

March 29, 2021

Re: Public Notice for Pesticide Control Programs conducted by the Province of Manitoba within right of ways. (Public Notice attached)

Attention:

Manitoba Conservation and Climate
Environmental Approvals Branch
1007 Century Street
Winnipeg MB R3H 0W4

We oppose the use of any of the listed herbicides/pesticides to control the growth of plants on Manitoba Provincial right of ways.

We are particularly concerned about the carcinogenic herbicide glyphosate, now banned or restricted in over 20 countries worldwide^{1 2}; dicamba, a highly volatile chemical that can damage non-target plant species through drift and volatilization (note, a recent US Court of Appeal ruling has forced US EPA to prohibit 3 specific dicamba products³); and, 2,4-D, one of 2 ingredients used in Agent Orange and a known endocrine disruptor.⁴

While the Pest Management Regulatory Agency of Health Canada is responsible to determine whether a pesticide can be registered for use in Canada, they use a risk based approach in their assessments and not the precautionary principle⁵.

A Province or Territory has the legislative and regulatory authority to prohibit the use of a registered pesticide in its jurisdiction, or it may add more restrictive conditions on the use of a product than those established under the Pest Management Regulatory Agency.⁶

It is now well scientifically documented in Manitoba and in the prairies that pesticides are escaping into the environment and are being detected in our surface and groundwater.^{7 8 9 10}

¹ Glyphosate Herbicides Now Banned or Restricted in 21 Countries Worldwide – Sustainable Pulse Research, <https://sustainablepulse.com/>

² Navdanya International, <https://navdanyainternational.org/publications/glyphosate-bans-restrictions-across-the-world/>

³ Minnesota Department of Agriculture – Dicamba Herbicide, <https://www.mda.state.mn.us/dicamba>

⁴ Beyond Pesticides Factsheet on 2,4-D <https://www.beyondpesticides.org/assets/media/documents/pesticides/factsheets/2-4-D.pdf>

⁵ The Statutory Review of the Pest Control Products Act, Report of the Standing Committee on Health. April 2015, 41st Parliament, Second Session

<https://www.ourcommons.ca/Content/Committee/412/HESA/Reports/RP7937703/hesarp10/hesarp10-e.pdf>

⁶ Pesticide Regulations Across Canada, Canadian Urban Landscape Association (undated), <https://cnla.ca/learn/pesticide-regulations-across-canada>

Thank you, we look forward to your response.

Signed,

Camp MorningStar

Hog Watch Manitoba

Manitoba Eco-Network

Manitoba Energy Justice Coalition

Manitoba Nurses for the Environment

Manitoba Wildlands

Mixedwood Forest Society

Organic Food Council of Manitoba

People for the Preservation of Willow Island Coastal Islands

⁷ Sheedy, C. et al, From peaks to prairies: a time-of-travel- synoptic survey of pesticides in watersheds of southern Alberta, Canada. *Inland Waters* Vol 9, 2019 – Issue 4 <https://www.tandfonline.com/doi/full/10.1080/20442041.2019.1634947>

⁸ Sapkota, K., Pesticide Residues in Groundwater and Soil of a Prairie Province in Canada, Master of Science Thesis, Department of Soil Science, University of Manitoba. May 2017.

<https://mspace.lib.umanitoba.ca/bitstream/handle/1993/32189/Final%20Thesis%20Revised.pdf?sequence=3&isAllowed=y>

⁹ Wong, Charles S. et al., Inputs, source apportionment, and transboundary transport of pesticides and other polar organic contaminants along the lower Red River, Manitoba, Canada. *Science of Total Environment* 635 (2018) 803-816

¹⁰ Gamhewage, M. I., Pesticides in the Water-Colum and Bottom Sediments of Four Manitoba Rivers, Master of Science Thesis, Department of Soil Science, University of Winnipeg 2020.