





To: Public Works and Transportation Committee **Date:** December 10, 2020
From: Peter Russell **File:** 10-6160-06/2020-Vol
Director, Sustainability and District Energy 01
Re: **Banning Rodenticides on City-owned Property in Richmond**

Staff Recommendation

1. That the City discontinue the use of rodenticides on city-owned property for one year, as described in the staff report titled “Banning Rodenticides on City-owned property in Richmond,” dated December 10, 2020 from the Director, Sustainability and District Energy;
2. That staff assess the outcomes of the one-year ban on city-owned property and report the findings to Council;
3. That staff be directed to develop an integrated rodent management program, as described in the staff report titled “Banning Rodenticides on City-owned property in Richmond,” dated December 10, 2020 from the Director, Sustainability and District Energy;
4. That staff be directed to write a letter to the provincial Ministry of Environment, requesting that a review of the province’s existing policies that allow for the retail sale of rodenticides be conducted; and
5. That the 2021 rodent management transition program be endorsed with funding in the amount of \$67,000, from the Sanitation and Recycling Provision, and be included in the Consolidated 5 Year Financial Plan (2021-2025).

Peter Russell
Director, Sustainability and District Energy
(604-276-4130)

Att. 2

REPORT CONCURRENCE		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Law	<input checked="" type="checkbox"/>	 <hr/>
Parks Services	<input checked="" type="checkbox"/>	
Facility Services	<input checked="" type="checkbox"/>	
Finance	<input checked="" type="checkbox"/>	
Environmental Programs	<input checked="" type="checkbox"/>	
SENIOR STAFF REPORT REVIEW	INITIALS: <i>Mo</i>	APPROVED BY GAO  <hr/>

Staff Report

Origin

At the July 20, 2020 General Purposes Committee meeting, staff received the following referral:

“That the matter of banning the use of anticoagulant rodenticides be referred back to staff conduct an analysis and report back on:

- a) Rodent management practices in Richmond;*
- b) Jurisdictional limits;*
- c) Partnering opportunities with Richmond School Board and Vancouver Coastal Health; and,*
- d) Consequences and associated cost.”*

Council also received the memorandum “Vancouver Coastal Health - Termination of Service Agreement”, dated November 30, 2020, informing of Vancouver Coastal Health’s notice of intention to terminate an existing Service Agreement effective March 30, 2021 (Attachment 1).

This report responds to the referral on the matter of banning the use of anticoagulant rodenticides in Richmond by outlining the current regulatory framework related to rodenticide in BC, describing the City’s existing rodent management control efforts, and assessing a rodenticide ban on City-owned property in Richmond. A report is forthcoming to address the Vancouver Coastal Health’s notice of intention to terminate the existing Service Agreement, including potential budget impacts associated with this matter.

This report supports Council’s Strategic Plan 2018-2022 Strategy #1 A Safe and Resilient City:

Enhance and protect the safety and well-being of Richmond.

1.2 Future-proof and maintain city infrastructure to keep the community safe.

This report also supports Council’s Strategic Plan 2018-2022 Strategy #2 A Sustainable and Environmentally Conscious City:

Environmentally conscious decision-making that demonstrates leadership in implementing innovative, sustainable practices and supports the City's unique biodiversity and island ecology.

Analysis

There is currently limited information regarding the distribution of rodents in Richmond. Infestations are known to more likely occur in urban areas as opposed to rural areas. Provincial guidelines, established for managing general rodent populations, focus on controlling food and water sources, limiting denning areas and using exclusion techniques as primary management

methods. Provincial guidelines state that anticoagulant rodenticides (anticoagulants) are to be administered when all of the pesticide-free methods have been deemed unsuccessful at managing infestations. Anticoagulants are typically administered in bait, presented to rodents in bait stations. Bait stations are placed in high-volume traffic areas such as building perimeters to allow rodents to enter the station and consume the bait. The anticoagulant is mixed with a palatable substance that attracts rodents and while the bait stations are designed with exclusion chambers for other wildlife, these chambers have not proven to be completely effective.

When used improperly, anticoagulants can enter the food chain and are also known to poison non-target animals such as insects, birds, squirrels and raccoons that ingest the bait, and secondary animals such as coyotes, bobcats and raptors that prey on the contaminated rodents. Anticoagulants cause internal bleeding when ingested, which does not kill the animal instantly. The affected animal has the ability to move about for many days before eventually becoming lethargic and/or erratic, which allows for easier predation. Anticoagulants maintain some of its toxicity within the host animal's body and predators that consume multiple affected prey can, over time, accumulate to lethal levels. A 2009¹ study conducted in BC and the Yukon examined 164 owl livers and found that 70% had residues of at least one anticoagulant, and of these, 41% had more than one anticoagulant detected. Anticoagulants are a hazardous material that must be disposed of at licenced facilities. The improper disposal of anticoagulants can result in the contamination of local soil, surface and groundwater conditions.

Regulatory Context

Health Canada is responsible for registering anticoagulant products for use under the federal *Pest Control Products Act*. Health Canada is also responsible for continuously evaluating product safety. Anticoagulants were last reviewed by Health Canada in 2010 and are scheduled for re-evaluation in 2025. The Province is responsible for regulating the sale, use, storage, transportation and disposal of anticoagulants in BC under the *Integrated Pest Management Act*.

The City's Enhanced Pesticide Management Program was adopted in 2009 to reduce the community's exposure to unnecessary pesticides by restricting use of pesticides for cosmetic purposes, and empowering community members to follow pesticide-free practices with supportive resources. Vancouver Coast Health ("VCH") currently provides rodent control services on city-owned properties and private properties per the requirements of the City's *Public Health Protection Bylaw No. 6989*. The City is responsible for ensuring that attractants such as garbage is properly managed on private property through the *Solid Waste and Recycling Regulation Bylaw No. 6803* and the *Unsanitary Premises Regulation Bylaw No. 7162* to reduce the likelihood of rodent activity. Cosmetic pesticide use is restricted in Richmond through the City's *Pesticide Use Control Bylaw No. 8415*. Part 3 of Bylaw No. 8415 includes an exemption for pests that transmit a human or animal disease. Rodents are defined under the Bylaw No. 6989 as having the potential to transmit a communicable disease.

¹ Albert CA, Wilson LK, Mineau P, Trudeau S, Elliott JE. Anticoagulant rodenticides in three owl species from Western Canada, 1988-2003. *Arch Environ Contam Toxicol*. 2010 Feb;58(2):451-9. doi: 10.1007/s00244-009-9402-z. Epub 2009 Oct 14. PMID: 19826750.

Existing Rodent Control Practices in Richmond

The City currently retains VCH and a private contractor to control rodents on city-owned land and facilities. Current practices from each provider include primary exclusion techniques, mechanical and trapping methods and administering anticoagulants. The City has enjoyed a long-standing contract with VCH for rodent management on city-owned lands, as well as, responding to private inquiries and complaints and bylaw enforcement under the Richmond's *Public Health Protection Bylaw No. 6989*. VCH currently provides regular rodent services at 12 city-owned properties (Attachment 2) and it is estimated that they maintain approximately 250 bait stations. The private contractor provides rodent management services, as needed, at approximately 22 city locations (primarily facilities). This service also includes deploying mechanical traps and administering anticoagulants. It is estimated that the private contractor deploys and maintains approximately 950 bait stations at these sites annually.

The City has a long-standing joint use relationship with the Richmond School District (No. 38), which has resulted in co-operation in co-locating schools, parks, and shared-use facilities (eg. playgrounds). There are currently six jointly-owned parks and an additional 14 City parks that contain shared-use playgrounds. The Richmond School District currently employs a permanent pest control technician, licenced to manage rodents, including administering anticoagulants in bait stations. Approximately 100 bait stations are present in the entire Richmond School District.

Existing VCH Contract

The City was recently notified by VCH that the existing service contract, including rodent control services noted above, will not be extended after March 31, 2021 (Attachment 1). It is anticipated that the City will assume some of these responsibilities, which may require additional resources not considered in this report. Staff are not able to maintain VCH's current level of rodent management service on private property after March 31, 2021 as a provincial licence is required to deploy and maintain rodent control devices. Additional staff time and budget would also be required to maintain this level of service. Staff intend on responding to general inquiries related to rodents and promoting pesticide-free management measures prior to deploying anticoagulants. Staff are working with VCH to better understand the impacts that this service level disruption will have on existing staff resources and are preparing a separate report for Council's consideration.

Current Challenges

There is very limited information regarding the effectiveness of anticoagulants in managing general rodent populations nor the distribution of rodents in Richmond. Local information on the efficacy of anticoagulants is beginning to emerge as many local governments in Metro Vancouver have begun to assess their existing rodent management practices. Staff reviewed the data collected in neighboring municipalities and the records provided by VCH and the private contractor. Staff also retained a private pest control service to evaluate 12 city properties managed by VCH. Overall sites were found to support low-medium mice and rat populations. It is not possible to determine if the low-medium rodent populations noted during the study is attributed to anticoagulants.

The City's existing rodent management program is centered on administering anticoagulants, which is inexpensive and requires little staff oversight. Conversations with pest control specialists suggest that if installed properly, anticoagulants are effective for managing large, localized rodent infestations and can exclude non-target species. Effects from anticoagulants on local wildlife including raptors are widely noted, which suggests that these substances are entering Richmond's animal food chain regularly. Some instances of accidental human poisoning due to the improper maintenance of bait stations on private property was also noted by staff. A departure from using anticoagulants will have cost implications and will require additional staff support time. Monthly service calls will be increased to weekly and/or biweekly, which will diminish resources to respond to other building related matters. Residual cost implications including increased fuel consumption and vehicle maintenance are also expected.

Recommendations

Staff recommend that the City stop using anticoagulant rodenticide on city-owned property for one year to better assess its effectiveness for managing rodents as well as its related impact on local wildlife. If endorsed, only non-pesticide practices such as traditional snap-traps will be employed to manage rodents and staff will monitor city-owned properties during this time of transition. Should large infestations of rodents result from this transition, anticoagulants may be required to manage an outbreak. If an infestation is determined to occur, either by a sharp increase in complaints or rodent sightings, these products will only be deployed as needed and under the supervision of staff for compliance under the provincial regulations. If endorsed, staff will also implement a field monitoring program to assess the outcomes of the transition from anticoagulants and will report the findings to Council within one year.

The City's contract with VCH is slated to end on March 31, 2021. To prepare for a significant increase in rodent inquiries on private property after this date, the City should have supportive resources available for distribution to the public. The City will also be required to develop an integrated rodent management program under provincial legislation. Staff recommend developing an integrated rodent management program, consistent with the City's Enhanced Pesticide Management Program that includes informative material for distribution to local residents and businesses regarding rodent management. If endorsed, material will be designed to highlight key preventative measures that can reduce rodent activity and the benefits of using pesticide free techniques. Staff intend on working closely with the Richmond School District, whom have expressed interest in collaborating.

Provincial regulations currently allow for the retail sale and distribution of anticoagulants, which encourages the private use of these products with minimal training or education. Staff recommend that a letter be sent to the provincial Minister of Environment requesting that the province review its current policies relating to the sale of anticoagulants and consider future provisions that restrict its accessibility in the marketplace.

Financial Impact

The City pays VCH \$40,000 annually for rodent control service on city-owned and private property, which is reflected in annual approved utility budgets and rates. VCH has notified the City that they will not be extending this contract passed March 31, 2021. The City will be charged a prorated

amount of \$10,000 by VCH for the period between January 1, 2021 and March 31, 2021. The remaining \$30,000, approved in the 2021 utility budgets and rates, will be allocated to fund a portion of the cost required to maintain rodent management service on city-owned land following March 31, 2021.

Staff are requesting a net \$67,000 in new funding to implement this rodent management transition program in 2021. If approved, the \$67,000 can be funded from the Sanitation and Recycling Provision and be included in the Consolidated 5 Year Financial Plan (2021-2025). Details on this proposed cost is tabulated below.

Table 1. Proposed Costing for Rodent Transition Program

Private contractor	\$60,000	Pesticide free rodent management services at 34 city-owned sites
Rodent monitoring program	\$15,000	Field monitoring for rodent activities at 34 city-owned sites
Staff time	\$22,000	Additional staff time required to support service calls at city facilities.
2021 budget	(\$30,000)	Rodenticide program related to VCH
	\$67,000	

Conclusion

The City currently retains Vancouver Coastal Health and a private contractor to manage rodents at 34 city-owned sites, which includes deploying anticoagulants. Results of the evaluation indicate that products containing anticoagulants are entering the City’s food chain and affecting local wildlife. Some questions also remain on the level of effectiveness that anticoagulants have on controlling general rodent populations.

Staff is recommending that the City stop using anticoagulants for one-year, while additional information and monitoring take place. If endorsed, \$67,000 in funding will be used to transition to pesticide-free practices and monitor the results for one year. Staff will also develop an integrated pest management approach consistent with the City’s’ Enhanced Pesticide Management Program, request that the provincial Ministry of Environment review existing policies related to the retail sale of anticoagulants and report back to Council in one year.



Chad Paulin M.Sc., P.Ag.
 Manager, Environment
 (604-247-4672)

- Att. 1: City Memorandum: Vancouver Coastal Health - Termination of Service Agreement
- Att. 2: Rodent Management Assessment: Site Locations



City of Richmond

Memorandum Engineering and Public Works Fleet and Environmental Programs

To: Mayor and Councillors
From: Carli Williams, P.Eng.
 Manager, Business Licence and Bylaws
 Chad Paulin, P.Ag.
 Manager, Environment
 Suzanne Bycraft
 Manager, Fleet and Environmental Programs
Date: November 30, 2020
File: 10-6125-01/2020-Vol 01
Re: Vancouver Coastal Health - Termination of Service Agreement

The City has had a long-standing and unique agreement with Vancouver Coastal Health authority (VCH) to undertake bylaw enforcement services on our behalf. Recently, due to resource demands placed on them by the current pandemic situation, VCH served notice of their intention to terminate effective March 30, 2021 (Attachment 1). The Service Agreement is dated January 1, 2010 between VCH and the City, with termination provisions of the agreement providing for six months written notice by either party.

Key services provided by VCH to the City under this agreement principally relate to enforcement of various aspects of City bylaws and include:

- Mosquito control (respond to public complaints, provide education advice, undertake mosquito control on City property – Sturgeon Banks, City ditches, and other City properties);
- Rodent control (activities similar to that of mosquito control, including exterior rodent elimination at single-family residential dwellings);
- Smoking control provisions of City bylaws;
- Noise control; and
- Bylaw enforcement regarding general health issues.

The current value of the contract is \$247,700 annually, with annual inflationary increments.

VCH has advised that the current pandemic situation requires their health inspection resources to be allocated exclusively to address pandemic-related matters now and into the foreseeable future. As such, they will no longer be able to deliver the services under the agreement.

November 30, 2020

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As noted, the service agreement model between the City and VCH is unique. A scan of models in other jurisdictions confirms that no other city has this type of arrangement. Early findings indicate these services are managed by cities, including contracted resources, and to varying service levels.

Staff are in the process of analyzing the implications and options available and will report to Council with recommendations.



Carli Williams, P.Eng.
Manager, Business Licence and Bylaws



Chad Paulin, P.Ag.
Manager, Environment



Suzanne Bycraft
Manager, Fleet and Environmental Programs

SJB:sb

Att. 1

pc: SMT

Dave Richards, Acting Director, Public Works Operations
Peter Russell, Director, Sustainability and District Energy

November 30, 2020

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VCH – Richmond Environmental Health

325-8100 Granville Avenue

Richmond, BC V6Y 3T6

Tel: 604 233 3147 Fax: 604 233 3175

September 29, 2020

DELIVERED BY COURIER

City of Richmond
Environmental Programs
5599 Lynas Lane
Richmond, BC V7C 5B2

Attention: Suzanne Bycraft, Manager of Fleet & Environmental Programs

Dear Ms. Bycraft,

Re: Termination of Service Agreement

Pursuant to our teleconference on September 22, 2020, Vancouver Coastal Health Authority ("VCH") is providing the City of Richmond with notice to terminate the Service Agreement between VCH and the City of Richmond, dated January 1, 2010 (the "Agreement"). Pursuant to section 12.1 of the Agreement, the termination shall be effective March 30, 2021 (the "End Date").

Any outstanding payments will be calculated in accordance with section 12.1 of the Agreement. VCH will arrange for further discussion regarding outstanding payments prior to the Effective Date.

Yours truly,

Vancouver Coastal Health Authority

Per:

A handwritten signature in black ink that reads "C. Kurzac".

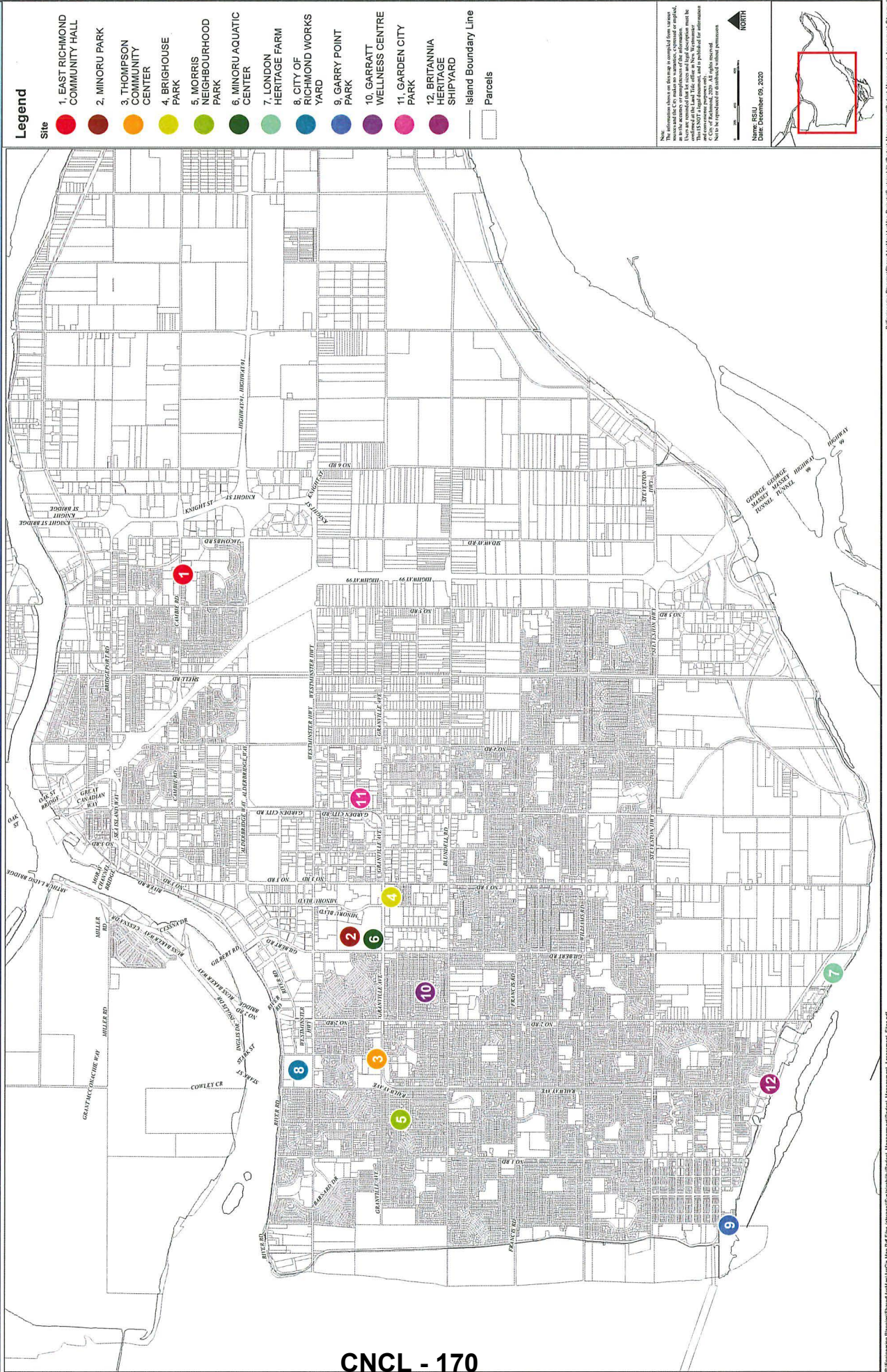
Claudia Kurzac

Manager, Environmental Health
Vancouver Coastal Health

office 604 233 3172

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Rodent Management Assessment: Site Locations



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