

July 24, 2010

The Honourable Bill Blaikie  
Minister of Conservation  
Legislative Building  
Winnipeg, Manitoba  
R3C 0V8

Dear Mr. Blaikie:

I am writing to express my concerns regarding the City of Winnipeg's request for amendments to the Pesticide Use Permit for 2010 (No. 2010052).

The City of Winnipeg has proposed changes that will significantly increase citizens' exposure to malathion, a synthetic pesticide that is associated with serious health risks. These changes should not be granted without a thorough, evidence-based review by the Province and sufficient opportunities for public consultation. Good environmental policy requires that the public has a reasonable opportunity to comment on practices that affect their health or the environment. In considering the City's request for changes to its Pesticide Use Permit, the Province must exercise due diligence to ensure that the proposed changes are both effective for mosquito control and respectful of any citizen's requirement to avoid exposure to malathion.

The changes proposed by the City of Winnipeg would result in more frequent adult mosquito fogging, reduced warning times given to residents and smaller buffer zones. The City has not provided evidence that these changes are necessary for increasing the effectiveness of its mosquito control program. These changes would also unjustly limit the rights of citizens to protect themselves and their families.

The proposed changes are a shift away from the "best practices" described in the City Administration's own report. Dave Domke, in the Administration Report prepared for Winnipeg City Council on July 21, 2010, writes:

"The base requirement of having three consecutive days of a minimum of 25 nuisance mosquitoes has been in place in Winnipeg since 1969, and is based on the biology and emergence rates of adult mosquitoes. Furthermore, this is an international standard from the American Mosquito Control Association that most jurisdictions use."

I believe the Province would need to provide a justification for any departure from best practices. At this point such justification is absent.

Similarly, the proposal to reduce the size of the buffer zones is not supported by any evidence that this would improve the effectiveness of the mosquito control program. The choice of 100m for the radius of the buffer zone was based on published studies showing that the reach of the pesticide material when applied from trucks at ground level is approximately 100m. In fact, more recent research by the BC Centre for Disease Control

found that drift from ground-based application can occur up to 490m. It is clear that reducing buffer zone size negates their purpose in protecting citizens from exposure to malathion. If the Province approves smaller buffer zones, I believe it would show a reckless disregard for the legitimate health concerns of citizens. In particular, reducing the buffer zone to the size of an objector's property, as suggested in your July 21, 2010 letter to the City, would render the buffer zone meaningless in terms of protection.

Failure to provide even the minimal accommodation of a 100m buffer zone to people with demonstrated disabilities such as environmental sensitivity, compromised immune system or respiratory disease may well constitute a breach of the Canadian Human Rights Act. It also fails to respect those citizens who wish to protect young children (a population that is particularly vulnerable to pesticide impacts), as well as other family members and themselves from the effects of this chemical.

Surely you and your officials are aware that that malathion, while registered by Health Canada, is not an innocuous substance. There is increasing evidence that recurring exposure to even low levels of pesticides is associated with serious health risks, particularly in young children. According to the U.S. Environmental Protection Agency, there is "suggestive evidence" that malathion causes cancer. Recent studies provide stronger evidence: a commercial malathion insecticide caused breast cancer in laboratory animals, and malathion use by farmers is associated with an increased incidence of a type of cancer, non-Hodgkin's lymphoma.

Malathion concentrations of several parts per billion (ppb) harm fish: in studies, less than 1 ppb disrupted behavior, 4 ppb killed sensitive species, 10 ppb caused gill damage, and 20 ppb affected swimming ability. In laboratory tests with birds, malathion disrupted normal thyroid hormone function and caused genetic damage. Also, bird populations have decreased after malathion spraying because their insect food is killed.

Based on mosquito trap counts from last year, the City's recommendations, if approved by the Province, could result in virtually continual fogging for the entire summer, thus greatly increasing population and environmental exposure to this chemical.

I therefore respectfully request that you do not acquiesce to the City's recommendations 1 to 3. I am in support of the Province providing increased funding to assist the City to move to 100% biological larviciding.

I look forward to your response.

Yours truly,