

Submission to City of Calgary
Standing Policy Committee on Community and Protective Services
June 7, 2017

Response and Recommendations concerning
Pesticide Toxicity Report CPS2017-0510

1. The Report should be amended to be more responsive to the direction of City Council's motion of November 7, 2016.

The Canadian Association of Physicians for the Environment (CAPE) notes that the City Council motion of November 2016 requested evaluation of pesticide toxicity in reference to products used in the City's IPM program. However, such information is absent from the Report. Although the Report indicates that 31 of the 35 pesticide products used by the City in 2016 are in the second-highest risk category (as set out in Alberta regulations), there is no list of what these pesticides are, nor any ranking of them by toxicity, nor any identification of which ones are prospects for discontinuation so as to achieve the goal identified in the motion -- "eliminating the more toxic pesticides from use on city land."

As to the Report's contention that pesticide evaluations can only be carried out by Health Canada's Pest Management Regulatory Agency (PMRA), it is stretching credibility to suppose that City Council's motion was asking for such a formal and detailed review of pesticides, which would require the conduct of laboratory-based toxicology studies, literature reviews, and assessments of neurological, endocrine and immunotoxicity impacts, among much else. A more common sense understanding is that Council was requesting a relative toxicity ranking of pesticides used by the City, guidance for which can be obtained from product labels and Material Safety Data Sheets.

CAPE suggests that the Report will be of greater assistance to City Council if it is amended to include the information requested in Council's motion.

2. The Report should be amended to acknowledge health evidence and to reflect such evidence in recommendations and proposals for change in pesticide use.

Although the Motion adopted by City Council in November 2016 directs that City Administration should "include members of the public who are health professionals or from health organizations as part of the review team," the resulting Report does not describe, summarize or outline what health concerns are associated with pesticide use. None of the seven key findings listed on page 1 of the report makes mention of health. The concept of "risk" is referenced in a number of places throughout the Report, but there is no account that would assist Council in understanding what these risks are with respect to pesticide exposures.

CAPE provided a letter in January 2017 highlighting a number of reviews that examined a total of more than 500 epidemiological studies of pesticide exposures. (Epidemiology can be understood as the branch of medicine that investigates the prevalence and distribution of diseases in selected populations.) This body of research determined that health risks associated with exposure to pesticides include adverse reproductive, neurological and respiratory outcomes that are particularly significant for children, pregnant women and newborns.

Adverse health impacts include increased risks for a range of physical and developmental conditions such as low birth weight and pre-term births in babies, deficits in cognitive and motor development in children, hormonal (endocrine) disruption, asthma and obstructive lung disease, birth defects, learning disabilities and other developmental deficits. 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.

Such evidence should be included in the Report because it provides a rationale for eliminating the more toxic pesticides from use in the City of Calgary's IPM program, consistent with the direction of City Council's November 2016 motion.

3. The Report should be amended to take account of limitations in the data and pesticide registration process used by the federal Pest Management Regulatory Agency (PMRA).

CAPE is concerned that the Report reflects over-confidence in the pesticide registration process administered by Health Canada's PMRA. CAPE's earlier letter noted serious concerns about PMRA processes identified by the federal Commissioner of the Environment and Sustainable Development (an officer of the federal Auditor-General's department) in a 2015 report. Others have also raised concerns about short-comings in the PMRA system.

CAPE believes that the PMRA over-relies on industry-supplied studies and fails to take sufficient account of population-based epidemiological research that considers the real-world effects of pesticide exposure on humans. For example, risks from cumulative exposure to more than a single pesticide are not adequately addressed. Gaps in data and critical flaws in the PMRA evaluation process mean that we cannot depend on Health Canada's assurances of pesticide safety, because the evidence that supports such claims is seriously deficient.

4. It is reasonable for decisions about pesticide use to reflect public interests and concerns.

There is strong public support in Alberta for action on cosmetic pesticides. In August 2016, a poll conducted for CAPE in partnership with several other organizations found that more than two-thirds of Albertans are concerned that pesticides pose a threat to the health of their children and their pets. Residents in Calgary were surveyed as part of this poll.

CAPE will be pleased to further assist the City of Calgary in its reconsideration of pesticide use. Thank you.

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