



Chairman Gian-Carra Carlo and members of the Standing Policy Committee of Community and Protective Services, June 7, 2017

RE: Pesticide Toxicity Report, CPS2017-0510

After a generation of Integrated Pest Management (IPM) in Calgary, as you consider pest control on Calgary lands we are disappointed that the re-examination of pesticide use in the present staff report does not reflect the information provided by *Prevent Cancer Now*, and contains inaccuracies.

Although Calgary is working on alternative weed control with goats, fostering edible plants and community gardens, and naturalization with less manicured turf, the current report is focused on pesticides. Here Calgary is less progressive, and this result of unadvertised consultation, not only fails to follow Council's direction to assess pesticide relative toxicities, it fails to detail pesticide use, defies logical thought and contains outright misinformation. I am writing to set the record straight on a few points.

Contrary to Calgary staff's reassuring claims, Health Canada's assessments are very limited. There is no federal facility for pesticide toxicity testing, and assessments are one-chemical-at-a-time paper exercises. The Commissioner of the Environment and Sustainable Development repeatedly criticized Health Canada's pesticide assessment process in 2015 as well as in 2008 and 2003. Please see attached our factsheet on pesticide assessment.

"Industry" influence on Calgary staff is obvious up front in the staff report, featuring the out-dated notion that "the dose makes the poison." Medical specialists and scientists have been raising alarm for decades that chemicals can affect hormone systems at very low doses, contributing to birth defects, developmental problems, harm to the nervous and immune systems, and cancers. Common pesticides can contribute to the same chronic diseases we see increasing in the young, with escalating costs hobbling our health care system and economy. This "endocrine disruption" is given little if any weight in federal chemical assessments.

Pesticides are not assessed in combination with other chemicals. In light of a meeting with Health Canada staff, a group of experts concluded that a recent Health Canada proposal for cumulative assessment of pesticides amounts to late-in-the-day baby steps that is unlikely to affect pesticide use.

Data on new pesticides is provided by pesticide companies, in confidential reports of experiments using doses far above environmentally relevant exposures. After decades on the market, academic researchers' reports of adverse effects of pesticides – peer-reviewed scientific studies – are often dismissed as being unreliable. Based on the open science, the World Health Organization's International Agency for Research on Cancer (IARC) concluded that several pesticides used by the City of Calgary may well cause cancer, but this was but a small bump in the road for the federal regulators. No federal bans are imminent. Indeed, bans are rare – Canada never even banned the notorious Agent Orange ingredient 2,4,5-T. The registration eventually lapsed as actions were taken by other countries around the world.

Painting their pesticide use as minimal, staff makes a misleading claim that the City uses hundreds of times less herbicide per hectare than homeowners. In fact, the 2013 Overview of Pesticide Sales in Alberta states intensity of use comparisons (active ingredient kilograms/hectare) between homeowners' application of the safer alternative corn gluten meal, that requires higher application rates, with the quantity of potent concentrated chemical herbicides used by the City is not relevant. As evidence indicates that the citizens are choosing least-toxic options, it is time for the leaders to follow.

After seven months of secretive study, Calgarians deserve better. Ultimately the misleading and ill-founded staff report illustrates why pesticides restrictions are needed. Ontario has a "white list" of least-toxic pest control options to protect even the most vulnerable.

As lilacs bloom, Canadians fortunate enough to be protected with pesticide restrictions again take a deep breath, thankful to enjoy floral fragrance rather than the stench of phenoxy herbicides. They are confident that their children, environment and waterways are safer. As Canada's largest city without these protections for its citizens, we firmly hope that it is time for Calgary to join the big leagues. Please do not hesitate to ask, if *Prevent Cancer Now* can be of any assistance.

Sincerely,

Meg Sears

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