



October 17, 2018

Honourable Rochelle Squires
Minister of Sustainable Development
Legislative Building, Winnipeg

Re: Manitoba legislation on non-essential uses of pesticides

In light of concerns expressed by some Manitoba municipalities, I am in touch with you today on behalf of the Canadian Association of Physicians for the Environment (CAPE) to share a report entitled, "Municipal Weed Control: Lessons from Ground Zero," which was released last week.

This is a report on weed control methods and materials currently in use in six municipalities across Canada, all of whom operate under restrictions imposed by bans on non-essential uses of toxic pesticides.

In brief, on the basis of interviews with parks managers in these cities, the study found that:

1. Satisfactory and publicly accepted levels of weed control can be achieved at reasonable cost without the need for the more toxic herbicides.
2. Cities that operate under cosmetic pesticide restrictions allocate available resources to turf maintenance through practices such as mowing, aeration, overseeding, fertilization and top-dressing.
3. Even sports fields (one of the more challenging categories of green space) are being maintained in attractive and functional condition through the above techniques that focus on building healthy turf.
4. No city in the study has opted to simply substitute allowable weed control products for banned ones. Weed control budgets have not risen exponentially.
5. Managers observe that, while some complaints are received (for example, about dandelions in the spring), a substantial majority of residents appear supportive of weed control methods that do not expose people to toxic pesticides in city parks, sports fields and public spaces. Parks officials in these cities feel that residents accept that landscapes may contain some naturally occurring weeds. At the same time, the program managers say they are well able to maintain the pleasing appearance of priority (highuse, high-visibility) spaces without resorting to the banned pesticides. In practice, then, weed complaints are reported to be "minimal."
6. Significantly, a consensus view of key informants in the study is that they would not wish to use the more toxic pesticides, even if allowed to do so, because the banned products are just not needed.



The full report, with more description and detail on the above points, is published on CAPE's web site: [Municipal Weed Control: Lessons from Ground Zero.](#)

I would like to add that CAPE respects the perspective of the Association of Manitoba Municipalities in this matter (even if we disagree), and we also appreciate that your government is taking time to weigh the various factors in evaluating current policy. In conducting this assessment, we strongly believe that human health must be a priority consideration.

We would emphasize that exposure to non-essential pesticides poses serious risks to human health, creates additional costs for the province's health care system, and affects the lives of those who struggle with illnesses and conditions associated with such pesticide exposures. (A previous [letter from CAPE, dated June 1, 2018, provided further detail concerning human health risks associated with exposure to pesticides, drawing on conclusions from peer-reviewed epidemiological studies.](#))

We also note that the Chief Provincial Public Health Officer for Manitoba has recommended that "if pesticides are not needed, they should not be used." (Please see [statement.](#))

Based on the reported experiences of parks managers in the field, it is evident that effective weed control methods and materials are available (and actively in use across the country) to maintain both the protection of human health and the function and appearance of parks and green spaces without the need for "cosmetic" pesticides.

We hope that the information and support provided by our Association will be helpful to your government in making sound public policy decisions to limit unnecessary human exposure to toxic pesticides. CAPE believes that the provisions in Manitoba's existing legislation should remain in place.

Thank you again for your consideration.

Sincerely,

Randall McQuaker
Pesticides Director Canadian Association of Physicians for the Environment (CAPE)