



Honourable Rochelle Squires
Minister of Sustainable Development
Room 344, Legislative Building, 450 Broadway
Winnipeg, MB R3C 0V8

June 1, 2018

Dear Minister Squires:

We are writing today on behalf of the Canadian Association of Physicians for the Environment (CAPE) to express strong support for Manitoba's current ban on cosmetic uses of pesticides. We worry about what pesticides are doing to our children. From a human health perspective, we believe it would be highly undesirable for the Government to weaken the pesticide restrictions that were implemented in 2015.

CAPE strongly advises against changes that would permit licensed pesticide applicators to use currently restricted products. Such a move would once again make lawns, parks, boulevards and other green spaces into sources of pesticide exposure, defeating the goal of reducing human exposure to cosmetic pesticides. If the Government adopts such an approach, children in Manitoba will be harmed.

Children are most at risk because of their relatively large body surface-area-to-weight ratio, their long life expectancy (for problems to develop), and simply the fact that they are much more likely to enjoy rolling around in the grass. Their dangers of exposure include increased risks of low birth weight and pre-term births in babies, deficits in cognitive and motor development, hormonal (endocrine) disruption, learning disabilities and other developmental deficits, and both adult and childhood cancers. In many studies, the harmful effects noted in children were related to the exposure of their mothers during pregnancy or to children's exposure at a young age. When cosmetic pesticides are a source of such exposures, these are preventable harms.

The current ban represents sound, science-based public policy. Independent, peer-reviewed evidence has established that serious health risks are associated with human exposure to chemical pesticides. Epidemiology is the branch of medicine that investigates the prevalence and distribution of diseases in selected populations. We provide references (below) to four systematic reviews which, taken together, report on over 500 health studies – all highlighting the risks of pesticide exposure.

It would be comforting if Canadians could depend on federal regulators to ensure that pesticides allowed for sale and use in this country will not harm our health or environment. Such is not the case. In evaluating pesticides, the Pest Management Regulatory Agency (PMRA) relies heavily on industry-supplied studies and does not take sufficient account of the real-world effects of pesticides on human populations. Risks from pesticide exposures through multiple pathways and risks from combined exposures to several chemicals, for example, are not well addressed in the PMRA process. Because of gaps in data, limitations in the applicability of animal testing, the lack of independent peer review of industry studies and other critical deficiencies, the PMRA's flawed and inadequate evaluation process is not reliably health-protective.

In affirming our support for Manitoba's current legislation, we note that hundreds of communities across Canada have successfully adapted to restrictions on toxic pesticides and are enjoying beautiful lawns and

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gardens and safe play spaces that don't endanger the health of residents. Cities and towns in Ontario, Nova Scotia, Quebec and elsewhere provide publicly acceptable levels of weed control at reasonable cost, while protecting the health of people and, in particular, children's health. We note that toxic pesticides have hidden costs, which include the cost of doctor visits, tests, medications, hospitalizations and treatment of illnesses and developmental deficits associated with pesticide exposure.

Commendably, the effect of Manitoba's existing law has been to reduce environmental and health risks by reducing exposure of people, pets, wildlife and pollinating insects to chemical pesticides used for non-essential purposes. Seven Canadian provinces have enacted bans on cosmetic uses of pesticides. No province has subsequently opted to loosen such restrictions.

CAPE is pleased to offer assistance to you and your department as you consider the status of the current provincial ban on cosmetic pesticides. In the interests human health and the natural environment, we strongly urge that the existing law be maintained. Thank you.

Yours truly,

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Systematic Reviews of Pesticide Health Studies

- Bassil K, C Vakil, M Sanborn, DC Cole, JS Kaur, KJ Kerr. 2007. "Cancer Health Effects of Pesticides – Systematic Review." Canadian Family Physician. October 2007. 53 (10). Online: <http://www.cfp.ca/content/53/10/1704.full>
- Chief Public Health Office, Prince Edward Island (PEI). 2015. "Pesticides and Human Health." Prepared by, Carolyn Sanford, DVM, PhD, David Sabapathy, MD, MBA, MSc, PEng, FRCPC, Heather Morrison, MD, MPhil, DPhil, CCDP(EM), and Katherine Gaudreau RN, BScN, MSc. Online: http://www.gov.pe.ca/photos/original/cphs_pesticipt1.pdf
- Ontario College of Family Physicians (OCFP). "2012 Systematic Review of Pesticide Health Effects." 2012. Prepared by Marg Sanborn, MD, CCFP, FCFP, Kate Bassil, MSc, PhD, Cathy Vakil, MD, CCFP, FCFP, Kathleen Kerr, MD, MCFP, Dip. Env. Health, and Kelsey Ragan, MPH. Online: <http://ocfp.on.ca/docs/pesticides-paper/2012-systematic-review-of-pesticide.pdf>
- Sanborn M, Kerr KJ, Sanin LH, Cole DC, Bassil KL, Vakil C. 2007. "Non-cancer health effects of pesticides – Systematic review and implications for family doctors." Canadian Family Physician. October 2007. 53 (10). Online: <http://www.cfp.ca/content/53/10/1712.full>

*The Canadian Association of Physicians for the Environment (CAPE)
is the only doctor-directed national, non-profit organization in Canada dedicated to
improving human health by protecting the environment.*