

Recommendations regarding the Report on Pesticide Toxicity CPS2017-0510

for consideration by Calgary City Council at the regular meeting, June 26, 2017.

Per request by Councillor Colley-Urquhart at the

Standing Policy Committee of Community and Protective Services meeting, June 7, 2017.

Via email

Dear Mayor and Council;

As Council considers the important topic of protection of public health, particularly of children, from the use of pesticides, you require accurate information that addresses Council's original direction: to evaluate pesticide toxicity as part of the Integrated Pest Management Plan review, with the goal of eliminating the more toxic pesticides from use on city land; and to involve health professionals and health organizations.

To assist Council, *Prevent Cancer Now* recommends corrections to the staff Report on Pesticide Toxicity CPS2017-0510 (the Report); and that Council seizes this opportunity to join the most progressive Canadian jurisdictions to protect public health from toxic pesticides:

1. **Complete Information: The Report on Pesticide Toxicity should include a list of pest control products, quantities of use, and the health and environmental concerns associated with specific agents.** Council is faced with choosing how to control pests, given a range of both advantages and harms of various products and strategies.
2. **Complete Information: The Report should reference recent scientific information, including that submitted by health organizations.** For example, the Report references only the 2004 Ontario College of Family Physicians report, but omits that this was subsequently refined in two peer-reviewed publications (1)(2), and non-cancer effects (e.g., neurological) were updated in 2012 (3). Among numerous examples, the International Agency for Research on Cancer (IARC) has also updated findings that several pesticides used by Calgary are possible or probable human carcinogens (4).
3. **Correction: Health Canada's Pest Management Regulatory Agency (PMRA) does not assess cumulative or low dose effects, and does not conduct independent testing.** Statements to this effect in the Report should be corrected. This was confirmed to *Prevent Cancer Now* in a 2017 meeting with PRMA staff, and in a recent submission to a PRMA consultation on precisely this topic (5). The need to address these failings was highlighted in a June 2017 report of the Parliamentary Committee examining chemical assessment (6). Meanwhile, physicians and scientists indicate that low dose and cumulative effects are feeding chronic disease and impairing the potential of our children (e.g., (7)(8)(9)).
4. **Clarification and Correction:** The comparison indicating that citizens use larger quantities of pesticides than the City is spurious and misleading. Alberta pesticide sales reports indicate that citizens are largely using corn gluten meal as opposed to the chemical pesticides that the City relies upon. This is confirmed by the limited data in the Report, because the application rate is much greater than permitted for synthetic chemical products.

5. **Provision of Key Information:** The Report references a “Charter for IPM review,” but this is not reproduced. Council and the public require this apparent “playbook” for the review.
6. **Next Steps – Best, Least-Toxic Options:** Place a moratorium on use of pesticides that are not included on a “white list” of pesticides. *Prevent Cancer Now* recommends that this measure be put in place City-wide, but at a minimum on and surrounding sensitive properties such as playgrounds/tot-lots, schools, child care establishments, hospitals, etc., as well as within 30 horizontal metres of water bodies and within 250 horizontal metres of water intake, per provincial regulations.
7. **Next Steps – Continued Involvement of Health and Environment Experts:** Use of chemicals that are designed and broadcast for their toxic effects will always be a matter of public health. *Prevent Cancer Now* and associated scientists and physicians request to be kept abreast of this file and are grateful for opportunities to be involved.

We thank you for your consideration, and wish Calgary City Council every success working for public and environmental health. Please do not hesitate to contact us if we can be of any assistance.

Sincerely,

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References

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