

Cosmetic Use of Pesticides Consultation 2016:  
Survey questions and information for possible responses

**Survey question 1. What is your understanding of the regulation prohibiting the use of cosmetic pesticides? What other approaches should be developed to increase public awareness and understanding of the regulation?**

**Response:**

The current law prohibiting the non-essential use of cosmetic pesticides is an important tool for protecting the health of children, pets and other vulnerable members of our communities.

The province could increase public awareness and understanding of the law by:

- i) Continuing to maintain pesticide-free lawns at the Legislative Buildings, leading by example on any lawns and gardens that are maintained by the province;
- ii) Promoting and/or rewarding gardeners and municipalities who maintain beautiful, pesticide-free lawns and gardens (David Suzuki Digs My Garden is a great example of this);<sup>1</sup>
- iii) Offering funding to non-profit organizations that are doing an excellent job informing the public about safe, affordable alternatives to pesticides, such as the Manitoba Eco Network's Organic Lawn Care program.
- iv) Providing comprehensive related information on its website

**Survey question 2. How has the regulation affected you as an individual, a business, an organization or as a representative of a municipality?**

**Response:**

I am pleased to know that this regulation is in place, and contributing to the health of my family and community by limiting our exposure to potentially harmful pesticides. Noting the growing body of evidence, documented by organizations such as the Ontario College of Family Physicians<sup>2</sup>, which indicates that pesticides are linked to health effects such as cancers in children and adults, deficits in mental and physical development among children, and adverse reproductive effects. I know that my family and community are benefiting from the reduced use of these non-essential pesticides while the law is in place.

**Survey question 3. Currently, some restricted pesticides are still available for certain uses. Do you think that the restrictions on the sale and use of cosmetic pesticides are appropriate?**

**Response:**

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<sup>1</sup><http://www.davidsuzuki.org/digs-my-garden/about/>

<sup>2</sup><http://ocfp.on.ca/docs/pesticides-paper/2012-systematic-review-of-pesticide.pdf>

Yes, the restrictions on the sale and use of cosmetic pesticides are appropriate. If anything, the restrictions should be extended to include gardens, shrubs and trees as well as lawns.

Consideration should be given to expanding the ban to include golf courses, as there are alternatives to maintenance with the banned products. Golf course maintenance is not an 'essential use.'

**Survey question 4. Do you support the current restrictions on the cosmetic use of pesticides or in what ways would you suggest the regulations be expanded or reduced?**

**Response:**

Yes, I support the current restrictions on the cosmetic use of pesticides, and would like to see the law expanded so that the Canadian Cancer Society (CCS) can add Manitoba to their list of provinces that have appropriate legislation for reducing public exposure to pesticides (currently only Ontario and Nova Scotia meet CCS standards).

Our law could be improved by extended to cover gardens, shrubs and trees as well as lawns. There could also be greater oversight at the point of sale, including education for retail staff and random annual inspections.

Manitoba's law is addressing the gaps in Health Canada's Pest Management Regulatory Agency (PMRA) review process, including the following inconsistencies:

1. The PMRA primarily relies on animal toxicology studies whereas CCS reviews population-based, epidemiological research to assess the real-world effects of pesticide exposure.
2. The PMRA relies on evidence provided by pesticide manufacturers which poses a conflict of interest. On the other hand, CCS looks at third party, peer-reviewed research.
3. The PMRA evaluates pesticides under ideal circumstances, where pesticides are applied for approved uses only, label directions are followed and protective equipment is used as recommended. It is unclear how the PMRA assesses hazards of real-life exposure - for instance, if the aforementioned are not adhered to.
4. The PMRA evaluates the efficacy of individual active ingredients but not chemicals in combination. This poses a problem both because pesticide products are formulas of active and inert ingredients and because humans may be exposed to multiple pesticide products or other toxicants at the same time.

5. Finally, the result of cumulative exposure to pesticides is not assessed by the PMRA. The epidemiological studies evaluated by CCS looks at persistent exposure on the job or in the home.<sup>3</sup>

**Survey question 5. Do you have any other comments or suggestions you would like to provide us on cosmetic pesticide use in Manitoba?**

**Response:**

1. Those in favour of widespread use of cosmetic pesticides argue that these chemicals are necessary if we want to maintain beautiful, manicured lawns and gardens. There are several mistaken assumptions embedded in these opinions:

- i) Dandelions, clover, and other “weeds” are unsightly.
- ii) Pesticides prevent weeds.

A basic knowledge of soil microbiology and botany can be used to challenge these opinions:

i) A weed is just any plant that is not wanted in a given location. This is a matter of opinion, not scientific fact.

ii) Pesticides actually perpetuate the undesirable soil conditions that weeds thrive in; they kill the microorganisms that create healthy soil, making us dependent on pesticides and fertilizers. Most “weeds” are indicator plants: they tell us what’s wrong with our soil. Dandelions let us know that the soil is compacted, low in calcium, high in potassium, and high in acidity.<sup>4</sup> There are safe, affordable ways of improving each of these soil imbalances; cosmetic pesticides only exacerbate them.

2. None of the questions in this consultation survey address the impacts of pesticides on the environment. A public poll conducted in 2013 already showed that 71% of Manitobans support a ban on cosmetic pesticides<sup>5</sup>. Any additional consultations should take into account independent, peer-reviewed research and the expertise of local and national leaders in environmental sustainability.

3. Before the pesticide ban was introduced in 2015, our province had one of the highest household usage rates of cosmetic pesticides in the country.<sup>6</sup> Even with the introduction of a ban, Manitoba's cosmetic pesticide legislation pales in comparison to other provinces. Canada lags far behind other countries in terms of restricted pesticide use: there are roughly 1,000 commercial pesticides sold in Canada that have been banned in other countries due to environmental and health concerns.<sup>7</sup>

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<sup>3</sup><http://www.cancer.ca/~media/cancer.ca/AB/get%20involved/take%20action/CosmeticPesticides-InformationBrief-AB.pdf?la=en>

<sup>4</sup><https://www.beyondpesticides.org/assets/media/documents/pesticidefreelawns/resources/Read%20Your%20Weeds-Organic%20Lawns.pdf>

<sup>5</sup><https://cosmeticpesticidebanmb.wordpress.com/2013/02/26/new-poll-shows-71-of-manitobans-want-lawn-pesticides-gone/>

<sup>6</sup><http://www.ecojustice.ca/wp-content/uploads/2016/09/Backgrounder-Busting-the-myths-about-cosmetic-pesticide-bans-September-2012.pdf>

<sup>7</sup><http://www.davidsuzuki.org/publications/downloads/2007/DSF-pesticide-poisoning.pdf>

4. Ontario's urban waterways showed a significant decrease in pesticide concentrations just one year after a pesticide ban was introduced.<sup>8</sup> With boreal forests and freshwater lakes that people travel internationally to visit, Manitoba should aim to be a leader in environmental protection.

Implementing a more comprehensive pesticide ban and educating people about safe and affordable alternatives to cosmetic pesticides would be an important step towards protecting this beautiful place that we call home.

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<sup>8</sup>[http://landscapeontario.com/attach/1295274330.MOE\\_Update - Aaron Todd.pdf](http://landscapeontario.com/attach/1295274330.MOE_Update_-_Aaron_Todd.pdf)