



12 December 2019

Nalisha Asgarali
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Toronto, ON M4V 1M2
submitted via email: Nalisha.Asgarali@ontario.ca

Re: CPCHE reponse to proposed amendments to Ontario Pesticide Regulation (ERO # 019-0601)

Dear Nalisha Asgarali,

The **Canadian Partnership for Children's Health and Environment (CPCHE)** welcomes the opportunity to comment on the proposed amendments to Ontario Pesticide Regulation (63/09 General).

CPCHE is a national collaboration of organizations with overlapping missions that have been working together for nearly two decades to improve children's environmental health in Canada (www.healthyenvironmentforkids.ca). Our aim is to increase awareness, mobilize knowledge and catalyze action on children's environmental health issues, with a specific focus on preventing/reducing exposures to toxic chemicals and pollutants during the vulnerable stages of fetal and child development. CPCHE's rigorous adherence to facts and scientific evidence has positioned it as a respected source of children's environmental health information and policy direction.

Our overriding concern is to ensure that the people of Ontario – and specifically children and others who may be particularly susceptible to adverse health effects of pesticide exposures – are optimally protected from unnecessary use of pesticides. **Specifically, we urge the Government of Ontario to ensure that the ban on cosmetic use of pesticides in Ontario remains robust and is not weakened by subsequent revision of the list of exempted chemicals.** We are concerned about the proposal to give discretionary power to the Director within MECP to add pesticides to the list of those exempted from the ban. Any such revisions to allow additional pesticides to be used for cosmetic purposes would warrant a robust and transparent process, with input from expert advisors from all relevant sectors, including public health and the medical community, and the existing Ontario Pesticides Advisory Committee (OPAC). The retention of OPAC is important to ensure consistent multi-disciplinary advice on any such revision of pesticides policy and management.

We strongly support the government's stated commitment to retain the cosmetic pesticides ban. However, we are concerned that proposed revisions to the criteria that will guide the Director's future decisions could allow the cosmetic ban to be undermined.

The cosmetic pesticides ban is a cornerstone of precautionary environmental health policy in Ontario. Any weakening of those protections will potentially increase pesticides exposures for children, pregnant women and prospective parents, with the potential for corresponding risks to preconception and prenatal health and healthy child development. A growing body of scientific evidence points to known and suspected harms of even low-dose exposures to toxic substances, including pesticides, during these vulnerable life stages. As such, we are very concerned with the proposed wording in section 17.(1) that the Director could determine

that "...an active ingredient is appropriate for use for a cosmetic purpose..." if "[t]he products in which the active ingredient is contained are unlikely to be used in a manner that is likely to cause significant exposure to humans." In a world of multiple chemical exposures, CPCHE strongly supports progressive public policy that eliminates needless exposures, like the cosmetic use of pesticides.

We also urge the Government to retain the provisions that are now in place to limit the use of neonicotinoid-treated seeds and to track their sale and use. Pollinator health and the viability of ecosystems are essential to the health and well-being of our children, now and into the future. It is important that researchers and risk assessors have comprehensive data on historical and current neonicotinoid use in order to determine environmental exposures and ultimately, impacts to ecosystem health. The consultation document states that the proposed regulatory changes are not expected to have significant environmental impacts. However, the proposed changes related to neonicotinoid-treated seed will very likely lead to increased use. This change will eliminate important progress made over the last five years towards the goal, apparently now abandoned, of achieving an 80 percent reduction in acreage of neonicotinoid-treated corn and soybean fields. As a Province, we should be seeking ways to further reduce the use of pollinator-harming pesticides, building on the measures that are already in place.

The recently-released Auditor General of Ontario's 2019 report underscores the need for proactive pesticides regulation. The report notes that between 2014 and 2018, 76 out of 1,200 samples of Ontario-grown produce tested by the Ontario Ministry of Agriculture had pesticide residues that exceeded Health Canada's allowable limits. CPCHE recommends that the Government of Ontario work across ministries (Environment, Conservation and Parks; Agriculture; Health) to ensure public health protection through legislation that minimizes use and exposure to pesticides.

Collectively, the CPCHE partner organizations urge the Government of Ontario to reconsider the proposed changes to Pesticides Regulation 63/09. As a society, we should be seeking continual improvements in the protection of children and the general public from unnecessary toxic exposures. As currently written, the proposed amendments seem to promise the opposite. The proposed revisions would place important preventive policy gains into jeopardy and very likely increase, rather than decrease, environmental exposures and associated health risks for present and future generations.

Yours sincerely,



Erica W. Phipps
Executive Director

Canadian Partnership for Children's Health and Environment (CPCHE) – Partner Organizations

