

June 28, 2006

The Hon. Tony Clement
Minister of Health
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Clement:

**RE: Request for Special Reviews of Pesticides Prohibited in Other Nations,
Pursuant to Section 17 of the New *Pest Control Products Act***

Congratulations on the long-awaited coming into force of the new and improved *Pest Control Products Act (PCPA)* passed in 2002.¹ It is widely acknowledged that the previous Canadian legislation governing pesticides was badly out of date and incapable of adequately protecting human health and the environment.² The new legislation, if satisfactorily implemented and enforced, has the potential to address many of the concerns raised about the old law.

The new *PCPA* offers an important opportunity to enter a new era in Canadian pesticide regulation, enabling the federal government to regain the trust and confidence of Canadians. The primary purpose of the new Act is clear—to provide a stronger level of protection for the health of Canadians and the environment from the harmful effects of pesticides. As section 4 of the new *PCPA* states:

In the administration of this Act, the Minister's primary objective is to prevent unacceptable risks to people and the environment from the use of pest control products.

In addition, section 4.1 of the new *PCPA* provides that:

For greater certainty, protection and consideration afforded to children in this Act shall also extend to future generations.

One of the goals of the new Act is to make Canada a world leader in pesticide regulation. Section 17 of the new *PCPA* imposes a statutory obligation upon the Minister of Health to initiate a special review of registered pest control products containing active ingredients banned by a member nation of the Organization for Economic Cooperation and Development (OECD) because of health or environmental concerns.³ The purpose of this section of the new *PCPA*, consistent with the overall purpose of the new law, is to ensure that Canadians are provided with the strongest protection against the harmful effects of pesticides rather than being treated as second-class citizens.

Once a special review is initiated, section 19 places the burden of proof where it belongs, requiring registrants to provide evidence that their products do not cause unacceptable health and environmental effects. As well, the new *PCPA* requires the application of the precautionary principle in the Minister of Health's special review decisions, meaning that where there is some evidence of harm to human health or the environment, the lack of scientific certainty should not be used to postpone actions to avoid environmental contamination. The application of the precautionary principle is of substantial importance in special reviews in light of extensive but not conclusive evidence linking pesticides with cancer, developmental problems, reproductive disorders, and other health problems.

An extensive review of pesticide registrations in Canada and the other nations belonging to the OECD has been conducted for the David Suzuki Foundation by environmental lawyer and author David R. Boyd.⁴ Databases maintained by Canada's Pest Management Regulatory Agency, the US Environmental Protection Agency, and the OECD were used to conduct a cross-national analysis.⁵

This comparative analysis reveals that there are 60 active ingredients used in pesticides that continue to be registered for use in Canada despite having been prohibited in other OECD nations because of health and environmental concerns. *Appendix 1* provides a list of 60 active ingredients registered in Canada for use in pest control products but prohibited in other OECD nations.

For each of the 60 active ingredients in *Appendix 1* we have provided the common name, the Chemical Abstracts Service registry number (CAS#), a list of OECD nations where the pesticide is prohibited, and a brief summary of the adverse effects on human health. The health concerns associated with the pesticides that are still registered for use in Canada include increased risk of cancer, acute toxicity (creating the risk of pesticide poisoning), developmental disorders, reproductive problems, organ damage, and interference with the human hormone system. The summary of health effects provided in *Appendix 1* comes from information published by the US Agency for Toxic Substances and Disease Registry, the US Environmental Protection Agency, and the European Union. Although not detailed in *Appendix 1*, all of the pesticides prohibited by other OECD nations also have adverse environmental effects, including harm to birds, fish, and other forms of wildlife.

Unfortunately, there is no national data available on pesticide use in Canada, making it impossible to evaluate the magnitude of use of these 60 pesticides. However some insight can be gleaned through a recent provincial survey of pesticide use in Ontario.⁶ Many of the pesticides banned in other nations were reported as being used in significant volumes in Ontario. In fact, two of the five most heavily used pesticides in Ontario in 2003, atrazine and 1,3-dichloropropene, are banned in other OECD nations. Atrazine was banned years ago in Sweden, Germany, Norway, and Denmark and is now prohibited throughout the European Union. The active ingredient 1,3-dichloropropene is prohibited in Austria and Germany, while its registration was canceled in Australia.

The David Suzuki Foundation's guiding principle in policy matters related to environmental health is that Canadians should enjoy a level of protection from environmental threats that is equal to or better than the highest standard enjoyed by the citizens of other industrialized nations. The continued registration of pesticides prohibited in other OECD nations because of health and environmental concerns clearly violates this principle.

We therefore request that you initiate special reviews of pest control products registered for use in Canada containing the 60 active ingredients described in *Appendix 1*, attached to this letter.

Respectfully,

A handwritten signature in black ink, appearing to read "Ann Rowan", with a long horizontal flourish extending to the right.

Ann Rowan
Director, Sustainability Project

Appendix 1:

Pesticide active ingredients registered in Canada but prohibited in other OECD nations

1. 1,3-dichloropropene

CAS# 542-75-6

Banned by: Austria, Germany, Sweden, registration canceled in Australia.

Health effects: According to the US Environmental Protection Agency, 1,3-dichloropropene is a probable human carcinogen and is highly toxic. The International Agency for Cancer Research classifies it as a possible human carcinogen. Exposure to 1,3-dichloropropene causes irritated skin and eyes, as well as damage to the lungs, stomach, liver, and kidneys.⁷

2. 2,4-D

CAS# 94-75-7

Banned by: Denmark, Norway, Sweden.

Health effects: 2,4-D is a possible human carcinogen and a suspected endocrine disruptor, causing adverse developmental and reproductive effects.

3. Amitraz

CAS# 33089-61-1

Banned by: Norway, European Union.

Health effects: The US EPA has classified amitraz as a possible human carcinogen. Amitraz is neurotoxic, affects the central nervous system and impairs development and reproduction.⁸

4. Amitrole

CAS# 61-82-5

Banned by: Finland, Norway, Sweden

Health effects: Action was taken in these three Nordic nations because of risk of carcinogenic effect on humans. The US EPA describes amitrole as a relatively potent carcinogen. Amitrole is also a suspected endocrine disruptor.⁹

5. Atrazine

CAS# 1912-24-9

Banned by: Denmark, Germany, Norway, Sweden, European Union.

Health effects: Atrazine is an endocrine disruptor, meaning it alters the normal functioning of the endocrine system, resulting in impaired reproduction and hormone levels. negative effects on the reproductive system, including low birth weight; negative effects on development, possible organ damage, evidence of carcinogenicity in other animals but data on cancer risk to humans are inconclusive.¹⁰

6. Bromacil

CAS# 314-40-9

Banned by: Germany, Slovenia, Sweden.

Health effects: Bromacil is classified as a possible human carcinogen by the US EPA. Other health effects include negative effects on development, the thymus, the thyroid, and eye irritation.¹¹

7. Bromoxynil

CAS# 1689-99-2, 1689-84-5

Banned by: Norway, Sweden.

Health effects: The US EPA considers bromoxynil to be a possible human carcinogen and developmentally toxic. Fetuses, infants, and children are particularly vulnerable.¹²

8. Captan

CAS# 133-06-2

Banned by: Denmark, Finland, Norway.

Health effects: Captan is a severe eye irritant and is classified by the US EPA as a probable human carcinogen.¹³

9. Carbaryl

CAS# 63-25-2

Banned by: Austria, Germany, Sweden.

Health effects: Carbaryl is classified by the US EPA as a likely human carcinogen and affects the nervous system causing nausea, dizziness, confusion, and at high exposures, respiratory paralysis, and death. Carbaryl is also a suspected endocrine disruptor.¹⁴

10. Carbofuran

CAS# 1563-66-2

Banned by: Sweden.

Health effects: Exposure to carbofuran can over-stimulate the nervous system causing nausea, dizziness, confusion, and at very high exposures (e.g., accidents or major spills), respiratory paralysis and death. Carbofuran is a suspected endocrine disruptor.

11. Chloropicrin

CAS# 76-06-2

Banned by: Austria, Germany, Sweden.

Health effects: Chloropicrin is highly toxic and can cause abdominal pain, cough, diarrhoea, dizziness, headache, nausea, and sore throat.

12. Chlorothalonil

CAS# 1897-45-6

Banned by: Sweden.

Health effects: The US EPA classifies chlorothalonil as a likely human carcinogen, while the International Agency for Research on Cancer rates it as a possible human carcinogen. Chlorothalonil is also a severe eye irritant.

13. Chlorpyrifos

CAS # 2921-88-2

Banned by: Finland, Sweden.

Health effects: Chlorpyrifos can cause nausea, headaches, vomiting, blurred vision, difficulty breathing, memory impairment, and damage to the central nervous system. High exposures can result in respiratory paralysis and death. Chlorpyrifos is suspected of being genotoxic. Children, the elderly, and people with respiratory problems are particularly vulnerable.¹⁵

14. Dazomet

CAS# 533-74-4

Banned by: Denmark

Health effects: Denmark banned dazomet because of concerns about developmental and reproductive problems.

15. Deltamethrin

CAS# 52918-63-5

Banned by: Denmark.

Health effects: Deltamethrin is suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

16. Diazinon

CAS# 333-41-5

Banned by: Denmark.

Health effects: Symptoms include nausea and vomiting, abdominal cramps, slow pulse, diarrhea, pinpoint pupils, difficulty in breathing, damage to the pancreas, and passing out (coma). Central nervous system toxicity includes respiratory depression, anxiety, insomnia, headache, apathy, drowsiness, dizziness, loss of concentration, confusion, tremors, convulsions, and coma. At very high exposures (e.g. accidents or major spills) respiratory paralysis and death. Diazinon is suspected of being an endocrine disruptor with adverse developmental and reproductive effects.¹⁶

17. Dichlobenil

CAS# 1194-5-6

Banned by: Denmark, Norway, Sweden.

Health effects: Dichlobenil generally is of low acute toxicity, but causes systemic, developmental and reproductive toxicity effects in animal studies and has been classified as a possible human carcinogen.¹⁷

18. Dichlorprop

CAS# 120-36-5, 7547-66-2

Banned by: Denmark.

Health effects: Dichlorprop is a possible human carcinogen and has adverse effects on developmental processes.

19. Dichlorvos/DDVP

CAS# 62-73-7

Banned by: Denmark, Sweden, United Kingdom.

Health effects: The US EPA concluded that dichlorvos is a probable human carcinogen while the International Agency for Research on Cancer ranks dichlorvos as a possible human carcinogen. Dichlorvos affects the central nervous system and

can cause symptoms ranging from nausea and loss of bladder control to respiratory failure and coma.¹⁸

20. Dicofol

CAS# 115-32-2

Banned by: Finland, Netherlands, Norway, Sweden.

Health effects: The US EPA classifies dicofol as a possible human carcinogen. An organochlorine pesticide, dicofol is persistent, bioaccumulative, and a suspected endocrine disruptor with adverse developmental and reproductive effects.¹⁹

21. Dinitrophenol

CAS# 51-28-5

Banned by: Sweden.

Health effects: Dinitrophenol is acutely toxic and causes skin irritation, nausea, headaches, numbness, cataracts, and decreased white blood cell counts. People with certain genetic characteristics are much more susceptible than the majority of the population.²⁰

22. Dinocap

CAS# 39300-45-3

Banned by: Sweden. In the US, the manufacturer of Dinocap voluntarily withdrew all product registrations for the US market, so there are no registered Dinocap products used in the US.

Health effects: Dinocap is a developmental toxin.²¹

23. Diquat

CAS# 85-00-7

Banned by: Denmark.

Health effects: Diquat is a neurotoxin and causes abdominal pain, diarrhoea, disorientation, nausea, and vomiting.

24. Diuron

CAS# 330-54-1

Banned by: Sweden.

Health effects: The US EPA classifies diuron as a known/likely human carcinogen. Diuron is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.²²

25. Endosulfan

CAS# 115-29-7

Banned by: Netherlands, Norway, Sweden, European Union.

Health effects: Endosulfan is acutely toxic whether inhaled or consumed orally. It has adverse effects on the central nervous system and harmful effects on the stomach, blood, liver, and kidney. Endosulfan is highly persistent, causes neurotoxic effects, and acts as an endocrine disruptor, affecting developmental and reproductive processes.²³

26. Ethylene oxide

CAS# 75-21-8

Banned by: Austria, Czech Republic, Finland, Germany, Sweden, United Kingdom, European Union.

Health effects: The International Agency for Research on Cancer classifies ethylene oxide as carcinogenic to humans. Ethylene oxide also causes negative effects on reproduction, irritation of the eyes, skin, and mucous membranes and problems in the functioning of the brain, central nervous system, and reproductive system.²⁴

27. Fenthion

CAS# 55-38-9

Banned by: European Union

Health effects: Exposure to fenthion can cause dizziness, vomiting, headaches, incontinence, respiratory problems, muscle spasms, and seizures.

28. Ferbam

CAS# 14484-64-1

Banned by: European Union.

Health effects: Ferbam is toxic to the liver, kidneys, and lungs.²⁵

29. Hexazinone

CAS# 51035-04-2

Banned by: Denmark, Norway, Slovenia, Sweden.

Health effects: Hexazinone is a severe eye irritant and has adverse effects on developmental and reproductive systems.²⁶

30. Iprodione

CAS# 36734-19-7

Banned by: Denmark.

Health effects: The US EPA classifies iprodione as a likely human carcinogen. Iprodione is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.²⁷

31. Linuron

CAS# 330-55-2

Banned by: Norway, Sweden.

Health effects: The US EPA classifies linuron as a possible human carcinogen. Linuron is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.²⁸

32. Maleic hydrazide

CAS# 123-33-1, 10071-13-3

Banned by: Austria, Denmark, Finland, Germany, United Kingdom

Health effects: According to the US EPA, maleic hydrazide appears to be genotoxic (has the potential to affect DNA repair processes) at high doses in some mutagenicity tests.²⁹

33. Mancozeb

CAS# 8018-01-7

Banned by: Norway.

Health effects: The US EPA indicates that mancozeb harms the thyroid, impairs neurological development, and is a probable human carcinogen. Ethylene thiourea (ETU) is a metabolite of mancozeb, maneb, and metiram. ETU causes developmental defects, with effects seen in the central nervous system, urogenital and skeletal systems. The US EPA classifies ETU as a probable human carcinogen and a possible endocrine disruptor.³⁰

34. Maneb

CAS# 12427-38-2

Banned by: Sweden.

Health effects: The US EPA indicates that maneb harms the thyroid and impairs neurological development. Ethylene thiourea (ETU) is a metabolite of mancozeb, maneb, and metiram. ETU causes developmental defects, with effects seen in the central nervous system, urogenital and skeletal systems. The US EPA classifies ETU as a probable human carcinogen and a possible endocrine disruptor.³¹

35. Metalaxyl

CAS# 57837-19-1

Banned by: European Union

Health effects: Metalaxyl can cause nausea, vomiting, respiratory difficulties, severe eye irritation and liver damage.

Number of registered pesticide products in Canada containing metalaxyl: 7

36. Metiram

CAS# 9006-42-2

Banned by: Denmark, Finland, United Kingdom.

Health effects: The US EPA indicates that metiram harms the thyroid and impairs neurological development. Ethylene thiourea (ETU) is a metabolite of mancozeb, maneb, and metiram. ETU causes developmental defects, with effects seen in the central nervous system, urogenital and skeletal systems. The US EPA classifies ETU as a probable human carcinogen and a possible endocrine disruptor.³²

37. Monolinuron

CAS# 1746-81-2

Banned by: European Union.

Health effects: Exposure to monolinuron can harm the blood system and may cause anemia. Monolinuron also contains 4-chloroaniline, a highly toxic substance that is suspected of being carcinogenic and genotoxic.

38. PCNB, also known as Quintozene

CAS# 82-68-8

Banned by: Austria, Finland, Germany, European Union.

Health effects: The US EPA classifies PCNB as a possible human carcinogen. PCNB is suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

39. Paclobutrazol

CAS# 76738-62-0

Banned by: Sweden.

Health effects: Paclobutrazol can cause eye irritation, headaches, respiratory problems, liver damage, and harm to reproduction and development. Inadequate data exists to determine whether exposure to paclobutrazol causes an increased risk of cancer.

40. Pentachlorophenol (PCP)

CAS# 87-86-5

Banned by: Germany, Netherlands, New Zealand, Sweden, Switzerland.

Health effects: PCP can cause harmful effects on the liver, kidneys, blood, lungs, nervous system, immune system, and gastrointestinal tract. Low-level long-term exposure can also result in damage to the immune system and the endocrine system, leading to developmental and reproductive problems. The International Agency for Research on Cancer has determined that pentachlorophenol is possibly carcinogenic to humans, and the US EPA has classified pentachlorophenol as a probable human carcinogen.³³

41. Para-dichlorobenzene, aka 1,4-dichlorobenzene

CAS# 106-46-7

Banned by: Sweden.

Health effects: Both the US EPA and the International Agency for Research on Cancer classify para-dichlorobenzene as a possible human carcinogen.

42. Paraquat

CAS# 1910-42-5, 4685-14-7

Banned by: Austria, Denmark, Finland, Slovenia, Sweden.

Health effects: Paraquat exhibits high acute toxicity and can cause lung damage, nausea, abdominal pain, vomiting, and impair normal development.

43. Permethrin

CAS# 52645-53-1, 54774-45-7, 51877-74-8

Banned by: European Union.

Health effects: The US EPA classifies permethrin as a possible human carcinogen. Permethrin is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

44. Picloram

CAS# 1918-02-1

Banned by: Sweden.

Health effects: Picloram contains hexachlorobenzene, an impurity that is a probable human carcinogen. As well, picloram is extremely persistent and structurally similar to DEHP, a plasticizer that causes cancer in rodents. Picloram is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.³⁴

45. Propanil

CAS# 709-98-8

Banned by: Sweden

Health effects: Propanil causes methemoglobinemia. Propanil is suspected of being an endocrine disruptor, and harms the body's immune system. The US EPA classifies propanil as a likely human carcinogen.³⁵

46. Propoxur

CAS# 114-26-1

Banned by: Sweden.

Health effects: The US EPA classifies propoxur as a probable human carcinogen. It is highly toxic and has adverse effects on the brain and central nervous system.³⁶

47. Quizalofop-ethyl

CAS# 76578-14-8

Banned by: Norway.

Health effects: Quizalofop-ethyl may be a human carcinogen and can cause reproductive and developmental harm, e.g., birth defects, infertility, sterility and impairment of normal growth and development.

48. Simazine

CAS# 122-34-9

Banned by: Norway, European Union

Health effects: Simazine is described by the U.S. Environmental Protection Agency as a possible human carcinogen. Simazine is also a suspected endocrine disruptor.

49. Sodium chlorate

CAS# 7775-09-9

Banned by: Norway, Sweden.

Health effects: Exposure to sodium chlorate can cause confusion, cough, dizziness, headaches, nausea, sore throat, convulsions, and unconsciousness.

50. Terbacil

CAS# 5902-51-2

Banned by: Sweden.

Health effects: Terbacil is harmful to developmental processes.³⁷

51. Thiabendazole

CAS# 148-79-8

Banned by: Denmark, Slovenia.

Health effects: The US EPA classifies thiabendazole as a likely human carcinogen. Thiabendazole also causes damage to the liver, thyroid, and developmental processes.³⁸

52. Thiophanate-methyl

CAS# 23564-05-8

Banned by: Denmark.

Health effects: The US EPA classifies thiophanate-methyl (TM) as a likely human carcinogen. TM harms the liver, thyroid and testes and also causes adverse developmental and reproductive effects.³⁹

53. Thiram

CAS# 137-26-8

Banned by: Sweden.

Health effects: The US EPA describes thiram as a neurotoxicant and a developmental toxicant (causing severe fetal malformations in laboratory animals). Thiram harms the liver, blood, and urinary systems. Thiram is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.⁴⁰

54. Triadimenol

CAS# 55219-65-3

Banned by: Sweden.

Health effects: The US EPA classifies triadimenol as a possible human carcinogen. Triadimenol is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

55. Triallate

CAS# 2303-17-5

Banned by: Sweden.

Health effects: The US EPA classifies triallate as a possible human carcinogen and a neurotoxicant. Triallate also harms developmental processes.⁴¹

56. Tributyltin oxide

CAS# 56-35-9

Banned by: Denmark, Japan, United Kingdom.

Health effects: Tributyltin oxide is highly toxic, with impacts on the immune system and developmental processes. Tributyltin oxide is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

57. Trifluralin

CAS# 1582-09-8

Banned by: Denmark, Norway, Sweden.

Health effects: The US EPA classifies trifluralin as a possible human carcinogen. Nordic nations banned trifluralin because of its persistence in the environment and toxicity to aquatic species. Trifluralin is also a suspected endocrine disruptor.⁴²

58. Vinclozolin

CAS# 50471-44-8

Banned by: Denmark, Finland, Norway, Sweden.

Health effects: Vinclozolin disrupts hormonal systems resulting in developmental and reproductive problems, including sex organ malformations. The US EPA classifies vinclozolin as a possible human carcinogen.⁴³

59. Zineb

CAS# 12122-67-7

Banned by: European Union. Zineb is not registered for use in the US.

Health effects: Zineb is suspected of being an endocrine disruptor with adverse developmental and reproductive effects.

60. Ziram

CAS# 137-30-4

Banned by: Denmark, Sweden.

Health effects: Ziram is a severe eye irritant and harms the nervous system, liver, and thyroid. The US EPA classifies ziram as “suggestive of carcinogenicity.” Ziram is also suspected of being an endocrine disruptor with adverse developmental and reproductive effects.⁴⁴

ENDNOTES

¹ *Pest Control Products Act*, S.C. 2002, c. 28.

² Comprehensive critiques of the old *Pest Control Products Act* were published by the Law Reform Commission of Canada, the Standing Committee on Environment and Sustainable Development, the federal Commissioner for the Environment and Sustainable Development, environmental organizations, and academics. See Chapter 4.1, “Pesticide Regulation” in David R. Boyd. 2003. *Unnatural Law: Rethinking Canadian Environmental Law and Policy* (Vancouver: UBC Press).

³ Section 17 of the *Pest Control Products Act* is as follows:

Initiation of special review by Minister

17. (1) The Minister shall initiate a special review of the registration of a pest control product if the Minister has reasonable grounds to believe that the health or environmental risks of the product are, or its value is, unacceptable.

Special review where OECD ban

(2) Without limiting the generality of subsection (1), when a member country of the Organisation for Economic Co-operation and Development prohibits all uses of an active ingredient for health or environmental reasons, the Minister shall initiate a special review of registered pest control products containing that active ingredient.

Special review where information from department or province

(3) Without limiting the generality of subsection (1), the Minister shall initiate a special review of the registration of a pest control product if a federal or provincial government department or agency has provided information to the Minister that relates to the health or environmental risks or the value of the product and if, after considering the information provided, the Minister has reasonable grounds to believe that the health or environmental risks of the product are, or its value is, unacceptable.

Request for special review

(4) Any person may request a special review of the registration of a pest control product by making a request to the Minister in the form and manner directed by the Minister.

Decision

(5) Within a reasonable time after receiving a request, the Minister shall decide whether to initiate a special review and shall respond to the request with written reasons for the decision.

⁴ Boyd is the author of “Unnatural Law: Rethinking Canadian Environmental Law and Policy” (UBC Press, 2003) and “Sustainability Within a Generation: A New Vision for Canada” (David Suzuki Foundation, 2004).

⁵ European Commission. 2001. Communication from the Commission to the Council and the European Parliament on the implementation of the Community Strategy for Endocrine Disrupters - a range of substances suspected of interfering with the hormone systems of humans and wildlife. COM (2001) 262.

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www.pesticideinfo.org
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- ⁷ US Agency for Toxic Substances and Disease Registry. 1992. Toxicological Profile for 1,3-Dichloropropene. www.atsdr.cdc.gov
- ⁸ US EPA. 1996. Amitraz: Re-registration Eligibility Decision. www.epa.gov/pesticides
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- ¹⁰ US Agency for Toxic Substances and Disease Registry. 2003. Toxicological Profile for Atrazine. www.atsdr.cdc.gov
- ¹¹ US EPA. 1996. Bromacil: Re-registration Eligibility Decision Fact Sheet.
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- ¹³ US EPA. 1999. Captan: Re-registration Eligibility Decision Fact Sheet.
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- ²² US EPA. 2003. Diuron: Re-registration Eligibility Decision.
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- ²⁴ US Agency for Toxic Substances and Disease Registry. 1990. Toxicological Profile for Ethylene oxide. www.atsdr.cdc.gov
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- ²⁹ US EPA 1994. Maleic Hydrazide: Re-registration Eligibility Decision Fact Sheet.
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- ³⁷ US EPA. 1998. Terbacil: Re-registration Eligibility Decision.
- ³⁸ US EPA. 2002. Thiabendazole: Re-registration Eligibility Decision.
- ³⁹ US EPA. 2004. Thiophanate-methyl: Re-registration Eligibility Decision.
- ⁴⁰ US EPA. 2004. Thiram: Re-registration Eligibility Decision.
- ⁴¹ US EPA. 2001. Triallate: Re-registration Eligibility Decision.
- ⁴² US EPA. 1996. Trifluralin: Re-registration Eligibility Decision.
- ⁴³ US EPA. 2000. Vinclozolin: Re-registration Eligibility Decision.
- ⁴⁴ US EPA. 2004. Ziram: Re-registration Eligibility Decision.