



MANITOBA ECO-NETWORK

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Good evening,

My name is Glen Koroluk and I am the Executive Director of the Manitoba Eco-Network.

Since 1988, Manitoba Eco-Network has promoted positive environmental action by supporting people and groups in our community. Our programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba's environment for the benefit of current and future generations.

We are disappointed with Bill 22 and ask that this Bill be withdrawn. It is a step backwards in a time when we know we have to reduce exposure to chemical pesticides. There is ample evidence in the form of scientific and independent peer-reviewed research that conclude chemical pesticides impact human health, the environment (especially our aquatic ecosystems), and biodiversity.

Environment & Climate Change Canada's own website states that, households use chemical pesticides and fertilizers to improve the look of their lawns and gardens. These chemicals can pollute lakes and rivers that may be sources of drinking water for some communities. Chemical pesticides are also toxic to many

forms of life and can threaten beneficial species, such as bees that are important pollinators.¹

According to the Canadian Association of Physicians for the Environment (CAPE), to protect human and environmental health and safety, the control of pests should center on fundamental principles of public health & environmental protection including the application of the precautionary principle, harm or hazard prevention, health promotion, and environmental justice.²

Furthermore, CAPE emphasizes that exposure to non-essential pesticides creates additional costs for the province's health care system and affects the lives of those who struggle with illnesses and conditions associated with such pesticide exposures.³

As we know, there are shortcomings as to how the Pest Management Regulatory Agency (PMRA) of Health Canada registers and regulates pesticides. The Pest Management Regulatory Agency uses a risk-based approach in their assessments and not the precautionary principle.

¹ Government of Canada, Household use of chemical pesticides and fertilizers. <https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/household-use-chemical-pesticides-fertilizers.html> Accessed Oct 5 2022.

² Canadian Association of Physicians for the Environment, Letter to City of Edmonton City Council, re: Elimination of Cosmetic Pesticides. <https://cape.ca/wp-content/uploads/2022/08/CAPE-Statement-of-Support-for-a-Cosmetic-Pesticide-Ban-by-Edmonton-Council-August-2022.pdf>

³ Canadian Association of Physicians for the Environment, Letter to Rochelle Squires, Manitoba Minister of Sustainable Development, re: legislation on non-essential uses of pesticides. <https://cape.ca/wp-content/uploads/2019/01/Manitoba-Pesticides-Article-October-18-2018.pdf>



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As pointed out by the Standing Committee on Health in their statutory review of the Pest Control Products Act, “a lack of evidence of risk is not the same thing as evidence of no risk.” The onus must be on the manufacturer to prove there are no health risks. ⁴

As noted by Ecojustice Canada, the European Union achieves this balance. If proof of the product’s safety is not supplied, then it will not be registered there.⁵

For this reason and others, that is why a province, territory, municipality, or Indigenous government 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.

Health Canada's Pest Management Regulatory Agency is currently undergoing a transformation process that will strengthen its oversight and its protection of human health and the environment. The transformation process will also make the PMRA more transparent to people in Canada. ⁶

The European Union’s 2020 Biodiversity Strategy includes proposals for legally binding targets to reduce pesticide use and risk by 50 per cent by 2030, as well as a ban on the use of

⁴ House of Commons, Statutory Review of the Pests Control Products Act 2105. Report on the Standing Committee on Health. 41sr Parliament, Second Session April 2015.

⁵ Ibid.

⁶ Protecting human health and the environment: Transforming the Pest Management Regulatory Agency. <https://www.canada.ca/en/health-canada/corporate/about-health-canada/branches-agencies/pest-management-regulatory-agency/transforming.html#a2>

pesticides in protected areas and other ecologically sensitive areas.

As stated by the European Commission, “[The] proposal to reduce the use of chemical pesticides translates [their] commitment to halt biodiversity loss in Europe into action.”⁷

Canada must match this commitment and establish a legislative framework for achieving pesticide use reduction targets.

Unfortunately, Bill 22 sends Manitoba into the wrong direction.

Thank you

Glen Koroluk
Executive Director
October 5, 2022

⁷ Joint Letter to the Government of Canada, re: Review of federal pesticide law must focus on protecting human health and the environment. June 2022, <https://cape.ca/wp-content/uploads/2022/09/Centre-PCPA-review-on-protecting-health-and-environment-June-2022-rev.pdf>