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May 14, 2004

Implementation of Toronto's Pesticide By-law

Dear Councillor,

The Ontario Public Health Association (OPHA) is a volunteer, non-profit organization that represents public health nurses and nutritionists, health promoters, health inspectors, epidemiologists, toxicologists, researchers, policy analysts and doctors who work in public health departments and community health centres across Ontario. As an organization that works to protect and promote health and as an active member of the Canadian Partnership on Children's Health and Environment (CPCHE), we urge you to support the phase-out and eventual elimination of non-essential pesticide use as called for in the City of Toronto's Pesticide By-law. Specifically, we ask that you:

1. Adopt the recommendations for by-law implementation put forward by the Chief Administrative Officer in the *Pesticide By-law Advisory Committee Report to Assist in the Implementation of the City's Pesticide By-law* as they represent an excellent starting point from which to protect people, and especially children, from the harmful effects associated with exposure to pesticides;
2. Recommit to the 1998 public lands phase-out policy, that includes sports fields and naturalized areas; and
3. Re-establish a permitting system to monitor and regulate pesticide use for infestations as has been done in other cities such as Halifax, Hudson and Montreal where residents must apply for permits in order to ensure that specific infestation criteria are met before pesticides can be applied

Pesticide use poses an unnecessary risk to health

OPHA's 2002 Resolution on the Non-essential Use of Chemical Pesticides on Public and Private Lands (available at www.opha.on.ca/ppres/2001-02_res.pdf) outlines our organization's position on pesticides. It states that the use of pesticides for cosmetic purposes poses an unnecessary risk to human health. In it, OPHA members conclude that in order to protect human health, we must act quickly to restrict non-essential pesticide use and make use of safer alternatives. A wide variety of other organizations, including the Canadian Cancer Society, the Learning Disabilities Association of

Canada and the Canadian Association of Physicians for the Environment have also taken strong positions against the cosmetic use of pesticides due to their effects on health. Most recently, the Ontario College of Family Physicians issued a report that finds a strong correlation between the use of lawn and garden pesticides and a number of serious health outcomes including cancer, birth defects, Parkinson's Disease and Lou Gehrig's disease. It identifies children and pregnant women as populations that are particularly vulnerable to the harmful effects of pesticides.

Children are particularly vulnerable to the harmful effects of pesticides

Children are particularly vulnerable to the harmful effects of pesticides because their bodies and brains are growing and developing quickly. Exposure to substances that affect developing organs and body systems can cause damage that lasts a lifetime. Children can experience greater exposure to pesticides than adults. Pound for pound they eat more food, drink more water and breathe more air than adults. They also spend more time outdoors, are more likely to play on lawns, put their hands in their mouths more often, and are less likely to wash their hands regularly than adults. These physiological and behavioural differences put children at increased risk to the health outcomes associated with pesticides including non-Hodgkin's lymphoma, leukemia, and possibly brain cancer. Research also shows that pesticides can also affect brain development and functioning. The non-essential use of pesticides can also affect family pets, wildlife and the natural environment.

In recognition of the potential for harm presented by pesticides, a growing number of Canadian municipalities have passed and are implementing strong pesticide by-laws that reduce the use of chemical pesticides. Large cities such as Montreal and Halifax have implemented and enforced pesticide by-laws and succeeded in keeping their parks, sports fields and public spaces beautiful. The residents, and particularly the children of Toronto deserve the same level of protection.

The Toronto By-Law is a powerful tool that can be used to protect public health. We feel strongly that the By-Law should not be weakened by exemptions and lowered thresholds. The City of Toronto is in a position to establish a standard with respect to non-essential pesticide use through the implementation of a strong pesticide by-law that results in reduced exposures to pesticides for City residents.

Please protect Toronto's children by making sure that the by-law remains true to its spirit and intent by adopting the recommendations contained in the report put forward by the City's Chief Administrative Officer.

Sincerely,

Peter Wiebe
President