

October 6, 2022

Honourable Jeff Wharton
Minister of Environment, Climate and Parks
Room 344 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Honourable Audrey Gordon
Minister of Health
Room 302 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8

Via email

RE: Bill 22 – The Environment Amendment Act (Pesticide Restrictions)

Dear Minister Wharton and Minister Gordon,

I write to you on behalf of Animal Justice, the Winnipeg Humane Society, The Little Red Barn Micro Sanctuary, World Animal Protection, Wildlife Haven Rehabilitation Centre, Free From Farm Sanctuary, Save A Dog Network Canada, Humane Society International/Canada, The Fur-Bearers, D’Arcy’s Animal Rescue Centre, and Manitoba Animal Save. As animal protection groups, rescue organizations, sanctuaries, and rehabilitation organizations operating in Manitoba and nationally, we strongly oppose Bill 22, *The Environment Amendment Act (Pesticide Restrictions)*. This dangerous and regressive Bill would put wild and domesticated animals throughout the province at risk of illness, and even death, by eliminating many of Manitoba’s restrictions on the cosmetic, or non-essential, use of pesticides. These risks to animals are in addition to the serious risks that Bill 22 poses to the environment and human health, including the health of children and other vulnerable Manitobans in particular.¹ Loosening restrictions on the use of cosmetic pesticides is a dangerous and unreasonable move that is counter to the clear and overwhelming scientific evidence about the need to reduce the use of harmful pesticides.

We request that the current restrictions on non-essential uses of pesticides be maintained. Rather than allowing for the use of more toxic pesticides, Manitoba should consider ways to strengthen its existing pesticide restrictions in order to protect our environment, as well as the well-being of both humans and animals.

Cosmetic Pesticide Use Poses Serious Risks to Animals

A growing body of scientific research indicates that exposure to chemical pesticides poses serious risks to human health, including cancer and neurological disorders, as well as adverse

¹ Some of these risks are set out in an open letter to you from health and environmental organizations, including the Manitoba College of Family Physicians, Manitoba Lung Association, Learning Disabilities Association of Manitoba, and the Canadian Association of Physicians for the Environment, available online: <https://cosmeticpesticidebanmb.files.wordpress.com/2022/06/cpbm-letter-to-ministers-june-28-2022.pdf>.

reproductive, developmental, and respiratory outcomes.² Risks are particularly high for children and other vulnerable populations. Pesticides are toxic to plants and animals by design, and contribute to a range of environmental harms such as biodiversity loss, drastic declines in insect populations, and soil and water pollution.³

Similarly, the use of certain pesticides has been shown to harm and even kill non-target animals, and to cause adverse health outcomes in wild and domesticated animals, including cancer, endocrine disruption, neurotoxicity, birth defects, and developmental changes.⁴ For instance, organophosphates and carbamates — among the most widely used pesticides today — are acutely toxic to birds and many other animals, often at very low levels.⁵ Pesticides have been shown to adversely affect animals throughout the ecosystem, including songbirds, birds of prey, fish, and numerous endangered species, as well as companion animals such as cats and dogs.

Animals can suffer from acute poisoning (i.e. short exposures that kill or sicken animals), chronic poisoning (i.e. cumulative exposure over time), and secondary poisoning (i.e. consuming plants or prey that have been exposed to pesticides), as well as a range of indirect effects on ecosystems, such as the availability of insects or plants that a species relies upon for food and decreasing numbers of pollinators needed to pollinate plants.⁶ Wild and domesticated animals are impacted through a range of mechanisms, including by being sprayed directly during application, as well as through pesticide drift, consuming exposed plants or animals, or through runoff into waterways.

Animals, like children, are particularly susceptible to adverse health effects caused by the non-essential use of pesticides on grass and other plants due to factors such as their small size and their tendency to be close to the ground. Domesticated animals, including companion animals,

² See, e.g. Nicolopoulou-Stamati P, Maipas S, Kotampasi C, Stamatis P, Hens L. Chemical Pesticides and Human Health: The Urgent Need for a New Concept in Agriculture. *Front Public Health*. 2016 Jul 18;4:148. doi: 10.3389/fpubh.2016.00148. PMID: 27486573; PMCID: PMC4947579; Liu J, Schelar E. Pesticide Exposure and Child Neurodevelopment: Summary and Implications. *Workplace Health & Safety*. 2012;60(5):235-242. doi: [10.1177/216507991206000507](https://doi.org/10.1177/216507991206000507)

³ See, e.g. Carsten A. Brül & Johann G. Zaller, Biodiversity Decline as a Consequence of an Inappropriate Environmental Risk Assessment of Pesticides *Front. Environ. Sci.*, 31 October 2019 Sec. Toxicology, Pollution and the Environment, <https://doi.org/10.3389/fenvs.2019.00177>; Aktar MW, Sengupta D, Chowdhury A. Impact of pesticides use in agriculture: their benefits and hazards. *Interdiscip Toxicol*. 2009 Mar;2(1):1-12. doi: 10.2478/v10102-009-0001-7. PMID: 21217838; PMCID: PMC2984095.

⁴ See, e.g. Catherine F. Wise, Stephanie C. Hammel, Nicholas J. Herkert, Maria Ospina, Antonia M. Calafat, Matthew Breen, & Heather M. Stapleton, Comparative Assessment of Pesticide Exposures in Domestic Dogs and Their Owners Using Silicone Passive Samplers and Biomonitoring. *Environ. Sci. Technol*. 2022, 56, 2, 1149–1161 <https://doi.org/10.1021/acs.est.1c06819>; https://www.eap.mcgill.ca/MagRack/JPR/JPR_14.htm; <https://www.manitobacooperator.ca/daily/u-of-s-research-reveals-controversial-insecticides-are-toxic-to-songbirds/>

⁵ See, e.g. https://www.beyondpesticides.org/assets/media/documents/pesticidefreelawns/resources/DWDangers_Pesticides_Wildlife.pdf.

⁶ See, e.g. <https://pesticidestewardship.org/non-target/pesticide-impact/>

often chew or eat grass and other plants, and may also roll or lie on such vegetation, leading them to ingest pesticides when they lick their fur during grooming.⁷ Wild animals are particularly susceptible to pesticides used in both urban and rural areas, since they rely on the natural environment for food, water, and shelter.

Exposure to pesticides can also occur indoors when substances are tracked in on individuals' shoes or on companion animals' paws. This source of exposure also disproportionately impacts companion animals, as well as small children and babies who are more sensitive to the effects of pesticides due to their small size and their inclination to put toys, fingers, and other things in their mouths.⁸

Manitoba Should Maintain its Restrictions on Non-Essential Pesticides

Scientific evidence is clear that many pesticides pose serious risks to the health of animals, as well as to humans and the natural environment. Increasing the non-essential use of these products in Manitoba would be egregiously irresponsible and unscientific. As such, Bill 22 would violate the precautionary principle of international and domestic environmental law, which mandates that, where scientific evidence shows there is a risk of serious or irreversible environmental harm, preventative action be taken to protect the environment and human health, even where there is scientific uncertainty about the risks at issue. Bill 22 would also violate the principle of non-regression — an increasingly recognized principle of environmental law that protects vulnerable human populations and ecosystems by prohibiting governments from weakening or rolling back environmental laws and regulations.⁹

We urge you to protect domestic and wild animals across the province and withdraw Bill 22. Cosmetic pesticide bans work, and are being increasingly adopted in jurisdictions across Canada and around the world. Increasing the use of cosmetic pesticides would set Manitoba apart as an outlier and fly in the face of increasing recognition of the need to adopt a One Health approach that reflects and protects the interconnectedness of the health of humans, animals, and the environment on which we all depend.

Sincerely,

Animal Justice

The Winnipeg Humane Society

⁷ Winnipeg Humane Society, <https://winnipeghumaneociety.ca/animal-issues/ban-on-cosmetic-pesticides/>

⁸ See <http://npic.orst.edu/health/child.html>

⁹ Bryner, Nicholas, Never Look Back: Non-Regression in Environmental Law (February 28, 2021). University of Pennsylvania Journal of International Law, Forthcoming, Available at SSRN: <https://ssrn.com/abstract=3947359>

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