

Play it **SAFE**

A CONSULTATION ON COSMETIC LAWN PESTICIDES: WHAT WE HEARD



In the spring of 2012, the province released a paper called “Play it SAFE” that outlined the background on the sale and use of cosmetic lawn and turf pesticides, explored options and raised awareness about the future use of cosmetic pesticides in Manitoba.

This document outlines what Manitobans said during the consultation.

WHAT WERE SOME OF THE OPTIONS IDENTIFIED IN “PLAY IT SAFE”?

The province suggested the following options that could be implemented alone or in combination. This included:

1. Further restrict the sale of pesticides used for cosmetic purposes

- limit sales to licensed pesticide applicators only
- prohibit all sales of cosmetic lawn pesticides

2. Further restrict the use of pesticides used for cosmetic purposes

- prohibit the application of home use cosmetic pesticides
- allow cosmetic pesticide use as part of integrated pest management
- require buffer zones around spray zones
- enhance signage requirements when pesticides are applied
- only allow licensed applicators to apply cosmetic pesticides
- focus regulations on lawns used by infants and young children
- develop restrictions for other turf used by infants and young children

3. Provide more information

- raise awareness about the concerns associated with cosmetic pesticides
- promote integrated pest management and environmentally-friendly alternatives to cosmetic pesticides

WHAT ADVICE WAS SOUGHT IN “PLAY IT SAFE”?

The province asked if Manitobans had concerns about pesticides used for cosmetic purposes, if they supported a different regulation of cosmetic pesticides and how the province should best regulate cosmetic pesticides in addition to any other comments or concerns.

WHAT WAS THE RESPONSE TO “PLAY IT SAFE”?

The province received more than 2,200 submissions online, by email or by letter.

Although “Play it SAFE” discussed a range of options for effective pesticide regulation, most of the responses were presented in terms of whether or not they supported a ban on the sale and/or use of cosmetic pesticides.

More than 800 submissions suggested the current regulations were sufficient. Some of these submissions were in response to an industry-led petition campaign that recommended against a ban on the cosmetic use of pesticides.



More than 1400 of the submissions supported further restrictions on the sale and/or use of cosmetic pesticides in Manitoba. Of these submissions, more than 1000 were in response to an online petition organized by a coalition of health and environmental groups that recommended a comprehensive cosmetic pesticide ban (see excerpt below).

“We are writing to voice our strong support for a ban on cosmetic pesticides in Manitoba. Such a move is necessary to protect the health of Manitobans and to prevent harm to the environment. (cont’d...)

Pesticides used on lawns and gardens pose needless dangers to people, pets and the environment. The risks to children are of particular concern. Medical studies have shown that exposure to many common pesticides poses serious adverse health risks. Organizations such as the Canadian Cancer Society and the Ontario College of Family Physicians have endorsed the call for a cosmetic pesticide ban.

Pesticides also cause harm to sensitive ecosystems. Contamination from pesticide residues puts our waterways at risk and some pesticides have also been found to harm honeybees and other pollinators that are essential for food production.

In light of the health and environmental concerns, a precautionary approach is appropriate and necessary. As you are aware, seven provinces have already taken steps to ban non-essential pesticides on lawns, gardens and in public parks. Municipalities across the country have taken similar action. Now is the time for the Government of Manitoba to take a leadership position to protect the health and environment of Manitobans.

We urge the Government to enact legislation that:

- prohibits the use, sale and import of synthetic chemical pesticides for lawns, gardens, landscaping and non-agricultural purposes, including any use of chemical pesticides by licensed applicators;
- provides for public education about the ban and about alternatives to chemical pesticides; and
- includes effective mechanisms of enforcement.

Thank you for your attention to this. We look forward to working with the Government to implement a science-based, precautionary approach to pesticide management and the protection of environmental health.”

WHAT CONCERNS WERE EXPRESSED WITH PESTICIDES USED FOR COSMETIC PURPOSES?

Many people expressed concerns about the potential impacts of pesticides on human health and the environment.

The risk to children, pregnant women, and other at-risk populations were highlighted as of particular concern.

“The Canadian Cancer Society is concerned about the health effects on Manitobans of using potentially cancer-causing substances to do nothing more than improve the appearance of green spaces by controlling unwanted weeds and plants.”



Some people felt pesticides were safe when used in accordance with manufacturer's instructions and regulatory requirements.

"These products are thoroughly assessed by Health Canada and are important tools for ensuring Manitoban's green spaces remain vibrant and healthy. I trust Health Canada to ensure that the pesticides it approves are safe and effective, and I want to be sure that I have access to these products to protect my property from insects, weeds and diseases."

WHAT REGULATORY OPTIONS WERE PROPOSED?

Some thought the current regulations were adequate.

"There are good systems and regulations already in place to ensure that there is no risk to the public from the proper use of these important products. Pesticides in Canada are regulated by Health Canada's Pest Management Regulatory Agency (PMRA). It is the PMRA's role to ensure that all pesticides used in Canada pose no unacceptable risk to people or the environment. The PMRA's regulations are considered among the best in the world." - Landscape Manitoba

Most of the people who supported further restriction of cosmetic pesticides called for an outright ban on the sale and use of these products.

"Guided by its mission and the precautionary principle, the Canadian Cancer Society, Manitoba Division takes the position that the sale and application of cosmetic pesticides in Manitoba should be prohibited." - Canadian Cancer Society, Manitoba Division

"The Environmental Health Association of Manitoba strongly supports the implementation of comprehensive legislation by the Province of Manitoba which would ban the sale and use of cosmetic pesticides, including their use in integrated pest management programs and on golf courses."
- Environmental Health Association of Manitoba

Others provided additional context for a new regulatory regime. Ecojustice, the Canadian Environmental Law Association, and the Canadian Association of Physicians for the Environment recommended: "the following key elements be incorporated into Manitoba's cosmetic pesticide law:

- The scope of the law should include all non-essential uses with exceptions only for the protection of public health.
- The law should include strong restrictions on sales.
- The only areas of farming exempt from the prohibition on cosmetic pesticide use should be those areas where the land is actually used for growing food or for livestock use.
- The law should apply equally in rural and urban areas.
- Golf courses should not be exempted but alternatively, a planning regime should be put in place to limit the environmental impact of pesticides by golf courses and encourage continued improvements of their practices.
- The Province should appropriately characterize this proposal as creating business opportunities.



- The phase-in period for the law be no more than 18- months and should include a public education strategy.”

Some people who did not support a total ban suggested alternative regulatory approaches such as:

- limiting the use of pesticides for use in lawn care to application by licensed applicators
- restricting the use of pesticides for lawn care on public property
- restricting the use of pesticides for lawn care based on the method application
- restricting the in-store display of pesticides for use in lawn care
- imposing an environmental levy on the sale of cosmetic pesticides
- requiring signage where pesticides have been used

“Rather than ban all cosmetic pesticides outright, I would hope that you would look to a more rational approach such as regulating the use of the pesticides by trained and or regulated individuals. Applicators who are properly trained and educated would eliminate much of the health and environmental risks, but at the same time they would allow the public to be rid of noxious weeds and invasive species which have invaded and or overtaken our lawns and fields (our environment).”

“If a provincial pesticide ban is inevitable, it’s my opinion that it should be limited to public spaces only.”

“My opinion is that the new ban should apply to products that are concentrates that require mixing. Pre mixed ready to use products should continue to be available. This would eliminate overdosing and ensure that these products are being used as directed.”

- “*
- 1. Legislate to put product behind glass in stores.*
 - 2. Impose environmental levy of at least 300% that will pay for administration and possible education around the topic.*
 - 3. Educate the public that there is no ban but that the product will increase in price to encourage a reduction in usage.”*

“I like Winnipeg’s pesticide by-law requirement for signage. Perhaps this could be improved on (e.g. signs go up 24 hours before AND are removed 24 after pesticide application; perhaps state the product used?, etc.).”



WHAT ELSE DID MANITOBANS SAY?

Some promoted integrated pest management.

"In addition the Province of Manitoba should work with Landscape Manitoba to promote alternatives to Pesticide uses such as Integrated Pest Management (IPM). This is a system of pest management provides a strategy that focuses on long-term prevention or suppression of pest problems through a combination of practices including: proper plant care; regular pest population monitoring; site or pest inspections; an evaluation of the need for pest control; consumer education and structural, mechanical, cultural, biological, and chemical controls. The selection of chemical control strategies should be utilized only when other strategies are inadequate."

Many people supported enhanced information and education, such as:

- information on natural pesticide alternatives (iron-based, corn gluten) and other green lawn practices (seeding, watering, soil amendments, aeration, grass-cycling, etc)
- information on the proper application of any pesticides

"I believe in educating Manitobans on safe use of pesticides."

"An appropriate education program for both consumers and lawncare applicators should be a start."

Some people suggested that informed homeowners would make appropriate choices.

"Allow consumer demand to shift the market with respect to chemical alternatives."

"Role of government should be to empower the public to make right choices with right tools."



WHO RESPONDED TO THE CONSULTATION?

In addition to hearing from hundreds of individual Manitobans, the province received feedback from the following groups and organizations:

Association of Manitoba Municipalities
Campaign for Pesticide Reduction
Canadian Association of Physicians for the Environment
Canadian Cancer Society
Canadian Consumer Specialty Products Association
Canadian Environmental Law Association
Canadian Federation of Independent Business
Chemical Sensitivities Manitoba
City of Winnipeg (Public Works Department)
Cosmetic Pesticide Ban Manitoba
CropLife Canada
Ecojustice
Environmental Health Association of Manitoba
Integrated Vegetation Management Association
International Peace Garden
Keystone Agricultural Producers
Lake Winnipeg Foundation
Landscape Manitoba
Manitoba Canola Growers
Manitoba Beef Producers
Manitoba Eco-Network Water Caucus
Manitoba Golf Superintendents Association
Manitoba Weed Supervisors Association
Neudorff North America
Organic Food Council of Manitoba
Premier Tech Home and Garden
Prevent Cancer NOW
Scotts Canada
Steinbach and Area Garden Club

