

November 13, 2009

Liz Quarshie, Deputy Minister
Saskatchewan Ministry of Environment
3211 Albert Street, 5th Floor
Regina, SK S4S 5W6

Dear Deputy Minister Quarshie:

CropLife Canada has recently reviewed a document released by your department called *A Guide to Reducing the Cosmetic Use of Herbicides in Saskatchewan* (September 2009 edition).

As the trade association that represents the manufacturers, distributors and developers of plant science technologies, including pest control products, we applaud the Ministry for its efforts to “*increase the awareness of the public and encourage the use of alternative methods for weed control while allowing the responsible use of herbicides*” in urban settings. Many municipalities and some provinces have made ideological rather than science-based decisions in this area.

While the intent of the aforementioned guide is good, there are a number of elements that are inaccurate, inappropriate or contradictory and we are writing to request that these problems be corrected as quickly as possible in order to ensure the Saskatchewan public has the best possible information available upon which to act.

We would be pleased to provide detailed comments, however the following list is designed to provide you with a general idea of the types of concerns we have identified:

- The document endorses Health Canada as the lead authority on pesticides but then includes references and conclusions from individuals and organizations (such as Dr. Basrur and Toronto Public Health) that take positions which are clearly contrary to Health Canada's.
- The document repeatedly refers to *cosmetic* pesticides; however such a category of pesticides does not officially exist. Rather, the term is one coined by anti-pesticides activists to devalue the products. None of our companies develops, distributes or manufactures products under a cosmetic category and Health Canada does not approve pesticides for cosmetic uses.
- The explanation of IPM is poor and the concept is mentioned as an afterthought, which is unfortunate because IPM is a very effective way of reducing pesticide use.

- Illegal, unregistered pesticides such as rubbing alcohol and bleach are recommended as alternatives – a direct contravention of the federal *Pest Control Products Act*.
- Some of the alternative control methods identified are questionable (e.g. rototilling, goats, boiling water).
- The use of terms such as safer, inexpensive/expensive, or highly effective when referring to certain products is subjective and could be problematic.
- The section on weeds (2.6) has selectively omitted all chemical control options in the description for control.

Our industry believes that pesticides must be used responsibly in all use areas whether it be agriculture or urban spaces. We remain committed to working with governments and others to ensure accurate, useful information is conveyed to the users of our products and the public. We feel strongly, however, that the above-noted issues are significant enough to warrant removing the document from circulation until corrections can be made and a more accurate and effective public information piece can be put in place.

We would be happy to work with the authors to make this document a more valuable tool for informing Saskatchewanians.

Sincerely,

Lorne Hepworth
President

cc: Alanna Koch, Deputy Minister
Saskatchewan Ministry of Agriculture