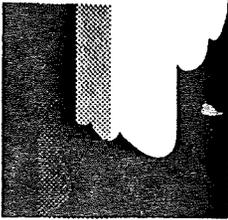


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Canadian Environmental Law Association
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January 23, 1991

VIA FAX

Councillor Mario Gentile
Chair, Metro Parks, Recreation and Property Committee
c/o Madeline Brown
390 Bay Street
5th Floor
Toronto, Ontario
M5H 3Y7

Dear Mr. Gentile,

Re: Use of pesticides on Metro Parks property

We understand that on January 28th, your committee will be considering a request from Councillor Ila Bossons that Metro set an example in banning the use of herbicides and pesticides on all Metro Parks property using a combination of non-chemical maintenance alternatives.

Unfortunately, due to scheduling constraints, we are unable to appear before your committee on this issue. We would however like to strongly encourage you to take up this challenge. Several precedents exist in other jurisdictions to discontinue the use of chemical weed control methods in public parks. These decisions have been made in response to controversy surrounding the long-term public health consequences of the substances used and widespread public concerns about what is seen as unnecessary environmental contamination.

Pesticides are the one class of chemicals that are designed to be toxic and generally dispersed into the environment. In addition, pesticides have demonstrated negative impacts on soil ecosystems, water quality, non-target species, and human health. It is widely recognized that the extensive use of pesticides in our society can and should be reduced. This recognition is reflected in the policy of the Ontario Government to reduce synthetic pesticide use by 50% over 15 years, effective from January 1988. The federal government has also indicated in its Policy Document "Strategic Directions to 1990" that initiatives are being undertaken to "reduce farmers' dependence on chemical pesticides and undertake an integrated pest management study". Similar initiatives are underway in other provinces and in the United States.

The recent report of the Pesticide Registration Review Team, (a multistakeholder committee advising the federal Minister of Agriculture) entitled "Recommendations for a Revised Federal Pest Management Regulatory System" recommended a new regulatory system

that would have as one of its attributes "support for the development of sustainable systems that reduce, wherever possible, the need for the use of pest control products". The report also recommends new legislation that would establish a Pest Management Promotion Office to, among other things:

- "promote measures to discourage the non-judicious use of pesticides;
- taking into consideration available and potential pest management strategies that are viable, set targets and establish workplans for the reduction of use of pesticides in all use sectors, including agriculture, forestry, industrial, commercial, lawn and turf, and domestic sectors, following appropriate consultations."

Every year in our office, nothing heralds the coming of spring more than the dramatic increase in the number of telephone calls from people concerned about and opposed to widespread pesticide spraying. These people are particularly irate that this chemical spraying is occurring almost entirely for cosmetic purposes and that less toxic or non-toxic alternatives exist. We are aware of, and have in our library and research files, extensive information on the alternative means of maintaining lawns and gardens without constant chemical input. While some costs can be higher using these alternatives, the long-term benefits include greater overall diversity, stability and health of these environments as well as a reduction in the human health risks from exposure to toxic chemicals.

We would like to encourage your Committee to direct the Metro Parks, Recreation and Property Department to investigate the options available to put in place this ban or near-total ban for the Spring of 1991. We can offer the use of our Public Resource Centre in your efforts as well as referrals to organizations expert in these areas. In addition, we encourage you to ensure that opportunity exists for public review and comment on the results of this research to enhance the quality and public acceptability of the final options chosen.

We look forward to hearing of your committee's deliberations.

Yours very truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION


Kathy Cooper
Researcher