



August 17, 2022

Edmonton City Council
Office of the Mayor and Councillors
2nd Floor, City Hall
1 Sir Winston Churchill Square
Edmonton, AB T5J 2R7
Amarjeet.Sohi@Edmonton.ca
Cc: City.Clerk@edmonton.ca and all members of council

Re: 7.4 - Elimination of Cosmetic Pesticide - Community Outreach, Public Education, Operational and Enforcement Resources

Dear Mayor and Members of the Edmonton City Council,

Thank you for the opportunity to address you and for considering the Canadian Association of Physicians for the Environment ([CAPE](#))'s point of view regarding **7.4 - Elimination of Cosmetic Pesticide - Community Outreach, Public Education, Operational and Enforcement Resources**. CAPE is well-positioned to address this issue, given our organization's expertise and history of involvement in pesticide issues, including past municipal pesticide ban processes as they have unfolded across the country.

Undoubtedly you will have heard from other stakeholders and interested parties. We recognize that this likely includes well-organized industry representatives. Historically, industry lobbying has led to the "manufacturing of doubt" about the adverse health outcomes of pesticides as they support the ongoing use of their products. Unfortunately, ill health among people exposed to pesticides is widely reported and is well documented in the scientific literature.

Industry stakeholders' activities and arguments also create the impression that a pesticide ban is controversial or difficult. However, bans are not complex; they are popular with and have the support of most community members, as reflected in polls. Furthermore, compliance is not usually an issue once a ban has been implemented.

Pesticide elimination programs are critical in shifting towards a framework that enshrines community health as an essential priority. Furthermore, pesticide bans are necessary as cities change to an economy that promotes citizen wellness and quality of life and respects people's

right to a healthy environment, including their right to live free from pesticide drift. The experience of other [cities where bans have been enacted illustrates](#) that they can be achieved without hurting small businesses or adding to municipal costs.

CAPE supports your efforts to pursue the elimination of cosmetic pesticides in Edmonton and wishes to make your journey as easy as possible. Being late adopters of a pesticide ban means you can cost-effectively benefit from work completed elsewhere.

CAPE and allied researchers and policy experts have over the years gathered and documented a vast body of evidence that should give you confidence in the decision to eliminate cosmetic pesticides. Enclosed is a document containing important information and resources supporting your efforts.

I appreciate your consideration and am encouraged by your efforts to improve your community's health and well-being.

Sincerely,



Jane McArthur
Toxics Program Director
Canadian Association of Physicians for the Environment (CAPE)

Attachment: Statement of Support for a Cosmetic Pesticide Ban By Edmonton Council



August 17, 2022

Statement of Support for a Cosmetic Pesticide Ban By Edmonton Council

The Canadian Association of Physicians for the Environment (CAPE-ACME) welcomes the opportunity to submit this document to the members of the Edmonton City Council in support of a ban on cosmetic pesticides in Edmonton. We have organized many resources in this one document (*some as hyperlinked in-text references, and others in a list of resources below*) and hope that you can additionally offer this document to your administration.

[CAPE-ACME](#) is a national physician-led organization working at the intersection of health and environment. As physicians and other health professionals with a record of research and advocacy around evidence-based and evidence-informed concerns relating to critical environmental health issues in Canada, CAPE has a long history of activity with regard to pest management and pesticide regulation to protect the environment and human health. We were involved in the successful cosmetic pesticides bans in other jurisdictions and more recently have been participating as a stakeholder and steering committee member in the [PMRA Transformation](#) Agenda [engagement opportunities](#) in the lead up to the forthcoming legislative review of the PCPA.

CAPE applies a planetary health lens as it engages in critical issues related to human and environmental health. As such, there are several fundamental principles that apply to our work and our advocacy that prioritizes the health of humans and the environment. Many of the points included herein are those that we have articulated in other submissions and they are equally as applicable here as we encourage members of the Edmonton City Council to embrace a framework that centres on wellbeing - a framework that encompasses human, environmental, and economic health.

Edmonton is in the enviable position of having the benefit of undertaking this process in an efficient and cost-effective way, by building on the examples of the many other jurisdictions that have similarly banned cosmetic pesticides.

The following documents include sample bylaws and educational materials for citizens. Richmond's website, for example, includes a copy of their bylaw as well as information on enforcement, and alternative practices.

- [City of Richmond Pesticide Use Control Bylaw](#)
- [City of Montreal officially adopts bylaw restricting the use of pesticide products - Retail Council of Canada](#)
- [Summary of Pesticide Regulations across Canada \(Federal, Provincial and](#)

[Municipal\): Urban Landscapes](#)

Guiding Principles and Goals for this Feedback

For human and environmental health and safety, the control of pests should centre on fundamental principles of [public health](#) & environmental protection including the application of the [precautionary principle](#), harm or hazard prevention, health promotion, and [environmental justice](#).

The assumption of the protection of human health and safety should become the core goal of maintaining **public health as a social good**. The phrase public health was [coined in the 19th century](#) to distinguish between actions governments should take as opposed to private individuals to preserve and protect people's health. Clarity on this distinction is necessary. Individuals cannot and should not be bearing the responsibility of making personal "choices" about potentially harmful exposures to pesticides when doing so often is largely out of their control whether due to lack of transparent information about risks or the inability to prevent exposures in their food, water, communities, or workplaces.

The [precautionary principle](#) states that "when an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically." The approach is illustrated in the classic story of [Dr. John Snow's](#) recommendation to officials in London, U.K., in 1854 to remove the Broad Street water pump handle to stem a cholera outbreak. When the pump handle was removed, the number of new cholera cases dropped dramatically. This approach -- with the prevention of harm as fundamental — is equally applicable to the ubiquitous use of and unwitting exposure to pesticides.

Environmental justice principles were first [outlined in 1991](#) by delegates to the First National People of Color Environmental Leadership Summit in Washington DC. Among others, the principles include demands that public policy be based on mutual respect and justice for all peoples, free from any form of discrimination or bias; affirming the right of all workers to a safe and healthy work environment without being forced to choose between an unsafe livelihood and unemployment; protecting the right of victims of environmental injustice; and considers governmental acts of environmental injustice a violation of international law, the Universal Declaration On Human Rights, and the United Nations Convention on Genocide.

Implementing [UNDRIP](#) and the recommendations of the [Truth and Reconciliation](#) Commission requires that we **apply traditional Indigenous knowledge** and evidence-informed approaches. Indigenous scientist Dr. Robin Wall Kimmerer [reminds us](#) we have the courage to "refuse to participate in an economy that destroys the beloved earth to line the pockets of the greedy, to demand an economy that is aligned with life, not stacked against it."

There are inherent **problems with the risk assessment approach** used by many governments when contrasted with alternatives assessments within a hazard prevention paradigm.

Alternatives assessments provide a realistic framework for chemical assessment with a reliance on assessing hazards and exposures, as opposed to probabilities of risk. The distinction between these paradigms is clearly articulated by toxicologist Dr. Margaret Whitaker [here](#):

“Risk assessment is a powerful tool to assess the likelihood of harm, and if misused, has the potential to promote the continued use of substances that at sufficient levels of exposure may result in adverse human health and/or environmental effects. In contrast, an alternatives assessment begins with a different end game, and that is to inform the selection of less hazardous chemicals and materials so that the concept of acceptable risk is eliminated from the equation altogether.”

Correspondingly, **alternatives to pesticides for pest control** are well-established and fit within a planetary health framework that give priority to the critical importance of biodiversity, organic approaches, as well as “lower risk” or “minimum risk” substances such as are outlined in the [US EPA](#) document.

If Edmonton is committed to **science-based action**, then it should do so in keeping with biologist Dr. Mary O’Brien’s argument that “[being a scientist means taking sides](#)” and further that scientific skills “applied to these risk assessments generally does not serve infants, residents, workers...nearly as well as alternative assessments.” **Taking the side of human health** is our recommendation for the members of the Edmonton City Council.

Context for this letter of support

We are living in an existential crisis as the climate emergency escalates. No planning of future legislative, regulatory or policy actions in Canada can ignore this fact. Too often, we falter in approaches to solving critical problems by failing to see the bigger picture, suffering from siloed thinking and seeing variables as independent instead of interdependent and fundamentally connected. Pesticides can negatively impact soil biodiversity, which then can impact its carbon storage and sequestration [abilities](#).

Climate change, toxic exposures, and environmental injustice are not separate phenomena. We must connect the dots and bring the bigger picture of **planetary health** into view as is done in [The Lancet's manifesto](#) for public health. The vision is “a planet that nourishes and sustains the diversity of life with which we coexist and on which we depend.”

Furthermore, it is critical to conceptualize the [determinants of planetary health](#) from a perspective that embodies Indigenous-specific methods of knowledge gathering and that recognizes Indigenous Peoples’ sovereignty has been adversely impacted by increasing effects of environmental change, including climate change, pollution, and threats against their land and water rights.

Authors of a [recently published study](#) conclude chemical pollution, including pesticides, has now crossed a “planetary health boundary” — the limits of nature to support human activity — and argue that stronger regulation and a cap on chemical production and release are necessary, as are carbon targets to end greenhouse gas emissions. The climate emergency requires solutions by way of swift action. Governments must dramatically [reduce CO2 and greenhouse](#)

[gas emissions](#) through integrated policy measures. We cannot continue to allow our [communities to be used as science labs](#).

Governments must take the approach that progress in addressing climate change and environmental health, justice and economics are the same goals, achievable with interconnected strategies. A well-being economy instead of a GDP-focused framework is needed, wherein just transitions for affected workers and communities are prioritized through a health lens and a quality of life framework. Just as targets have been set for the reduction of greenhouse gasses, so too should targets be set and met on pesticide use, such as the EU's goal of 50% reduction in pesticide use by 2030.

Decades of use of pest control products have provided us with significant evidence about the adverse human health and environmental impacts of pesticides. With the introduction of agricultural chemicals and mechanization of farm equipment after the second world war, causal negative health outcomes for workers and communities increased. Although pesticides were labour-saving and a boon to production, there were and are substantial human health costs. The "real world data" cannot be overlooked.

For example, the families of [Ontario](#) farmers who used glyphosate experienced increased miscarriages and premature births. A [case-control study](#) in the agricultural area of Essex and Kent counties in Ontario found that breast cancer risk was elevated even among women who ever lived or worked on farms. [Studies](#) document pesticides in the bodies of pregnant women, in amniotic fluid, in the umbilical cord, and in mother's milk. In [Quebec](#), pesticides were found in 98.7% of children tested, and [research](#) shows that the long-ago banned DDT and its metabolites are still detectable in the breast milk of Inuit women in the North. Associations between exposure to pesticides and their contribution to cancers, reproductive problems, [non-Hodgkin lymphoma](#), [Parkinson's disease](#) and more can no longer be tolerated. These are not acceptable risks to pregnant people, cancer patients, or anyone else. Albertans are worried about the health impacts of pesticides on their children and pets, as evidenced in a [2016 survey](#) in which two third of respondents expressed concern.

Given the human health harms, and soaring costs of agricultural inputs, some farmers' groups are urging governments to fund independent agricultural research, including research into affordable organic methods as well as to provide assistance to farmers making the transition into organic production. Farmers will benefit from a rapid transition to a low-inputs model, particularly if they seek to build healthy, carbon sequestering soils. Albertans and Edmontonians can similarly benefit from such an approach.

We have so much information about the harm done by pesticides, the benefits of alternatives, the problem of environmental justice, and the overreach of industry into government decision-making that we know that what we are eating and drinking is unlikely to be safe. Any and all actions and policies relating to pesticides must place human and ecological health as the utmost priority.

Resources:

[Cosmetic Pesticide Use: Myths vs. Reality](#)

[Joint Submission re: Consultation on Targeted Review of the Pesticide Control Products Act \(June 2022\)](#)

[The human health impacts of pesticides are not ‘acceptable risks.’ Here’s how we can fix pesticide management | The Star](#)

["Municipal Weed Control: Lessons from Ground Zero"](#)

[5.Calgary-Pesticides-Let-Dec2016-1.pdf](#)

['Action is needed': Montreal unveils new bylaw banning pesticides](#)

[Alberta Pesticide Survey Report \(September 2016\)](#)

[CAPE Pesticides Scorecard](#)

<https://cape.ca/wp-content/uploads/2018/03/1.Doctors-say-Too-many-Canadian-children-lack-protection-from-cosmetic-pesticides-Aug-23-2016.pdf>

[Let’s Protect Alberta Kids from Toxic Pesticides - CAPE](#)

[Manitoba-Pesticides-Article-October-18-2018.pdf](#)

[Opinion: Time to ban cosmetic pesticides in Edmonton](#)

[Report: Cosmetic Pesticides – Provincial Policies & Municipal Bylaws: Lessons Learned & Best Practices](#)

[Strong Support for Ban of Cosmetic Pesticides in Alberta - CAPE](#)

[The human health impacts of pesticides are not ‘acceptable risks.’ Here’s how we can fix pesticide management | The Star](#)

[VanderLinden-TPH-AHS-Pesticides-May-2017.pdf](#)

[Weed Crisis Averted: CAPE Confirms Toxic Pesticides Not Needed](#)

[Why pesticides don’t mean a healthy lawn – Green Ottawa](#)

Understanding how industry manufactures doubt:

[Distract, delay, disrupt: examples of manufactured doubt from five industries](#)

[Doubt is Their Product - David Michaels - Oxford University Press](#)

[Manufacturing Uncertainty: Contested Science and the Protection of the Public's Health and Environment | AJPH](#)

[Merchants of Doubt](#)

[The fact of uncertainty, the uncertainty of facts and the cultural resonance of doubt | Philosophical Transactions of the Royal Society A: Mathematical, Physical and Engineering Sciences](#)