



To PMRA

Re: Re-evaluation of the Lawn and Turf Uses of 2,4-D Reference # PACR2005-01

Founded in 1999, Pesticide Free Ontario (PFO) is a network of over 100 individuals and organizations working to replace the non-essential use of pesticides with sustainable, non-toxic alternatives. PFO works with environmental organizations, labour unions, scientists, health professionals and municipalities to restrict pesticide use on public and private property.

Unlike the Pest Management Regulatory Agency (PMRA), Pesticide Free Ontario believes that the use of 2,4-D to treat lawns and turf poses an unacceptable risk to human health, particularly children, and the environment. Our concerns are as follows:

1. The re-evaluation was released before promulgation of the new Pest Control Products Act meaning Canadians do not have access to all of the studies on which the re-evaluation was based. Given the widespread potential for exposure from this pesticide on urban lawns, it is unacceptable that 2,4-D was re-evaluated under the outdated system of secrecy and corporate protection.
2. Canada's pesticide regulatory system does not take into account the existence of least toxic alternatives for pest control. 2,4-D is used primarily on turfgrass to control broad-leaved weeds such as dandelions. Good cultural practices such as mowing high, over-seeding with appropriate grass types and handweeding are the preferred methods to maintain a healthy lawn as recommended by practitioners of pesticide-free lawn care. With federally registered least toxic herbicidal products such as corn gluten meal (Sept. 2003) proving to be 83% effective at controlling broad leaf weeds, 2,4-D should not be approved for home lawn use. It is a clear contradiction of the objective of Health Canada's Healthy Lawn Strategy with its "particular emphasis on pest prevention, use of reduced risk products and application of pesticides only when necessary."
3. Improved labeling will not protect Canadians from the adverse effects of 2,4-D. In her 2003 report to the House of Commons, the Commissioner of the Environment and Sustainable Development stated that the PMRA assumes pesticide users will follow label instructions. However, the Agency's own compliance reports show that pesticide users may not follow label directions. Protection of our most vulnerable populations - fetuses, infants, children, seniors and those suffering from environmental illnesses and suppressed immune systems - will not be best achieved by reading label directions.

The PMRA underestimates the risks of pesticide use because the actual impact of user's practices on human health and the environment are not measured.

PFO notes that pesticide label violations are the norm rather than the exception:

- a) The 2,4-D label states "Keep out of the reach of children" yet retail outlets continue to

store products containing 2,4-D on the floor. In some instances, bags of granular weed and feed products are ripped and the contents easily accessible to toddlers and young children.

b) Applicators are told to wear long-sleeved shirts, long pants, protective eyewear and gloves. Standard clothing for many pesticide applicators is short-sleeved T-shirts and shorts.

c) The label also states that two applications per year of 2,4-D are sufficient and the PMRA assumes in the re-evaluation that this is the application norm. However, many chemical lawn care companies provide three applications of 2,4-D in their standard programs and also advertise guaranteed weed control in their packages that can exceed that. Situations like these prove that the PMRA is not including real-life practices in its decision making process.

d) PFO does not believe that any parent would willingly expose their child to a product that may cause adverse effects such as severe eye irritation, coughing, burning, dizziness, temporary loss of muscle coordination, fatigue, muscle weakness or nausea as listed on the 2,4-D label. Allowing the continued use of 2,4-D on the lawns where the children of Canada play is in direct conflict with the stated goal of Health Canada, which is to maintain and improve our health.

4. PFO is concerned about the weight given to the value of 2,4-D. PMRA rejects dicamba, mecoprop and MCPA as replacements for 2,4-D but does not appear to have considered the least toxic products and practices, mentioned above, that are used successfully by individuals and organic lawn care services.

5. The most recent reference cited is dated 1976. Research about pesticide free lawn care has exploded in the past 10 years. In assessing the value of 2,4-D, PMRA must rely on current evidence not outdated materials. Reliance on out-of-date research leaves us with the impression that the chemical lawn care industry's potential lost profits are carrying greater weight than the protection of health and the environment.

6. PFO is concerned about dioxin contamination in products containing 2,4-D. Unless products containing 2,4-D are randomly and independently tested at regular intervals, there is no evidence that dioxin contamination is not present. PMRA is requesting data from manufacturers to confirm the absence of some forms but not all forms of dioxin. It is unacceptable to allow the continued use of 2,4-D on turf with this significant data gap. The only acceptable amount of dioxin – any type of dioxin – is zero.

7. The re-evaluation notes, “a preliminary study reported fewer fetal implantations in 2,4-D treated rats (sic), errors in the study design negated the study authors' interpretation (Cavieres et al 2002).” (p.9). This peer reviewed study of mice treated with very low levels of off-the-shelf 2,4-D resulting in lowered fertility is preliminary evidence of the dangers of exposure to 2,4-D. Could PMRA please provide PFO with the evidence to justify the dismissal of this study?

8. We also note that the bystander study carries a lot of weight in the re-evaluation. Could PMRA provide PFO with the details of studies that have replicated the findings of the Solomon studies?

Pesticide Free Ontario believes that the use of 2,4-D on home lawns in Canada must stop immediately. There are effective and non-toxic alternatives. Perhaps PMRA considers the health

dangers linked to exposure to 2,4-D to be acceptable but we, the member organizations of Pesticide Free Ontario, do not. It is time for Health Canada to practice the precautionary principle protect the health of Canadians.

Yours truly,

PFO Steering Committee

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