



## **Submission to the Special Committee on Cosmetic Use of Pesticides in British Columbia Consultations**

Victoria, BC

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The BC Agriculture Council (BCAC) is the province's umbrella farm organization. We are a council of commodity groups and, through our members, represent 14,000 of the 20,000 B.C. farm families who, in turn, generate 96 percent of the farm gate receipts in British Columbia. Agriculture is the third largest resource sector in the province.

The BC Agriculture Council actively:

- Assists in developing an economic environment that provides for strengthened competitiveness, long term growth, employment, and economic viability in the B.C. agriculture and agri-food industry;
- Fosters cooperation and a collective response to matters affecting the future of agriculture in the province; and
- Provides to members services that assist in achieving the purposes of the Council.

In representing farmers and ranchers from across B.C., it is not directly within the purview of the BCAC to comment on the use of "cosmetic" uses of pesticides in urban landscapes and residential areas. We will, therefore, leave specific input regarding such provisions to organizations and individuals more directly involved in pest control in those environments. It is of critical importance to the BCAC, however, that any legislative, regulatory or policy changes made with respect to urban and residential cosmetic pesticide use take into full consideration the impacts that such changes could have on the agriculture industry. It is within this context that the BCAC is providing the following input.

### **Invasive Plants and Other Pests:**

A significant concern to the agriculture industry is invasive plants. Invasive alien plant species can pose significant detrimental hazards to humans, animals, natural ecosystems, and agricultural production. Often mistaken for wildflowers, invasive plants are spreading through our natural ecosystems, urban landscapes, and agricultural lands at an alarming rate, and can have widespread negative economic, social, and environmental impacts.

In response, the *Invasive Plant Strategy for British Columbia* was developed in 2003 by a wide range of interest groups including various levels of government, a number of industry groups including agriculture, First Nations, non-government organizations, user groups, and utilities. The goal of the strategy is to build cooperation and coordination to protect B.C.'s environment and minimize negative social and economic impacts caused by the introduction, establishment, and spread of invasive alien plants.

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In a report released in February 2009, “Managing Risks to Canada’s Plant Resources” ([http://www.oag-bvg.gc.ca/internet/docs/parl\\_oag\\_200812\\_04\\_e.pdf](http://www.oag-bvg.gc.ca/internet/docs/parl_oag_200812_04_e.pdf)), Canada’s Auditor General Sheila Fraser called for greater protection of Canada’s crops and forests given that the associated industries are worth \$100 billion a year. The report pointed to the threats associated with invasive plants, seeds, pests, and diseases. Curtailing their spread is not just a Federal Government responsibility, but also a responsibility of the Province, local governments, industry, and individual citizens, as identified in the *Invasive Plant Strategy*.

Any proposal to limit, ban, or curtail the use of pesticides for urban cosmetic purposes must fully consider the potential limitations it imposes on the ability to control weeds, pests, plant diseases, and related problems in sectors such as agriculture and forestry. If there is an infestation or related problem in a residential property that is next to farm land, it can easily spread to those adjacent fields, orchards, or pastures with potentially devastating economic and environmental impacts for the farm and livestock and/or require pest control applications far in excess of what would have been required initially.

#### **Area-Wide Community Strategies:**

Integrated Pest Management initiatives are often best implemented through an area-wide community strategy. The Okanagan Sterile Insect Release (SIR) Program is an example of a highly successful area-wide community initiative that applies nature-friendly technology to the control of codling moth, the BC tree fruit industry’s most damaging and costly pest. The SIR Program is substantially reducing pesticide applications to control codling moth, which will mean a more competitive fruit industry over the long term.

Ultimately, the goal is to control codling moth infestations to the point where chemical interventions would be eliminated in commercial orchards and their surrounding areas.

As part of the program, however, pest control products must be made available and properly applied not only by commercial orchardists, but also by nearby non-commercial (ornamental and backyard) host tree owners in order to reduce threats to commercial orchards. If the codling moth is allowed to proliferate on residential properties, there will be no return to the huge investments made into the SIR program and, ironically, pesticide usage would resurge.

#### **BC’s Unique Urban-Rural Landscape:**

The above challenges in applying effective pest management strategies are more pronounced in British Columbia than in other provinces. As a result of the Agricultural Land Reserve (ALR) having been in place in British Columbia since the mid-1970s, many areas of the province have mixed agricultural-urban landscapes. The ALR policy serves a compelling public interest by preserving productive lands for future agriculture and food production. It is only of value to the agriculture industry and B.C. communities, however, if farmers and ranchers are able to make a living on this land. Lack of effective weed, pest and disease control on lands adjacent to agricultural lands will, in many situations, risk future farmer and rancher livelihoods.

**The Pesticide Regulatory Framework:**

Finally, the federal *Pest Control Products Act* is among the most modern and rigorous pesticide Acts in the world. The Canadian pesticide regulatory process underwent an exhaustive review in the 1990s with new legislation coming into force in 2006. Together with the provincial *Integrated Pest Management Act* and *Regulations* and, for agricultural usage, the *Occupational Health and Safety Regulation* administered by WorkSafeBC, the new legislation provides a rigorous regulatory framework for pest control product usage in the agriculture sector.

The BCAC encourages the Committee to apply this same science-based approach to any further provisions that may be considered with respect to the cosmetic pesticide issue and to fully consider the potentially serious implications for food-producing sectors.

Respectfully submitted,  
The British Columbia Agriculture Council



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