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RE: Proposed Pest Management Policy, to replace the Integrated Pest Management Policy (CPS2019-1518)

January 10, 2020

We thank the City of Calgary for its attention to the important issue of health, pesticides and landscaping. *Prevent Cancer Now* has a decade of engagement with Calgary about this topic.

We are writing to ask Council to remove the item from the Consent Agenda, and ultimately to vote against the proposed CPS2019-1518 - Pest Management Policy. The proposed policy is ambiguous and lacking specifics of the current Integrated Pest Management (IPM) Policy, and as such will not achieve the hoped-for improvements in pest management practices. We support the request by the Coalition for a Healthy Calgary to send the proposed Pest Management Policy back to staff.

Healthier options for pest management have been seriously derailed since the 1998 IPM policy was approved. Please ask staff to revise the proposed policy and procedures to address the considerations below, and questions noted by the Coalition for a Healthy Calgary.

Council is voting on a brief, simple policy reproduced here. We note that the extensive additional documentation provided by the City is not binding and is of interest but is of only indirect relevance. Our comments are below, in italics.

Comments on Proposed Pesticide Policy - CPS2019-1518 Attachment 1, Section 1:

POLICY STATEMENT

1.1 The City of Calgary:

(a) Prioritizes human health and ecosystem health objectives:

Human health and safety is prioritized in all aspects of pest management. Conservation and resilience of biodiversity and healthy, functioning ecosystems are essential to human health, effective pest management, municipal service delivery, and risk reduction.

["To prioritize" simply means to rank, but leaves open whether health will be ranked as the top, bottom, or a middling priority. No reference is made to choosing only safest options, nor to aspiring to improve biodiversity, soil health and carbon capture, nor to protecting health as the top priority.]

(b) Engages citizens and stakeholders:

Delivering and collaborating on accessible information is necessary to secure support and positive actions for pest management.

[When "delivering" precedes "collaborating" it is not clear that citizens will develop, and be supported in developing information and programs, rather than merely have opportunities to receive or share City information, or information from its industrial partners.]

(c) Is adaptable and accountable:

The pest management program is implemented effectively and adaptable over time. It is accountable to the citizens of Calgary and considers economic, social, environmental, organizational and financial

sustainability objectives. The program is aligned with best practices and research, and strives to meet or exceed all federal, provincial and municipal requirements.

[While all of these accountability metrics are important, some are impossible. The cost of treating a single cancer using modern therapies can dwarf the pest control budget – and yes, some pesticides used by the City do contribute to cancers. Health and environmental objectives must be preeminent. Juggling this long list of priorities will perpetuate the short-term, unhealthy, unsustainable pest control strategies too frequently used.

We wonder how the goats stack up in such an analysis, and how public enjoyment is accounted for - we applaud the goats initiative, which is highly successful in other jurisdictions as well.]

(d) Makes science-based decisions and actions:

Prediction, prevention, preparedness, response and recovery are the foundational components of pest management decision-making and action.

[Organic, sustainable practices will simplify this matrix, with greater prevention and resilience of biodiverse landscapes. This applies to all landscapes, including turf and planting of roadsides.]

With these ambiguities, lack of clear direction for best-practices supporting health, and unfocused metrics, this policy must be sent back to staff, with direction to state clearly that only least-toxic methods of pest control will be used, consistent with organic practices and regenerative agriculture. As well, the non-binding intention stated in section 6.1.2, "pesticides are only used for managing legislated pests, protecting City infrastructure and assets, and minimizing risk to human health and safety" must be elevated to the policy.

A tremendous number of serious inaccuracies litter the pages of the attachments, but the lack of knowledge and care by authors is perhaps best illustrated in the executive summary (p2, final paragraph). The federal regulator is called the "Pesticide Management Review Agency," while the PMRA is in fact the "Pest Management Regulatory Agency." Canadian scientists are clear that the statements that follow in the paragraph are also inaccurate, because there is **NO** established safe dose of pesticides. Many affect hormone and other biological signalling systems and are very potent at low doses. No combined effects are considered by assessors or regulators - of pesticides plus adjuvants added to increase potency, of exposures to multiple toxicants in real life, or cumulatively over time. Inadequacy of pesticide regulation to protect public health is further summarized here: www.preventcancer.ca/wp-content/uploads/2017/10/FedPesticideReg-vs-LeastToxicApproaches-PCN-Feb2017.pdf

Compare the proposed policy with the current 1998 IPM Policy

The current policy is on p33 of the document here:

www.calgary.ca/_layouts/cocis/DirectDownload.aspx?target=http%3a%2f%2fwww.calgary.ca%2fCSPS%2fParks%2fDocuments%2fPlanning-and-Operations%2fPest-Management%2fintegrated-pest-management-plan.pdf&noredirect=1&sf=1

The City of Calgary will manage vegetation and pests using IPM principles that:

- minimize the risk to human health and the environment
- use an ecological approach
- minimize the use of pesticides
- determine cost-effectiveness inclusive of life cycle maintenance of various park features and amenities
- consider community values in establishing standards of maintenance for public land

The City of Calgary will maintain a pesticide-free buffer zone in and around playground, tot lot areas, and public outdoor pools.

The City of Calgary will notify the public prior to herbicide applications in park areas.

[The 1998 IPM Policy is much clearer, and makes substantive commitments to protect child health. These are lacking in the proposed PM Policy.]

Overall, the natural biosphere is key to air and water quality, and to human and ecological health. Pesticides do not stay where sprayed and are variously linked to cancers, impaired early life development, and chronic diseases that are increasing in younger and younger Canadians. Focusing on ecologically sound landscaping addresses rights to clean air, clean water, clean soil and locally grown food that cannot be protected from pesticide drift.

At this nexus of climate change and risks associated with declines throughout the biosphere and in health of our young, this is one of many clear, brave, decisive steps that must be taken by Calgary City Council, to be resilient in the face of more extreme weather.

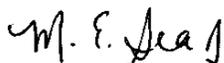
The bureaucracy and reporting outlined in other attachments to this agenda item are unrealistic without increased resources. Reporting under the current IPM Policy fell by the wayside years ago. The best use of City resources will be to focus on established methods used in other jurisdictions and by other practitioners, rather than the chemicals promoted by the multi-national vested interests represented among stakeholders. Missing among those providing input are experts who have successfully established lush, healthy turf in other jurisdictions by focusing on building the soil while capturing carbon. They recognize that chemicals that kill are counter-productive in the medium and long term.

Calgary has an unfortunate history of inappropriate use of toxic chemicals for pest control, despite the 1998 Integrated Pest Management Policy. It is time to take the straightforward approach that has been used successfully in other provinces for over a decade, that only least-toxic methods and products will be used for non-essential or “cosmetic” purposes.

In summary, we applaud Calgary for addressing an important issue for human and ecological health. This initiative has been seriously derailed, and we hope that the upcoming vote will help to put this issue back on track.

Please do not hesitate to ask if we may assist you further in this important matter of human and ecological health.

Sincerely,



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