



January 9, 2020

Councillor Jeromy Farkas:

RE: CPS2019-1518 PEST MANAGEMENT POLICY

I am writing to ask for a motion to remove Item 7.3 Pest Management Policy CPS2019-1518 from the Consent Agenda of the Combined Meeting of Council, January 13, 2020 and to add it to Section 11.1 Agenda Items Selected for Debate for more fulsome discussion amongst Councillors.

This request is being made to ensure that Council is appropriately informed on this important issue of public and ecological health. Several circumstances have thwarted informed, comprehensive Council and public awareness.

Incorrect information posted on the City website lead external stakeholders to believe that in Quarter 4 2019 there would be another opportunity to review revisions made to the pest management policy prior to the Standing Policy Committee meeting on Community and Protective Services (CPS) on December 11, 2019.

The CPS agenda materials were not available for review to external stakeholders until the afternoon of Monday December 9, 2019 in contravention of the requirement to post active agendas three business days prior to a meeting's occurrence. Since external stakeholders had not been contacted for a year there was anticipation that material changes to the pest management policy might have occurred over the last twelve months especially considering legal developments in the United States, and bans on a number of products by the European Union.

A further request in late December 2019 to the Chair and Vice Chair of CPS to remove CPS2019-1518 from the Consent Agenda to Items for Debate was not acted upon as noticed in the current Council agenda.

As a result of the procedural issues noted above there is a desire for an informed and full discussion about a policy that affects the health of citizens, the soil, air, water, wildlife, pets and climate. Following is a number of questions to ask Administration should the opportunity be provided.

1. CPS2016-0825 directed Administration to evaluate pesticide toxicity “with the goal of eliminating the more toxic pesticides from use on City land. CPS2017-0510 directed Administration “to consider key stakeholder submissions to inform the update to the Integrated Pest Management Plan and Policy.” It can be questioned whether Administration failed to comply with the directives it was tasked under CPS-2016-0825 and CPS2019-1518 Pest Management Policy.

i How, in a measurable way(s), was health expertise incorporated in the new pest management policy?

ii Which of the more toxic pesticides have been eliminated from the City’s tool box (not including those pesticide products that defacto have been removed due to de-registration)?

iii How is input from experts in environmental management and organic landscaping evident in the pest management policy?

iv Why was the term “Integrated” dropped?

v Has the City not kept up with scientific advances in Integrated Pest Management sufficiently to ensure compliance with evolving federal and provincial policies, regulations and procedures?

2. Under the 1998 Integrated Pest Management Plan the principles found on Page 28 are strikingly similar to the new pest management policy:

1. Use and ecological approach to vegetation and pest management that strives to reduce reliance on pesticides as well as integrate preventative measures and alternative control technology;
2. Minimize the risk to human health and the environment;
3. Consider cost-effectiveness and operational feasibility;
4. Consider community values;
5. Take a leadership role by educating citizens and private landowners about, and promoting an environmentally-sound, integrated approach to pest management;
6. Apply IPM principles when planning, designing, constructing and renovating project;
7. Ensure accountability in pesticide use through a regular reporting system;

Why has it taken a process started in 2015 as a result of 311 dandelion complaints more than four years to come up with a new pest management policy, that is effectively status quo and does not differ substantially (despite Attachment #4) from the 1998 Integrated Pest Management Plan and Policy?

Where is the innovation in the City’s proposed pest management plan?

What makes this policy a “leading municipal strategy” in Canada “where residents connect with each other and live healthy active lifestyles”? Other municipalities (e.g., Halifax) and provinces (e.g., Quebec and Ontario) proscribe use of chemicals commonly used in Calgary.

Updating the language, greater verbosity and ambiguity and shifting elements or categories does not comprise the innovation stakeholders were hopefully anticipating after four years later in the process.

3. The first policy statement 1.1 (a) regarding human and ecosystem health is ambiguous and requires clarification.

*Is human health given top priority (“prioritized”) using least-toxic pest control methods or
is human health given top priority (“prioritized”) by achieving healthy, biodiverse, resilient, functioning ecosystems, however such ecosystems are achieved?*

4. Insect and bird species are on a precipitous decline threatening food security. Residues of domestically used pesticides are found in surface waters downstream of cities and towns in Alberta (Alberta Environment) and even in the water cistern at the City of Calgary Water Centre.

i With [10 weed species](#); [3 insects \(wasps, ants, the red lily beetle\)](#); [2 bird species \(geese, a protected species, pigeons\)](#); [4 animal species \(squirrels, beavers, mice, Northern Pocket Gopher, Richardson Ground Squirrel, voles\)](#); and [2 monitoring projects \(Elm Scale, Emerald Ash Borer\)](#) ; identified as pests or in the latter monitoring projects on the City website, what will it take for the City to exercise discipline in its use of least-toxic pesticides for species under federal or provincial legislation or to those species identified by a Health Authority as being legitimately harmful to human health?

ii What criteria is the City using to establish a pest species?

5. Policy Statement d) “Makes science-based decisions and actions” is narrowly focused on “pests” and is based on an outdated paradigm that the “dose makes the poison.” Importantly, experience establishing and maintaining resilient organic turf does not appear to be investigated. Growing healthy landscapes focused on fostering desired indigenous species is healthier for all species.

i How does the proposed policy plan to incorporate risk/harm from a variety of low-dose toxic exposures over time, to all ages and stages of human development, into its science-based decisions and actions?

6. The answer to Question 3 is not Health Canada or its agent the Pest Management Regulatory Agency. The [reasons are many why 100% reliance on HC and PMRA is folly](#); Vaping, Bisphenol A, breast implants and a host of now-banned older pesticides. Need one say more?

Will the City of Calgary branch out of its 100% reliance on Health Canada and PMRA (slow and reactive bureaucratic organizations) and consider respected, scientific peer-reviewed expertise in its decision making and actions?

7. The Monsanto Papers revealed that Monsanto influenced and manipulated scientific studies of glyphosate, and that glyphosate-based herbicides do indeed cause non-Hodgkin lymphoma. In excess of \$400 million have been awarded to plaintiffs suffering from cancer stemming from the use of and exposure to glyphosate. More than [18,000 plaintiffs](#) are suing Bayer-Monsanto relating to glyphosate. City Parks indicated in the December 11, 2019 CPS meeting that Parks will continue using glyphosate in its “box of tools.”

Is the City of Calgary prepared to risk a lawsuit should one come forward related to human health harms through the use of and exposure to glyphosate?

8. Under the 1998 Integrated Pest Management Plan there was ongoing stakeholder engagement through the Pesticide Advisory Task Force and the Environmental Advisory Committee. Public education occurred through the Parks-sponsored Healthy Yards program. Pesticide use reports (active ingredients, amounts, locations) were made publicly available. And the goal was to oversee and monitor pesticide use corporately across all business units. All three initiatives were disbanded, pesticide use reporting stopped mid-life through the 1998 IMPP and corporate oversight and monitoring across all business unit did not occur. In fact it was extremely difficult getting a list from Parks of pesticides used and amounts when asked to prepare an Evaluation of Pesticide Toxicity under CPS2016-0825.

i What assurances do we have under the new pest management policy and its implementation that stakeholder engagement, accountability and Transparency will not fizzle out or will the new pest management policy be part of a de-democratizing trend?

ii Why is it that one can go to the City's Open Data Portal and find out [where all the west-facing park benches are located in the City](#) to view the sunset but one cannot find out what pesticide products have been used, the amounts targets, locations and justifications?

9. It is stated, P. 5 Item 7.1 CPS-2019-1518 Financial Impact, that there will be no budgetary implications under the new pest management plan.

i How does Parks plan to carry out even the identified high priority strategies that require revision, updating or initiation without an impact on its budget and especially under curtailed budget cuts?

ii Will operating within the current budget lead to reliance on so-called “efficient and economic” decision-making at the expense of long-term

consideration externalities including harmful human and environmental health impacts?

10. Like it or not, the City of Calgary is a role model for its citizens.

i Without restrictions on pesticide use to those pests legislated under Federal or provincial legislation for control or eradication using least-toxic options how can the City encourage citizens and prevent Calgarians from adopting an attitude “if you spray, I spray” or whatever form of pesticide control product citizens choose to employ?

ii Is the City prepared to stop spraying dandelions and other nuisance weeds that are not federally or provincially legislated?

11. The production of pesticides and fertilizers requires immense amounts of energy, thereby contributing to greenhouse gas emissions. Pesticides are incompatible with resilient, regenerative horticulture that is devised to increase soil carbon content. Thus, pesticide use comes with a direct carbon footprint, plus an indirect footprint as the result of killing important organisms including microbes.

What is the impact of the pest management policy on the City of Calgary’s carbon footprint, greenhouse gas emission targets and climate policy?

12. The City of Calgary has 5,200 parks. There are and have been for many years only 5 synthetic pesticide-free parks in the entire city comprising a minute proportion of the total number of parks and hectares. Northeast Calgary does not have a park designated as pesticide-free.

i Why has Parks been so slow to recognize the health benefits to its citizens of additional synthetic pesticide-free parks?

ii Why are the 7,600 plus tot lots used by Calgary’s most vulnerable segment of population (children) not been designated as synthetic pesticide-free parks?

iii Is there an element of environmental racism occurring in the Northeast depriving citizens of the health benefits of synthetic pesticide-free park otherwise enjoyed in the other three quadrants of the city?

It is our hope that you have time to peruse, contemplate and pose these questions to Administration. Although the procedures are not to be included in the policy which again is ambiguous with the inclusion of Procedures under Section 6 CPS2019-1518 Attachment #1 Council Policy we ask that Council direct the policy back to Administration for clarification, simplification and commitment to a pest management policy that values organic,

regenerative landscape management for the benefit of human and ecosystem health. We can't afford to wait another twenty-two years to affect policy of which we are proud.

Yours truly,

A handwritten signature in dark ink, appearing to read "Robin McLeod". The signature is fluid and cursive, with the first name "Robin" and last name "McLeod" clearly distinguishable.

Robin McLeod
Coalition for a Healthy Calgary