# Certified Organic Associations of BC (COABC)

# Presentation to the

# Special Committee on Cosmetic Pesticides

October 26, 2011

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# Mandate and Purpose

## Statements of Purpose

***Extracted from the 1993 COABC Constitution***

- **To promote organic agriculture and to provide education on organic agriculture and organic foods;**
- **To represent members in matters relating to the Agri-Food Choice and Quality Act of British Columbia;**
- **To develop and administer an organic certification accreditation program for members;**
- **To grant permission for the use of the phrase "British Columbia Certified Organic" and program symbol on agricultural product labels certified by members;**
- **To ensure there is a pool of qualified verification officers;**
- **To facilitate research and marketing activities on behalf of member organizations;**
- **To provide information to the public on behalf of the members;**
- **To develop and maintain an approved list of materials and standards for use in organic Agricultural products certified by members; and**
- **To be responsible for incidental matters related to the above-referenced activities.**

## COABC Mandate & Roles

***Extracted from the 1995 British Columbia Organic Industry Strategic Plan***

**The Certified Organic Associations of British Columbia (COABC) is an umbrella association representing organic certifying agencies in the province. COABC is empowered by the British Columbia Organic Agricultural Products Regulation under the British Columbia Food Choice and Disclosure Act to implement an organic certification accreditation province-wide. COABC was incorporated under the Society's Act in March of 1993.**

**The certification accreditation program is an industry and government partnership program which is industry - driven and industry - regulated, with government providing oversight authority. The main objectives of the program are to provide consumer confidence in the organic product certification, to assist producers to increase market share, and to support regional development of organic food production, processing and marketing.**

# Opening Statement

**(Presenter Intro: Randy Pearson, member of Islands Organic Producers' Association (IOPA) and IOPA's COABC alternate board representative. I reside and farm in Saanich. )**

**We are pleased to have this opportunity to make a presentation to the special legislative committee on the sale and use of cosmetic pesticides.**

**In starting, I will take a quote from our Vision Statement *"COABC's approach to food production is based on care for the earth. We recognize that as human beings, we are one creature among many that are all inter-related and interdependent."***

**Our Statement of Principles (sections 1.3 & 1.4 of the Production Standards, Appendix a) are based on healthy practices and protecting our natural environment.**

**The elimination of the unnecessary use of chemically derived pesticides in our province is a goal we strongly support. It is the term "unnecessary" that should be given the greatest consideration in this consultation process.**

**Synthetic and biological pesticides are prohibited under BC & Canadian Organic Standards, unless they are listed in the *Organic Production Systems Permitted Substances Lists* (appendix c).**

**Our production management practices override any necessity to use prohibited substances to manage weeds, pests and diseases.**

**COABC's presentation today will encourage the special committee to recommend a wide ban on synthetic pesticide sale and use.**

# The Case for a Pesticide Ban

**A 1991 BC survey of pesticide use concluded 5,039,977kg of pesticides were purchased or applied in that year. The report is 20 years old, however it is the only one available on the Ministry of Environment website. Although the study is dated, there isn't any reason to believe there has been a decrease in pesticide sale & use in BC.**

**A 2002 University of Victoria Environmental Law & Policy study (appendix d) compared the environmental records of Canada with Sweden. Pesticide use by Canada was reported at 29,206,000kg in 1994, and Sweden reported 1,527,000kg for 1997. Although Canada has more arable land, both countries generate 2% of their GDP through agriculture. (page 12)**

**A very interesting point to consider, the UVic research found Sweden had decreased pesticide use by more than 80% since 1980, by charging special taxes on pesticides and aggressively promoting organic agriculture.**

**It is widely recognized that toxic pesticide use and misuse causes human health problems and negatively impacts the environment.**

**I draw your attention to a list of research compiled by the *Organic Trade Association,* that focuses on *Protecting the Next Generation*. (appendix e) The Canadian & U.S. studies are hyperlinked. Many of the short research summaries refer to the organophosphate pesticides.**

**In 1999, Health Canada's Pest Management Regulatory Agency (PMRA) announced a re-evaluation of organophosphate pesticides.**

**Malathion (an organophosphate pesticide)**

**This pesticide is currently being used in BC, and is listed on the Ministry of Agriculture website as an emergency registration for application on stone fruit, berries & grapes. (appendix f)**

**On November 14, 2000, the PMRA issued a re-evaluation of Malathion. (appendix g)**

**An April 2003 PMRA factsheet provided information on the acceptability of Malathion for mosquito control. (appendix h)**

**The PRMA issued a November 05, 2010 communication advising of a Proposed Re-evaluation Decision on Malathion. (appendix i)**

**The Commissioner of the Environment & Sustainable Development delivered a Report (appendix j) to the House of Commons in 2003. At paragraph 1.58 (exhibit 1.8) of the Report, the re-evaluations of selected organophosphate pesticides (malathion included) had been delayed and the Commissioner's audit was critical of the delays, and stated in part *"…Canadians may be unnecessarily exposed to these pesticides…"***

**The final PMRA decision on the sale and use of Malathion has yet to be issued. It's been12 years since the 1999 PMRA decision to re-evaluate organophosphate pesticides in Canada, and 8 years since the Commissioner's Report.**

**A re-evaluation decision on diazinon, another organophosphate pesticide was issued on November 04, 2009. Diazinon use on apples is included in the phase out, however malathion was listed as one of the alternative pesticides. The final decision allowed a long term phase out for use on apples. The number of years to "long term" doesn't appear to be defined by the PMRA.**

**Malathion is an organophosphate pesticide that contains a petroleum distillate. It is a highly toxic substance that can destroy aquatic organisms. Malathion was first registered in 1953. Malathion was selected for tracking as it is currently being used in BC, and it was recognized as a pesticide that required federal agency re-evaluation. This example is one pesticide of many being sold & used in BC.**

**The Commissioner's 2003 Audit Report**

**Para 1.1 *"Despite substantial improvements in some areas over the last eight years, the federal government is not adequately ensuring that many pesticides used in Canada meet current standards for protecting health and the quality of the environment. The range of weaknesses we identified raises serious questions about the overall management of the health and environmental risks associated with pesticides."***

**Para 1.5 (in part) *"Health Canada has done only limited research on the health effects of pesticides despite the federal government's stated priority in this area."***

**We strongly recommend the members of this special committee review the contents of this critical report. The Report's conclusions are worrisome, and it gives us no comfort that Health Canada is protecting us and the environment from toxic pesticides.**

**The Broad Brush of Synthetic Pesticide Applications**

**Surface and ground water collects the residues of the pesticides. Aquatic life is negatively impacted. Domestic and wild animals absorb and ingest the toxins. Birds feed on pesticide laden seeds and insects. Nature's living creatures drink the polluted water. Beneficial insects**

**are destroyed along with the targeted pests. Pollinators that are so critical to natural plant life and agricultural crops, perish from many of the toxic pesticides.**

**Many studies link the sale, use & misuse of toxic pesticides to human health problems.**

**The apparent safe use of synthetic pesticides is directly related to the strict adherence to the application instructions. Health Canada doesn't know if those application instructions are being followed.**

**<u>Rural & Urban Farming and Local Food Security</u>**

**Most organic farms are situated in rural areas, however many of our small scale producers are located in semi-rural areas and close to residential areas. We see a growing trend toward urban backyard farming and community gardens, producing food for personal use and commercial market garden sales.**

**Synthetic pesticide use in nearby properties can physically move beyond the intended area, and contaminate the food production land of those small scale producers and home gardeners.**

**Organic Crop Production Standards require an 8m buffer zone or permanent hedgerow to prevent contamination by prohibited substances, if the danger exists, thereby making it impractical for a small scale producer or backyard gardener to protect their food crops from unwanted pesticides.**

**If contamination by prohibited substances occurs on organic land, there is a 36 month ban on organic crop production in the affected area.**

**<u>Apiculture</u>**

**Organic Standards require the location of bee hives at least 3000m from sources or zones of synthetic pesticides and from flowering crops treated with prohibited pesticides.**

**<u>Contamination of Surface & Ground Water</u>**

**Organic producers are very concerned about water quality, and are required to monitor irrigation and washing water for prohibited substances, including pesticides.**

# Conclusions

**The BC Organic Sector is convinced the current sale and use of synthetic pesticides in BC, and in Canada, is detrimental to human health and the ecosystems of our province and country. We cannot continue the unsustainable practices of applying pesticides to artificially manage & control the environment around us.**

**Mono-cropping, the cycle of chemical fertilizer applications, and the cycle of pesticide applications, all contribute to destroying the living soil and unbalancing the lives of insects, birds and amphibians. Plants existing in poor soil and poor environmental conditions become stressed and become targets for disease and pests. More pesticides are then added.**

**The desire for "beautiful" landscaped properties to please ourselves or tourists, the "economic need" to produce apples without insect scars, or to golf on weed-less turf, seems only achievable if we apply synthetic pesticides. The argument is that it is an <u>economic necessity</u>.**

**The federal government has the responsibility to protect human health and the environment against the use and misuse of pesticides. However, the record shows we cannot leave it up to federal government politicians to make managing that process a priority. The "acceptable risk" policy in registration and re-evaluations of pesticides is biased in the interest of short-sighted economic considerations, that are unsustainable in the long term. Agriculture and Agri-Food Canada's Pest Management Centre is responsible for identifying sustainable pest control strategies. The public consultation process in carrying out their mandate is crowded with biopesticide industry representatives. Organic sector representatives are needed.**

**The Swedish strategy to increase the financial costs of synthetic pesticide sale & use, along with aggressively promoting organic agriculture appears to be worth investigating.**

**We strongly believe the solution to eliminating the use of dangerous pesticides in BC, is greater use of organic management practices.**

**The government of BC needs to apply the "precautionary principle" in banning synthetic pesticide sale and use. The federal government's "acceptable risk" policy is bad for us, and bad for the environment.**

**The terms of reference and specifically "the elimination of the unnecessary use of pesticides in BC" should be closely examined in that respect. Can organic management practices make the use of toxic pesticides "unnecessary"? We say it does, and we should move public policy in that direction.**

# Recommendations

**1. COABC requests the special committee recommend a ban on the sale and the use of synthetic pesticides <u>not listed</u> in the Organic Production Systems Permitted Substances Lists, in the residential, commercial (including golf courses), institutional and government sectors in BC. The ban should have a short term phase in period.**

**2. COABC requests the special committee recommend a high profile public education program on the negative impacts of synthetic pesticide use and on the alternative methods of managing unwanted "weeds", pests and diseases. The educational program for alternative methods should incorporate BC organic standards, organic management practices and integrated pest management systems.**

**3. COABC requests the special committee recommend an extended transition period and ban on synthetic pesticide sales and use in the agricultural sector. The transition period to include an organic management education program, incentives and industry targets for decreasing the application levels of synthetic pesticides during the transition period. The transition program should include financial disincentives for synthetic pesticide sales and use.**

**4. COABC further requests the special committee recommend organic sector representatives be invited to participate in all consultation processes related to banning the sale and use of synthetic pesticides and for identifying and recommending alternative strategies to manage pests.**

**Respectfully Submitted**

**COABC Executive**

# Appendices

(a) BC Certified Organic Production Operation Policies & Management Standards Book 2 (Dec 2009) http://www.certifiedorganic.bc.ca/standards/docs/Book_2_V9.pdf

(b) Organic Production systems General Principle and Management Standards CAN/CGSB-32.310-2006 http://www.certifiedorganic.bc.ca/standards/docs/032-0310-2008-eng.pdf

(c) Organic Production Systems Permitted Substances Lists CAN/CGSB-32.311.2006 http://www.certifiedorganic.bc.ca/standards/docs/032-0311-2008-eng.pdf

(d) University of Victoria Environmental Law & Policy Study February 2002 http://www.environmentalindicators.com/htdocs/PDF/Report.pdf

(e) Organic Trade Association, Protecting the Next Generation. http://www.ota.com/organic/benefits/children.html

(f) Malathion http://www.agf.gov.bc.ca/pesticides/malathion_emergency_%20label.pdf

(g) PMRA notice of re-evaluation for malathion http://www.hc-sc.gc.ca/cps-spc/pubs/pest/_decisions/rev2000-06/index-eng.php

(h) PMRA Factsheet: malathion use for mosquito control http://www.hc-sc.gc.ca/cps-spc/alt_formats/pdf/pubs/pest/_fact-fiche/malathion-eng.pdf

(i) PMRA notice of proposed re-evaluation decision for malathion. http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/_prvd2010-18/prvd2010-18-eng.php

(j) The Commissioner of the Environment & Sustainable Development Audit Report (2003) on PMRA http://www.oag-bvg.gc.ca/internet/docs/c20031001ce.pdf