

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.

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