



January 19, 2018

Mayor Don Iveson, Chair, and Members of the  
City of Edmonton Audit Committee:

**Re: City Pesticide Use Audit (17428)**

On behalf of the Canadian Association of Physicians for the Environment (CAPE), I am writing for the following purposes:

- to endorse the recommendation of the Office of the City Auditor that the City of Edmonton should “update the *Integrated Pest Management* policy to improve clarity on pesticide use, justification and address the use of pesticides on non-City property;”
- to request that health-related groups be consulted in the course of such a review and that health evidence be taken into account in decisions around pesticide use; and
- to offer information and support to assist the City in carrying out the review.

CAPE members have been working to reduce health risks associated with exposure to pesticides for more than 20 years. As evident in a large body of epidemiological studies, these risks include a range of adverse reproductive, neurological and developmental outcomes that are particularly significant for children, pregnant women and newborns.

CAPE has supported implementation of cosmetic pesticide regulations in Ontario, Manitoba, New Brunswick, and Newfoundland and Labrador, and has participated in Health Canada consultations on neonicotinoids, glyphosate-based herbicides and other pesticides. We have worked constructively with municipal and provincial governments, health agencies, medical officers of health, physicians, researchers, academics and community organizations.

In 2016, following a study of pesticide regulations in cities and provinces across Canada, CAPE produced a policy report identifying best practices aimed at pesticide reduction and protection of communities from pesticide health risks. In the course of our work, we have also learned that the federal approval process for pesticides, carried out by the Pest Management Regulatory Agency of Health Canada, has serious gaps and flaws that justify a precautionary approach to pesticide use in the interests of public health.

CAPE appreciates the opportunity to contribute positively to the review of the City’s IPM program and looks forward to assisting in the development of an approach that provides publicly acceptable levels of pest control at reasonable cost, while protecting the health of city residents and, in particular, children’s health. Thank you.

Yours truly,

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Pesticides Director  
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