Comments from the David Suzuki Foundation on the options under consideration for managing lawn care and landscape pesticide use in New Brunswick

October 15, 2008

The David Suzuki Foundation supports "Option 3" – new provincial prohibitions on the use and sale of lawn and landscape pesticides, with exemptions only to protect public health and safety. The "cosmetic" use of pesticides to improve the appearance of lawns, gardens, parks, and schoolyards poses unnecessary risks to human health and the environment.

In a systematic review of the epidemiological literature, the Ontario College of Family Physicians found "consistent links to serious illnesses, such as cancer, reproductive problems and neurological diseases" associated with chronic pesticide exposure. Moreover, our own investigation of acute pesticide poisonings in Canada found 319 cases reported by the IWK Regional Poison Centre (covering New Brunswick, Nova Scotia, and Prince Edward Island) in one year.

In addition to human health risks, pesticides also threaten pollinators, helpful insects essential to our food supply. Even small amounts of certain pesticides are known to affect bee longevity, memory, navigation and foraging abilities. Pesticide use in Canada has contributed to declines in native bee populations; most notably in Canada's honey bee populations.

Alternatives products and strategies are available. Indeed, several major retailers have pledged to discontinue sales of conventional lawn and garden pesticides and dedicate their shelf space to safer alternatives. Comprehensive provincial prohibitions will decisively trigger the necessary switch to environmentally preferable landscaping products and strategies. As such, Option 3 is clearly the most effective approach to minimize needless exposure to lawn and landscape pesticides.

We strongly support including prohibitions on the retail sale of cosmetic pesticides in the legislation proposed under Option 3. Banning the use of lawn and landscape pesticides while continuing to allow the retail display and sale of the products in question would send a mixed message and undermine the effectiveness of the policy. It would also make enforcement more difficult.

The experience in Quebec – where restrictions on the use and sale of certain lawn pesticides were introduced in 2003 – clearly indicates the effectiveness of this approach. Statistics Canada reports that the number of Quebec households using pesticides decreased by half between 1994 and 2005, dropping from 30 to 15 percent of those with lawns or gardens.^{iv}

Elements of the "Option 1" and "Option 4" proposals would complement new, comprehensive prohibitions on lawn and garden pesticide use and sale. In particular, pro-active educational initiatives to inform the public, retailers, and landscape professionals about the new policy and about alternatives to pesticides will be important to support effective implementation of new prohibitions.

Likewise, municipalities should be explicitly empowered to regulate pesticide use within their boundaries. Provincial policy in this area should act as a floor, not a ceiling; complementary municipal restrictions on pesticide use should be encouraged. For instance, if provincial prohibitions exempt golf courses, as proposed in the discussion paper, municipalities need clear authority to restrict pesticide use on golf courses within their boundaries to better p

These comments are in keeping with our recent report, co-produced with Équiterre, *Pesticide Free? Oui? An Analysis of Quebec's Pesticides Management Code and Recommendations for Provincial Pesticide Policy.* A copy of this report is attached for your consideration and can also be downloaded at: http://www.davidsuzuki.org/Publications/Pesticide Free Oui.asp.

Thank you for the opportunity to comment on the proposed options for lawn and landscape pesticide policy in New Brunswick.

The David Suzuki Foundation is a national, non-profit, environmental organization, founded in 1990. We use science and education to promote solutions that conserve nature and help achieve sustainability within a generation.

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David Suzuki Foundation, *Northern Exposure: Acute Pesticide Poisonings in Canada*, 2007. http://www.davidsuzuki.org/health/food/poisoning.asp

See: Pesticides: Is Your Local Store Still Selling? (David Suzuki Foundation fact sheet, August 2008) http://www.davidsuzuki.org/files/SWAG/Health/stop pesticidesFINAL.pdf

Statistics Canada, *Households and the Environment*, 2006. http://www.statcan.ca/english/freepub/11-526-XIE/11-526-XIE/007001.pdf