changes to the strategies, and we have proposed a priority level to each one of them. Please also refer to our letter dated February 6th 2017, which includes further details about our position on pest management within the City.

Dow AgroSciences would welcome an opportunity to meet with you or other City staff to discuss our knowledge of pest control products and pest management approaches.

For any further information, do not hesitate to contact me directly,

Sincerely,

Regulatory & Environmental Affairs Manager

How wonderful is it when something doesn't happen ... when "something" is cancer?
Check out our Cancer Prevention Tips
Sign up for occasional news, and science-based advice and actions.
Please consider supporting our work, to stop cancer before it starts. Donate today.

On 2019-01-14 11:25 PM, Meg Sears wrote:

Dear Mr. Snell,

Thank you for the opportunity to provide input regarding Calgary's Integrated Pest Management (IPM) program.

Prevent Cancer Now is a Canadian civil society organization that works to stop cancer before it starts, by eliminating preventable contributors to cancer. For over 10 years, I have been communicating with the City of Calgary, encouraging the adoption of least-toxic, more sustainable landscaping solutions. I will not replicate all of these communications and materials, but would be happy to re-send some if necessary to have these concerns included at this juncture.

Prevent Cancer Now has been pleased to learn of some pilots such as grazing goats, but we are disappointed that use of toxic pesticides remains a commonplace feature in Calgary. Indeed, Calgary is Canada's largest city to continue to expose their citizens to these chemicals. In the spring of 2018, we documented spraying of Garlon on bare vegetation on sloped banks beside waterways and pathways. The public is required to be kept away from this toxic mixture. The label stipulates that it is meant for actively growing vegetation, and should be sprayed well away from waterways, to prevent contamination with the toxic chemicals.

Prevent Cancer Now declines filling in the large spread sheet; rather we will share some observations.

When we met last spring, we shared information on increasing chronic diseases that are appearing in younger Canadians. These conditions are associated with toxic chemical exposures. Pesticides, designed and intended to be toxic to living organisms are among the top potential contributors to biological effects leading to problems ranging from early development to metabolic, inflammatory and neurological conditions as well as cancers, at younger ages. We shared detailed analyses of weaknesses in the federal system of pesticide assessment and regulation, that leave many important considerations off the table. Indeed, the current conversation in the news regarding glyphosate exemplifies many of these concerns. We issued a press release on Health Canada's refusal to strike an independent review panel this morning.

It is clear that you did not "hear" our concerns, because a central concern is that aggregate and cumulative toxic exposures have disproportional effects on health, particularly for the most vulnerable. As well, many pesticides, including herbicides and insecticides used by the City of Calgary, are well recognized to mimic or block hormone actions. These "endocrine disruptors" have different

effects at different doses, and when encountered at different stages of development. For example early life exposure of a pregnant woman can impair brain development and change the trajectory of a newborn's life. Subtle effects across a population can be costly to society. The statement at the very end of the spreadsheet, indicating a simple relationship between risk, dose and hazard, is *simply not true.* It is a common mis-statement, a source of immense confusion, and is used to justify exposure of the population to chemicals that in fact have no "safe" level of exposure.

We feel that scarce resources should not be dedicated to tasks that are primarily necessary for use of chemical herbicides, such as estimation of emergence based on degree days.

All communications to citizens should focus on non-toxic strategies and solutions.

We are disappointed that IPM reports are not made available online (or if they are online, please point them out). Tracking of the success of IPM has a poor history. Rather than dandelion complaints (but not pesticides complaints) reported previously, it would be more meaningful to report actual pesticide usage and solid measurements such as undesired plants per square metre, that are verifiable and replicable. There are many alternatives to grass, that would be more resilient and appropriate for Calgary's ecozone, and the increasingly extreme weather.

Prevent Cancer Now looks forward to the day that Calgary reports that it successfully managed its landscapes with zero toxic chemicals, and in the process enriched the soil with significant quantities of carbon to blunt climate change, increased numbers and diversity of pollinators and other species, and other important ecological factors. Sustainable, pesticide-free landscaping practices can achieve healthier landscapes for humans and the diversity of creatures in Calgary, and with this the potential for healthier citizens.

You should be aware that in the early days of IPM, its development bifurcated. The clever, assiduous practitioners ended up leaving toxic chemicals behind because they were unnecessary. The majority of Canadians have done the same. We truly hope that Calgary will find its way to follow this example.

Please keep us informed of next steps in this file. We hope that Calgary will streamline its operations to truly minimize and eliminate toxic chemicals, and would be most honoured and pleased to assist in this important transition.

Sincerely,

Meg Sears

--

Meg Sears PhD
Chair, Prevent Cancer Now
613 832-2806
613 297-6042 (cell phone)
Meg@PreventCancerNow.ca
www.PreventCancerNow.ca

Steven Snell
Conservation Policy Team Lead, the City of Calgary
Calgary Public Building, 205 - 8th Ave SE
Calgary, Alberta
T2P 2M5

January 14, 2019

RE: CropLife Canada comments on the City of Calgary pest management policy – external review

On behalf of Canada's plant science industry, CropLife Canada appreciates the opportunity to comment on the external review of the City of Calgary's pest management policy.

CropLife Canada is the trade association representing the manufacturers, developers and distributors of plant science innovations — pest control products and plant biotechnology — for use in agriculture, urban, and public health settings. Representing approximately 98 per cent of this product market in Canada, our member companies have significant business, public health, wellbeing and environmental interests in Alberta and in the City of Calgary.

CropLife Canada is appreciative of the City of Calgary's consultative approach to developing its future pest management policy. We strongly support the vision articulated in the policy, in that the City of Calgary will use science-based decision making to effectively manage pests. However, we are concerned that this vision does not percolate throughout the entire policy. We are confident that the following comments and suggestions, summarized briefly below, will further improve the utility of the proposed approach.

A science-based approach to regulating pesticides in Canada
The Pest Management Regulatory Agency (PMRA) of Health Canada is responsible for registering pesticides for use in Canada under the *Pest Control Products Act* (PCPA). Pesticides are one of the most stringently regulated products in Canada. Before a pesticide can be approved for use in Canada, PMRA requires that it undergo a thorough scientific review and safety assessment to ensure it meets Health Canada's standards to protect human health and the environment. Only those products that meet these standards are registered by the PMRA for use or sale in Canada.

Federal, provincial, and territorial governments share responsibility for the regulation of pesticides, with each serving a specific role. However, we have found that multiple jurisdictions with inconsistent or unscientific approaches to pesticide regulation can create unnecessary enforcement challenges and result in the erosion of consumer confidence in the regulatory system that protects public health and safety and the environment.

All pesticide products on the market in Canada, whether they are intended for agriculture, lawn and garden, forestry, or other uses, have been specifically assessed by PMRA for use by specific users and are considered safe in all jurisdictions across Canada when used according to label directions. It is for this reason that we are concerned by some of the language found in the *Prioritize human health and ecosystem health objectives* section (pg. 9) of the pest management policy document.

Our primary concern is that the use of terminology such as “cosmetic” and “least toxic” ignores both the federal process and the weight of the scientific evidence used to regulate pesticides in Canada. “Cosmetic” and “least toxic” are not phrases that are used by federal regulators. Rather, PMRA speaks of “acceptable risk”, a more nuanced but much more accurate scientific phrase. There are no sound scientific criteria to support the decision to prohibit the use of so-called “cosmetic pesticides” while continuing to permit so-called “least toxic” products. The “low risk/least toxic” determination that is commonly applied to non-conventional products (e.g., naturally occurring products) versus their conventional counterparts (e.g., synthetic), is simply false. Risk (or lack thereof) is unrelated to the origin of the active ingredient or mode of production, which is why we have a stringent federal regulatory system that evaluates all pesticides according to strict scientific criteria.

Furthermore, in Canada, there are pesticides approved for use in all public spaces. An effective pest management policy should include the use of pesticides, when required, to address pest problems on all city-owned land and property. Restricting use to only certain areas could conceivably require more resources than taking an all-inclusive approach as pests and weeds do not respect artificial boundaries.

During the pesticide registration process, results from more than 200 types of scientific studies must be submitted to determine if the pesticide would cause any negative effects to people, animals, birds, insects, plants, as well as on the soil and in the water. This includes specific risk assessments for sensitive sub-populations, such as infants and children. The unique physiology, behaviours and play-habits of children are considered when determining how much exposure they could encounter. Extra safety factors are applied when warranted to protect sensitive subgroups.

To this end, any comparison of relative toxicity or establishing additional arbitrary setback zones for PMRA-registered products is not warranted and should not be pursued by the City of Calgary. As previously mentioned, CropLife Canada supports the existing federal position that all products which are reviewed and approved by PMRA are safe for use as long as they are used according to label directions.

In conclusion, we would like to reiterate our thanks to the City of Calgary for the opportunity to provide input into this important consultation. If you have any questions or comments, please do not hesitate to contact me.

Kind regards,

Darell Pack
Director, Provincial Regulatory Affairs and Stakeholder Relations

ACME CAPE
Association Canadienne des Médecins pour l'Environnement
Canadian Association of Physicians for the Environment

Submission to the City of Calgary IPM Review

Avoiding Pesticide Health Risks in Calgary

December 19, 2018

1. Who is the Canadian Association of Physicians for the Environment, and what is your interest in the City of Calgary's review of its Integrated Pest Management (IPM) plan?

Founded in 1993, the Canadian Association of Physicians for the Environment (CAPE) is a national non-profit organization directed by doctors who are committed to bettering human health by protecting the environment. CAPE advances healthy public policies related to pesticides, active transportation, climate change and air pollution, among other issues. CAPE is an affiliated member of the Canadian Medical Association.

From its inception, the Association has worked to reduce human exposure to pesticides as a public health goal. We supported municipal and provincial legislation restricting the non-essential uses of toxic pesticides in Ontario, New Brunswick, Newfoundland and Labrador, and Manitoba. In 2016, CAPE published a policy report[1] outlining municipal and provincial restrictions on non-essential uses of pesticides across Canada. This was followed in 2018 by a case study report[2] that examined how a number of Canadian municipalities are successfully delivering weed control programs under bans on the non-essential uses of toxic pesticides. CAPE has also commissioned public opinion research on pesticides in Manitoba, Alberta, and Newfoundland and Labrador.

In June 2017, we filed a submission[3] with the City of Calgary's Standing Committee on Community and Protective Services in response to the City's Pesticide Toxicity Report (CPS2017-05-10).[4] When the issue of pesticide toxicity subsequently reached Calgary City Council, CAPE provided an overview letter[5] to members of Council underscoring the reasons why we believe the City should reduce its use of toxic pesticides. Councillors directed that a review of Calgary's IPM program be carried out, and that health groups such as CAPE be consulted during the course of the review. We welcome the opportunity to assist the City in this matter.

2. From the perspective of a health organization, what are your general comments on Calgary's IPM plan?

The City's current IPM plan,[6] now some 20 years old, includes references to protecting human health and the environment, implementing horticultural practices to enhance soil and turf, reducing pesticide use, choosing least toxic products, educating the public, and reporting regularly on pesticide use to ensure accountability, among other topics. We are pleased to see references to human health explicitly included. For example, the plan acknowledges citizens' concerns about pesticide use and its "associated

health and environmental impacts" (p. 2). A policy statement affirms the City's commitment to "manage vegetation and pests using IPM principles that … minimize the risk to human health and the environment … [and] … minimize the use of pesticides" (p. 29). Goals for the City's corporate use of pesticides include an intent to "ensure that any pesticide use minimizes adverse impacts on human health or the environment" (p. 35). Further, where it is decided that pesticides will be used, "preference [is to be] given to low toxicity and highly selective products" (p. 59).

These commendable statements represent an acknowledgement in policy that the human health impacts of pesticides ought to be a significant factor in decisions around pesticide use. In implementation and in practice, however, it appears that toxic pesticides are far from a last resort in Calgary. Indeed, a number of pesticides used for weed control by the City are banned for that purpose in other Canadian jurisdictions: for example, 2,4-D, mecoprop, dicamba and glyphosate.

Typical IPM approaches claim to follow a "least toxic" hierarchy in pest management choices. But the City's pesticide use report for 2016[7] reveals that 31 of 35 pesticides used by the City (including all 15 of the herbicides) were in the second-highest risk category, as set out in Alberta regulations. The pesticide use report for 2017[8] follows a similar pattern.

CAPE's observation is that IPM policies allowing for the use of the more toxic pesticides too often simply serve to normalize their use. It is not surprising, then, to see wide, permissive conditions for pesticide use spelled out under a section on Maintenance Standards in Calgary's IPM Plan:

> However, where standards are high and tolerance for pest damage is low (e.g. areas with aesthetic importance, functional purpose, historical value, or extensive public investment), it may be difficult to avoid chemical use: applying alternative management strategies and practices may not work; fiscal resources may inhibit intensive application of effective non-chemical methods; maintenance personnel may feel compelled to use pesticides to meet expected levels of quality or protect the integrity of the site or feature (p. 33).

CAPE notes that dozens of cities across Canada, operating under restrictions on non-essential uses of pesticides, are able to maintain priority green spaces in well-groomed, attractive and functional condition within available budgets without using the banned products.

In short, as Calgary's IPM experience suggests, as long as toxic pesticides remain within reach, they will be used. Clearly, stronger safeguards are needed to regulate pest management decisions in Calgary, so as to reduce health-harming risks to citizens of all ages who use public parks, sports fields and other green spaces.

3. What is the main concern you want to bring to the attention of the IPM review?

CAPE's primary focus here is on protecting Calgary residents from the health risks associated with exposure to toxic pesticides that are used within the City of Calgary. The 2016 motion of City Council that led to the above-noted City pesticide toxicity report signals a concern on the part of Councillors with regard to pesticide risks. CAPE is not satisfied that the administrative response to this motion (then or since) has given sufficient consideration to these concerns.

As an organization concerned with environmental impacts on human health, CAPE wishes to highlight the pesticide health risks that are reported in a number of published systematic reviews of

epidemiological studies. Epidemiology can be understood as the branch of medicine that investigates the prevalence and distribution of diseases in selected populations. We provide references to four systematic reviews [9] [10] [11] [12] which, taken together, include more than 500 pesticide health studies.

This substantial body of research tells us that children are most at risk from exposure to pesticides. The dangers of exposure for children include increased risks of low birth weight and pre-term births in babies, deficits in cognitive and motor development, hormonal (endocrine) disruption, learning disabilities and other developmental deficits, birth defects such as cleft palate, and childhood cancers such as leukemia and brain cancer. Children's elevated risks reflect several factors: their relatively large body surface-area-to-weight ratio; their vulnerability during early stages of physical development and during periods of rapid growth; their long life expectancy (for problems to develop); the fact that they often play close to the ground on grass on residential lawns, in parks, at schools and on playgrounds; and their typical hand-to-mouth behavior (i.e., putting their hands and objects in their mouths on a frequent basis). In many studies, the harmful effects noted in children were related to the exposure of their mothers during pregnancy or to children's exposure at a young age.

Human exposure to pesticides can occur through direct contact with skin (dermal absorption), through food and water (oral ingestion), or from breathing (inhalation). Exposure to a given pesticide may occur simultaneously through more than a single pathway. As well, people are typically exposed to other toxic substances (including other pesticides) at the same time. For some harms affecting children especially, there are critical windows of vulnerability — i.e. pre-conception, prenatal, or during infancy or childhood. During these vulnerable periods, even single, low-dose exposures may cause harm that may not occur at a later stage of development.

In adults, the range of range of harmful effects associated with exposure to pesticides includes increased risk for Parkinson's disease, asthma and obstructive lung disease, Amyotrophic Lateral Sclerosis (ALS), diabetes, and cancers such as non-Hodgkin lymphoma, leukemia and cutaneous melanoma, among other risks.

We note that when non-essential lawn and garden pesticides are the source of such exposures, these are preventable harms.

4. What would CAPE like to see the City of Calgary do in light of these health concerns, and why?

As Calgary's experience demonstrates, IPM on its own is clearly insufficient as a policy instrument to limit public health risks associated with pest control. CAPE recommends that **the City of Calgary, as a corporate entity, should eliminate its own routine use of toxic pesticides in City-managed parks and green spaces.** This step is needed, at minimum, to reduce the public health risks resulting from the City's own current pest control practices.

We understand that the IPM policy review now under way is focused on the City's corporate use of pesticides. However, we note references in City reports to the use of pesticides in the broader community when, for example, comparisons are made between City and residential pesticide use.[13] As well, there is explicit acknowledgement of citizens' concerns about pesticides in the IPM Plan itself.[14] From a health perspective, a review of IPM in Calgary, together with the evidence of high levels of residential pesticide use across the City, highlights the need to reduce human exposure to pesticides used by the City itself and by others. CAPE recommends that implementing restrictions on non-essential uses of pesticides should be an important public health goal of Calgary City Council.

Accordingly, **CAPE urges the City of Calgary to enact a bylaw restricting non-essential uses of toxic pesticides on residential and privately owned lawns and gardens as well as in City-managed green spaces,** drawing on successful pest control bylaws and regulations in other jurisdictions (e.g., Ontario, Manitoba, Vancouver, and many others). CAPE's recent study of municipal weed control found that such policies work well and are readily accepted by the community. At present, Alberta is one of only two provinces that do not have a provincial law or multiple municipal bylaws restricting the use of toxic pesticides for non-essential purposes.

CAPE notes that a 2016 public opinion poll,[15] conducted in Alberta for CAPE and Prevent Cancer Now, found that two-thirds of respondents were concerned that pesticides pose a threat to the health of children, and over 60 per cent supported a law to phase out the sale and use of toxic pesticides on lawns and gardens. Understandably, people want to live in healthy communities where they and their children are not exposed to avoidable pesticide health risks. More than 80 per cent of Canadians live in communities where restrictions on toxic pesticides are in effect.

Childhood exposure to pesticides is an especially relevant concern in Calgary, where the population is younger than that of most Canadian cities. Statistics Canada[16] reports that 18.8 per cent of Calgary's residents in 2016 were age 14 or younger, the third-highest percentage among Canadian cities. As noted above, young people in this age cohort are in active stages of physical development and are among the most vulnerable members of the community when it comes to health risks associated with pesticides. Calgary, which is the largest city in Canada without restrictions on non-essential uses of pesticides, should be protecting its young residents from avoidable health risks.

5. The City of Calgary states that it uses only pest control products that have been approved by Health Canada's Pest Management Regulatory Agency (PMRA). Why does CAPE believe that PMRA approval is not a sufficient assurance of pesticide safety?

There are simply too many troubling gaps, flaws and weaknesses in Canada's pesticide regulatory process. In evaluating pesticides, the PMRA relies on industry-supplied studies that are too often neither independent nor peer-reviewed. Frequently, there are missing pieces in the data; for example, insufficient evidence on health impacts of chronic, low-dose exposure to pesticides. The evaluation system does not take adequate account of the real-world effects of pesticides on human populations. For example, risks from pesticide exposures through multiple pathways and risks from combined exposures to several chemicals simultaneously are not well addressed in the evaluation process.

Pesticide toxicity can be greatly increased when other chemicals are added to the main active ingredient in retail product formulations. These additives may include surfactants, solvents, preservatives and other product enhancers. Formulations can be many times more toxic than the main active ingredient alone.[17] However, PMRA evaluations are often carried out on just the active ingredient(s), and not on the formulated products that are actually sold and used. In such cases, the health risks associated with the use of formulated products may be seriously underestimated.

Further, although the federal Pest Control Products Act[18] requires the re-evaluation of registered pesticides after 15 years, the PMRA has admitted that it is far behind in conducting such reviews. There were some 125 re-evaluations of pesticides under way as of October 2018, and a further 145 due to launch in the next five years. The Agency acknowledges that it is not sufficiently resourced to carry out these reviews in a timely way. This means that products originally approved on the basis of decades-old

studies can remain in use for extended periods of time without updated assessments of their health and environmental risks.

Troubling revelations about evidence used in the recent PMRA re-evaluation of glyphosate have arisen out of an August 2018 California court decision. Internal company documents filed in that case raise questions about the role of the Monsanto Company, the manufacturer of many widely-used glyphosate-based herbicides, in preparing or reviewing a number of studies of glyphosate. In Canada, the legal non-profit organization, Ecojustice, has found that the PMRA, in its 2017 re-evaluation decision approving glyphosate for a further 15 years, referenced some of these studies. As a result of these findings, Ecojustice, on behalf of CAPE and a number of other health and environmental groups, has asked the federal Minister of Health to order a new review of glyphosate and of the evidence used by the PMRA in its re-evaluation of this pesticide.[19] Until the questions are resolved and a review is completed, the PMRA's re-approval of glyphosate remains under a cloud.

Because of gaps in data, the lack of independent peer review of industry-sponsored studies, questions about industry influence over the evidence used in evaluations, delays in the completion of pesticide re-evaluations, and other critical deficiencies (such as the failure to test product formulations, not just active ingredients), CAPE observes that that the PMRA's flawed and inadequate evaluation process is not reliably health-protective.

6. What are CAPE's recommendations concerning Calgary's IPM program and the use of pesticides within the City?

- CAPE recommends that the City of Calgary should adopt a corporate policy that restricts the use of toxic pesticides in City-managed parks and green spaces. Where pest control measures are needed for the protection of public health or for compliance with noxious weed legislation, least toxic methods and materials should be used.
- To strengthen and extend the benefits of pesticide reduction as a public health goal within the City of Calgary, CAPE further recommends that Calgary City Council should enact a municipal bylaw restricting non-essential uses of toxic pesticides on lawns and gardens throughout the city. CAPE's 2016 policy report identifies a number of best practices in municipal pesticide policy, and examples of bylaws are available from other Canadian cities.

CAPE is pleased to assist the City of Calgary in its reconsideration of pesticide use. The City has an opportunity at this time to take important steps to protect residents from unnecessary exposure to harmful pesticides.

PREPARED BY	WITH THE SUPPORT OF	AND
Randall McQuaker	Meriah Fahey, MD, FRCSC, NCMP	Andrea Hull, MD, CCFP, DTMH
Pesticides Director	Obstetrician/Gynecologist	Family Physician
	Calgary, AB	Calgary, AB

The Canadian Association of Physicians for the Environment (CAPE) is the only doctor-directed national, non-profit organization in Canada dedicated to improving human health by protecting the environment.

From: Randall McQuaker
To: Snell, Steven
Subject: [EXT] Re: CAPE submission to Calgary IPM review
Date: Thursday, December 20, 2018 4:14:30 PM

Hi Steven,

Thanks for your note. As you indicate, the Plan to which CAPE is responding is the existing IPM plan of record that is posted on the City web site. We began preparing our submission several weeks before seeing the "Pest Management Policy - External Review" document dated December 2018. Of course, we did subsequently read the tables in that document, with particular attention to the third principle, "Prioritize human health and ecosystem health objectives."

We are really not in a position to provide detailed commentary and prioritization for each of the strategies identified under the category of sub-results for each of the principles. In any case, I think we would want to avoid being caught up in areas that are outside of CAPE's focus. For example, I don't think CAPE has a great deal to offer in the matter of techniques for monitoring and inventorying populations of organisms identified as "pests" in Calgary.

However, with regard to the third principle, which certainly is within CAPE's area of concern, it was not clear to us how the proposed statements around human health would have the effect of putting the more toxic pesticides out of reach for routine, non-essential uses. (Lots of "wiggle room" in that section and under the principle on science-based decision-making.) We believe that a clear commitment to avoid the use of toxic pesticides for non-essential purposes needs to be explicit in the City's pesticide policy.

In light of these concerns, we concluded that CAPE should outline a 'big picture' perspective on pesticide health risks and flaws in the federal pesticide regulatory system, in order to put this information on the record in the IPM review process and to provide a rationale for policy responses that would eliminate citizens' exposure to pesticides used for non-essential purposes. These policy responses, in CAPE's view, should also include a prohibition on non-essential uses of pesticides beyond the City's corporate practices.

With regard to your question, then, if CAPE does wish to further address the content of the human health/ecosystem health principle and the associated strategies set out in the external review document, we have noted the deadline of January 14, 2019.

I do want to say that I really appreciate all the work that you are putting into this exercise. Thank you also for keeping us posted.

Best Wishes for the Holidays and the New Year to come!!

Randall

From: Snell, Steven

Sent: December 20, 2018 9:54 AM
To: Randall McQuaker
Subject: RE: CAPE submission to Calgary IPM review

Hi Randall,
It seems your submission is generally referencing our IPM plan from 1998. Will you be providing comments on the revised draft policy that was distributed to you and other stakeholders earlier this month?
Steven.

Steven Snell, MRes*
Conservation Policy Team Lead
*Master of Research in urban design
M 403.850.2091

From: Randall McQuaker [mailto:randall@cape.ca]
Sent: Wednesday, December 19, 2018 2:49 PM
To: Snell, Steven
Subject: [EXT] CAPE submission to Calgary IPM review
To: Steven Snell
Conservation Policy Team Lead
City of Calgary
Hello Steven,
In connection with the City of Calgary's review of its Integrated Pest Management Plan, please find attached a brief from the Canadian Association of Physicians for the Environment. Thank you.

Randall McQuaker, Pesticides Director
Canadian Association of Physicians
for the Environment (CAPE)
randall@cape.ca
CAPE website
Winnipeg Office (204) 688-2558

Endnotes

[1] Canadian Association of Physicians for the Environment (CAPE). 2016. "Cosmetic Pesticides – Provincial Policies and Municipal Bylaws: Lessons Learned and Best Practices." Prepared by Ian Arnold and Kim Perrotta. Retrieved from https://cape.ca/wp-content/uploads/2018/04/Pesticides-Policy-Report-FINAL.pdf

[2] Canadian Association of Physicians for the Environment (CAPE). 2018. "Municipal Weed Control: Lessons from Ground Zero." Prepared by Randall McQuaker and Kim Perrotta. Retrieved from https://cape.ca/wp-content/uploads/2018/10/Municipal-Weed-Control-Report-October-11-2018-.pdf

[3] Canadian Association of Physicians for the Environment (CAPE). 2017. "Response and Recommendations Concerning Pesticide Toxicity Report CPS2017-0510." Prepared by Randall McQuaker. Retrieved from https://cape.ca/wp-content/uploads/2018/03/3.CAPE-submission-to-Calgary-SPC-June-7-2017-as-filed.pdf

[4] City of Calgary. 2017. Pesticide Toxicity Report. Retrieved from https://pub-calgary.escribemeetings.com/filestream.ashx?DocumentId=6923

[5] Canadian Association of Physicians for the Environment (CAPE). 2017. Letter to Mayor Naheed Nenshi and Calgary City Councillors re: Report on Pesticide Toxicity (CPS2017-0510. Retrieved from https://cape.ca/wp-content/uploads/2018/03/4.Letter-to-Calgary-City-Council-Recommending-Reductions-in-Pesticide-Use-June-2017.pdf

[6] City of Calgary. 1998. "Integrated Pest Management Plan." Retrieved from http://www.calgary.ca/CSPS/Parks/Documents/Planning-and-Operations/Pest-Management/integrated-pest-management-plan.pdf

[7] City of Calgary. July 2017. "2016 Pesticide Use Report."

[8] City of Calgary. October 2018. "2017 Pesticide Use Report." Retrieved from http://www.calgary.ca/CSPS/Parks/Documents/Planning-and-Operations/Pest-Management/2017PesticideUseReport.pdf

[9] Bassil K, C Vakil, M Sanborn, DC Cole, JS Kaur, KJ Kerr. 2007. "Cancer Health Effects of Pesticides – Systematic Review." Canadian Family Physician. October 2007. 53 (10). Retrieved from http://www.cfp.ca/content/53/10/1704.full

[10] Chief Public Health Office, Prince Edward Island (PEI). 2015. "Pesticides and Human Heath." Prepared by Carolyn Sanford, DVM, PhD, David Sabapathy, MD, MBA, MSc, PEng, FRCPC, Heather Morrison, MD, MPhil, DPhil, CCDP(EM), and Katherine Gaudreau RN, BScN, MSc. Retrieved from http://www.gov.pe.ca/photos/original/cphs_pesticipt1.pdf

[11] Ontario College of Family Physicians (OCFP). 2012. "2012 Systematic Review of Pesticide Health Effects." Prepared by Marg Sanborn, MD, CCFP, FCFP, Kate Bassil, MSc, PhD, Cathy Vakil, MD, CCFP, FCFP, Kathleen Kerr, MD, MCFP, Dip. Env. Health, and Kelsey Ragan, MPH. Retrieved from http://ocfp.on.ca/docs/pesticides-paper/2012-systematic-review-of-pesticide.pdf

[12] Sanborn M, Kerr KJ, Sanin LH, Cole DC, Bassil KL, Vakil C. 2007. "Non-cancer health effects of pesticides – Systematic review and implications for family doctors." Canadian Family Physician. October 2007. 53 (10). Retrieved from http://www.cfp.ca/content/53/10/1712.full

[13] See Pesticide Toxicity Report (note 4 above), p. 7, Figure 1

[14] See IPM Plan, 1998. "Need for Plan and Policy." - "Many citizens are concerned about the amount and location of pesticide application within Calgary, and its associated health and environmental impacts" (p. 2).

[15] Canadian Association of Physicians for the Environment (CAPE) and Prevent Cancer Now. 2016. "Alberta Pesticide Survey Report." Prepared by Oraclepoll Research. Retrieved from https://cape.ca/wp-content/uploads/2018/03/2.Alberta-Pesticide-Survey-Report-September-2016.pdf

[16] Statistics Canada. 2017. “Age and Sex Highlight Tables, 2016 Census.” Retrieved from https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/hlt-fst/as/Table.cfm?Lang=E&T=12&Type=2

[17] See, for example, Mesnage, Robin and Michael N. Antoniou. 2017. “Ignoring Adjuvant Toxicity Falsifies the Safety Profile of Commercial Pesticides.” Frontiers in Public Health, 5 (361). Retrieved from https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5786549/

[18] Pest Control Products Act. 2002, current to November 20, 2018. See Section 16(2). Retrieved from https://laws-lois.justice.gc.ca/eng/acts/P-9.01/page-3.html#docCont

[19] Ecojustice. November 9, 2018. Letter to the Honourable Ginette Petitpas Taylor, Minister of Health. Retrieved from https://cape.ca/wp-content/uploads/2018/11/2018-10-29-edited-Nov-92c-2018-Ltr-to-Minister-of-Health-re-Glyphosate-Objection.signed.pdf