



The Honourable Jane Philpott  
Federal Minister of Health  
House of Commons  
Ottawa, Ontario K1A 0A6  
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February 12, 2016

Dear Minister Philpott:

**Re: The use of Chlorpyrifos (Dursban) by the City of Edmonton**

The **Canadian Association of Physicians for the Environment (CAPE)** is a national, non-profit organization that works to promote human health by protecting the environment. We have approximately 6,000 members across the country and are directed by a Board composed mostly of physicians. For 22 years, we have been conducting research, education and advocacy on environmental health issues.

**Pesticide Free Edmonton** is a volunteer-run grassroots organization that lobbies for the protection of human health and the environment through the reduction of pesticides. The group was started about 20 years ago and consists of doctors, gardeners, biologists and anyone who cares about the effect of pesticides.

**Prevent Cancer Now** is a Canadian national civil society organization including scientists, health professionals and citizens working to stop cancer before it starts, through research, education and advocacy to eliminate preventable causes of cancer.

We are writing to ask for your assistance with the resolution of a health issue of concern to our members in the City of Edmonton. Apparently, Edmonton uses two products with the active ingredient, chlorpyrifos, to control mosquitoes in and around the City. In these cases, it is being used to control mosquitoes as a nuisance, not as a vector for a public health concern such as West Nile Virus. We understand that these products have been sprayed in at least one park several times inside the City and in rural areas surrounding the City. It is being sprayed (Pyrate) and applied in granular form (Dursban) to control nuisance mosquitoes.

Chlorpyrifos was recently mentioned in the report, **Pesticide Safety**, released by the Federal Commissioner of the Environment and Sustainable Development as an example of a pesticide for which re-evaluation has been unacceptably prolonged. On page, 14 of the report, it is noted that the re-evaluation for chlorpyrifos, which was initiated in 1999, is scheduled for completion in 2020. The Commissioner's report also indicates that the Pest Management Regulatory Agency (**PMRA**):

- discontinued many residential uses of chlorpyrifos in 2002;
- found the pesticides to be acutely toxic to a wide range of organisms including mammals, birds, fish, aquatic invertebrates and honeybees;
- proposed the cancelling of its use on many crops in 2003; and

- reversed its cancellation for all of these crops in 2007 because of a “lack of alternative pest control products”.

Many people believe that chlorpyrifos should be banned from use because of the adverse impacts it presents to human health. In 2014, 50 environmental health scientists and health care professionals submitted comments to the US Environmental Protection Agency (**EPA**) expressing strong support for the EPA’s Proposal to Revoke Chlorpyrifos Food Residue Tolerances (Docket ID EPA-HQ-OPP-2015-0653) because the EPA’s own Revised Human Health Risk Assessment on Chlorpyrifos (2014) identified chlorpyrifos as a powerful developmental neurotoxicant that can cause brain damage to children with exposures to very low doses during critical windows during pregnancy and early postnatal life ([http://docs.nrdc.org/health/files/hea\\_16010401a.pdf](http://docs.nrdc.org/health/files/hea_16010401a.pdf)).

The citizens of Edmonton have raised their concerns about the continued and liberal use of chlorpyrifos in and around their city with city councillors, the provincial department of the environment, and staff in the PMRA, to no avail (<http://edmontonjournal.com/news/local-news/mosquito-fight-puts-restricted-insecticide-near-homes-natural-areas>). Our members who are active in the local group, Pesticide Free Alberta, have been recommending Vectobac as a safer alternative. Vectobac is a bacteria-based insecticide that is being used by many cities with a similar climate such as Grand Prairie.

We are asking you as the Minister responsible for the PMRA to revoke the registration of Dursban, stop the use of chlorpyrifos for mosquito control in the City of Edmonton, and protect the health of residents in that City. We would welcome the opportunity to speak to you directly about this concern.


Yours truly,



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