



**To:** Public Works and Transportation Committee      **Date:** April 16, 2009  
**From:** Dave Semple      **File:**  
Director of Parks & Public Works Operations  
**Re:** Pesticide Use Management in Richmond

**Staff Recommendation**

That the staff report dated April 16, 2009 from the Director of Parks and Public Works Operations entitled "Pesticide Use Management in Richmond", be received for information.

Dave Semple  
Director of Parks and Public Works Operations  
(604-233-3350)

Att. 4

FOR ORIGINATING DEPARTMENT USE ONLY					
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER			
Budgets .....	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>				
Law .....	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>				
Community Bylaws .....	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>				
Parks Maintenance & Operations.....	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>				
<b>REVIEWED BY TAG</b>	YES <input checked="" type="checkbox"/> <i>JK</i>	NO <input type="checkbox"/>	<b>REVIEWED BY CAO</b>	YES <input checked="" type="checkbox"/> <i>CA</i>	NO <input type="checkbox"/>

## Staff Report

### Origin

At their September 8<sup>th</sup> 2008, meeting, Council requested that staff investigate the banning and/or restriction of the use and sale of pesticides for cosmetic uses in Richmond.

This report responds to Council's request. It further provides an overview of the City's current approach with regard to pesticide use and outlines a strategic policy-based program to reduce pesticide risk throughout the community.

### Background

#### *About Pesticides*

There has been increasing public concern in communities across Canada over the use of pesticides and their potential impacts on human health and the environment. Pesticides are a chemically and toxicologically diverse group of substances and their potential effects on human health and the environment vary widely, depending on the substance. Some substances are considered to be preferable to others as they result in less harmful effects.

The term pesticide refers to all herbicides, insecticides, rodenticides, fungicides or other material that kills plants or animals deemed to be undesirable to humans. Cosmetic pesticides are pesticides that are used only for aesthetic purposes and do not include pesticides used to produce food or protect human health.

In Richmond, pesticides are applied throughout the community for a wide range of purposes including protection of human health, agricultural crop protection, industrial applications such as railway clearing, and for horticultural purposes.

#### *Pesticide Management*

In Canada, pesticides are regulated through the Federal and Provincial governments. The federal government determines whether a pesticide can be used in Canada. The provincial government regulates the use of pesticides (i.e., regulating the sale, transportation, storage, preparation, application and disposal of pesticides).

In 2008, two UBCM resolutions regarding cosmetic pesticides were endorsed. The first recommends a ban on pesticides used for cosmetic purposes at the Provincial level, while the second advocates for municipal powers to regulate pesticide use for cosmetic purposes on all private lands. These resolutions are currently under review by the Province.

#### *Municipal Cosmetic Pesticide Bylaws*

Community concerns with pesticide use have resulted in several municipalities enacting bylaws which restrict pesticide use for cosmetic purposes (i.e. the application of pesticides for aesthetic reasons). These bylaws:

- restrict the use of pesticides – local governments do not have jurisdiction to ban or restrict the sale of pesticides

- apply to “cosmetic” applications only – local governments do not have jurisdiction to regulate other types of pesticide use in their communities (e.g., agricultural use, golf course use, health and safety use, etc.)

In BC, the *Community Charter* specifically outlines the authority of municipalities, providing the authority to regulate pesticides used for cosmetic purposes on residential and City-owned land only. It also provides that certain pesticides listed in the provincial *Integrated Pest Management Act* must be allowed and cannot be restricted by municipalities.

Based on the above, the City could introduce a Cosmetic Pesticide Use Bylaw which restricts the application of cosmetic pesticides (excluding those which must be allowed under the Integrated Pest Management Act) on residential and City-owned lands.

In BC, approximately 18 municipalities have enacted bylaws restricting pesticides use for cosmetic purposes, with another ~20 currently considering regulations. In Metro Vancouver, approximately 6 of the 22 municipalities have enacted bylaws, and at least another 2 are currently preparing bylaws.

#### *City of Richmond Activities*

Corporately, the City of Richmond has been working to reduce risks from its pesticide use since the early 1990s. The City Parks department follows principles and practices of integrated pest management (IPM). The IPM approach places emphasis on preventing pest outbreaks through good site design and use of strong horticultural care. When outbreaks do occur, priority is given to non-chemical responses such as manual weeding and biological controls. Chemicals are only used as a last resort and effort is directed at using the most targeted and least harmful substance.

In addition to supporting its horticultural activities, the City also uses pesticides periodically for public health purposes. This year, it has been recommended by the local health authority that the City discontinue its expanded pre-emptive pesticide program for addressing concerns relating to West Nile Virus. This is due to the fact that the virus has not yet reached BC. The City continues to use pesticides as part of mosquito and rodent control programs.

In 2006, the City of Richmond adopted a Pesticide Risk Reduction Policy 7706 (PRRP) to ensure a well-managed and broad scale approach to pesticide use in the community (Attachment 1). The PRRP is not limited to pesticide use for cosmetic purposes but is aimed at reducing risks from all types of application. The policy directs local government resources to priority areas (i.e., uses that pose the greatest risks) and places responsibility on all sectors of society (i.e., federal and provincial governments, private sector and consumers). The PRRP is to be reviewed on a regular basis, and does not preclude the addition of a restrictive bylaw.

Since the PRRP was adopted, the City has made the following progress:

- Supported the development of a landscaping industry accreditation program. Prior to the development of this program, industry accreditation for IPM was not available.
- Continued to reduce use of pesticides on City property<sup>1</sup> and achieved third party accreditation for IPM.

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<sup>1</sup> Of the 10 “traditional” cosmetic pesticides commonly used in the early 1990’s, only one was used in 2008 (Roundup).

- Expanded its education program, including:
  - developing and maintaining a web page with information related to natural yard and garden care
  - providing more workshops to residents on pesticide free lawn and garden care<sup>2</sup>.

In addition to the PRRP, the City's Public Health Protection Bylaw 6989 stipulates notification requirements for pesticide applications to public areas and grounds of multi-family dwellings. The City also accepts unused pesticides at its Recycling Depot under an approved product stewardship program on behalf of the program stewards.

### *Community Views*

The City consulted with a variety of stakeholders prior to adopting the Pesticide Risk Reduction Policy 7706 in 2006 (Attachment 2). At that time, the majority of stakeholders supported the comprehensive approach that was proposed, and were in favour of a reduction in City usage of pesticides and increased education for the community. The Canadian Federation of University Women supported the bylaw approach, while the Airport Authority and the Richmond Garden Club indicated that a bylaw might need to be considered in the future if the policy based approach did not achieve desired results.

In the last year, the City has received correspondence identifying community concerns around pesticide use and requesting that the City of Richmond enact a cosmetic pesticide bylaw. The Canadian Cancer Society (CCS) has been actively promoting the bylaw approach, and was instrumental in the development of a local community group, the "Richmond Pesticide Awareness Coalition" that supports the development of a bylaw. In addition, the CCS is currently lobbying the Province to enact a Provincial Pesticide Ban.

Staff met in 2009 with the Advisory Committee on the Environment (ACE) and the Agricultural Advisory Committee (AAC) to determine whether their views regarding pesticides had changed significantly since the PRRP was developed. ACE continued to support reduced corporate use of pesticides for cosmetic purposes in favour of more natural methods of land care, and working with key stakeholders to identify alternative practices. The AAG continued to support the concept of IPM, both for agricultural operations and City activities.

## **Analysis**

### *Effectiveness of Cosmetic Pesticide Bylaws*

Richmond Health indicates that there is currently no scientific consensus that the cosmetic use of pesticides (when used as directed) leads to adverse health effects (Attachment 3). Without having access to pesticide sales data it is also difficult to assess the effectiveness of bylaws at reducing the cosmetic use of pesticides in those communities where bylaws have been introduced.

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<sup>2</sup> In 2008, 14 workshops were attended by 214 participants.

Limitations of cosmetic pesticide bylaws include:

- they only address only a small subset (i.e. less than 5%)<sup>3</sup> of all pesticides used in Canada
- they currently only address cosmetic uses on residential and public property
- they do not address the leading sources of pesticide exposure for children where evidence is increasingly pointing towards indoor use and diet (Attachment 3)
- they provide inconsistent and differing requirements for businesses, such as landscapers, that conduct work across multiple municipalities
- they are difficult to enforce<sup>4</sup>
- they divert resources away from other social and environmental needs where local government action may be more effective.

Advantages of cosmetic pesticide bylaws include:

- sends a collective signal to the Provincial and Federal government of local community concern
- provides a regulatory instrument which promotes voluntary compliance
- enhances public awareness for less harmful cosmetic pesticide approaches, particularly when coupled with a strong education program

*Local Government Considerations for Taking Action*

Various tools and opportunities exist for local governments to consider when assessing what action, if any, to take to reduce the risk of pesticides in their communities. In addition to strong corporate practices and regulatory bylaws which restrict application of pesticides for cosmetic purposes, other tools include education; alternative regulatory instruments (e.g. notification bylaws); lobbying efforts to provincial and federal governments to better regulate pesticides at the point of sale; and preventative initiatives such as landscape design guidelines for reducing pest incidence. A corporate policy can provide direction for the use of any of these tools.

In selecting action, local governments should consider:

- priority of need in comparison with other health and community priorities
- effectiveness of each tool (regulatory and non-regulatory) individually and in combination
- appropriate roles and responsibilities of the various levels of government

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<sup>3</sup> In 1997, domestic sales of pesticides including those used for cosmetic purposes accounted for ~5% of pesticide sales in Canada. More recent data is not available.

<sup>4</sup> Many municipalities enforce restrictive pesticide bylaws on a complaint basis, and often only respond with education rather than ticketing due to the inherent challenge in proving application.

### *Recommended Approach*

#### Option 1: Enhanced management and policy-based program to further promote the Pesticide Risk Reduction Policy (7706)

Staff propose that the City of Richmond adopt an enhanced management and strategic policy-based program to further promote the Pesticide Risk Reduction Policy (7706). This option provides an increased level of service delivery, promotes the existing Pesticide Risk Reduction Policy (7706) and incurs an additional annual cost of \$110,000 which includes 1.6 FTEs.

Highlights of the enhance management and policy-based program include:

- lobbying senior levels of government to strengthen pesticide laws
- an accelerated yet cost-effective corporate improvement program that achieves no use of non-exempted pesticides within the next three years (i.e., same level of corporate performance achieved under a restrictive bylaw)
- development of preventative measures (e.g., low pesticide-risk landscape design guidelines, continued and strengthened partnership with industry)
- encouraging Metro Vancouver to have a strong regional role in community education and empowerment
- an expanded local education and community partnership program to encompass a wide range of user groups and partnerships including retailers, working with the nursery and landscape industry on accreditation, and the agricultural community.

This approach is considered to provide a strong foundation for change by having both regulatory elements to discourage undesirable behaviour and empowerment-based initiatives to enable transition to desired alternative practices. It is staff's assessment that regulation restricting use of pesticides for cosmetic purposes should be enacted at the Provincial level where responsibility and jurisdiction exist to restrict product sale.

See Attachment 4 for a tabular format of the Recommended Strategy in comparison to other options.

### *Alternative Options*

#### Option 2: Pesticide Risk Reduction Policy and Existing Management Program (Status Quo)

Under Option 2, the City would continue with the existing program that supports the Pesticide Risk Reduction Policy (7706). There is no additional cost associated with Option 2.

While this program represents a progressive and broader scale approach, Option 2 is not recommended as a higher level of service is required to address the current level of public concern relating to the issue.

#### Option 3: Restrictive Cosmetic Pesticide Bylaw (Rescind Pesticide Risk Reduction Policy)

Under Option 3, the existing PRRP (7706) would be rescinded, and replaced with a bylaw that restricts the cosmetic use of pesticides on residential and City-owned land. Education would be required to inform the Richmond community about the bylaw and to provide information about alternatives to using the restricted pesticides. Costs associated with Option 3 are estimated at

\$170,000 additional annual operating costs, with 2.2 FTE's, plus an additional one-time cost of approximately \$15,000 for bylaw stakeholder consultation.

Option 3 is not recommended due to its narrow focus on the application of pesticides for cosmetic purposes on City and residential lands, the difficulty in enforcing cosmetic pesticide bylaws, cosmetic pesticide use regulation is a Provincial responsibility and would be more effectively addressed at that level, and the lack of focussed attention on pesticides that present a higher health risk.

Option 4: Enhanced management program to further promote the Pesticide Risk Reduction Policy (7706) and Restrictive Cosmetic Use of Pesticides Bylaw

Option 4 is comprehensive and includes the Bylaw (i.e. Option 3) and many of the components of the Enhanced Management and Policy-based Program (Option 1). An enhanced management and policy-based program would accelerate progress under the Pesticide Risk Reduction Policy (7706) while the Restrictive Cosmetic Pesticide Bylaw would target cosmetic use on residential and City-owned land. Additional annual operating costs for Option 4 are \$210,000 with 2.7 FTE's, plus \$15,000 for bylaw stakeholder consultation costs.

Option 4 is not recommended due to resource requirements and bylaw limitations (as described for Option 3 above).

A more detailed comparison of the recommended approach (Option 1) and Options 2 through 4, including program cost information, is provided in Attachment 4.

### **Financial Impact**

None at this time. The recommended option will be submitted through the budget process for Council's consideration in 2010.

### **Financial Analysis**

The total additional annual cost to implement the proposed approach outlined in Option 1 - enhanced management program - is \$110,000 which includes 1.6 FTE. This includes costs for resources and improvements to the Parks Department integrated pesticide management program; additional resources to coordinate education, community partnerships and lobbying activities; and the materials and contracts required to deliver these programs.

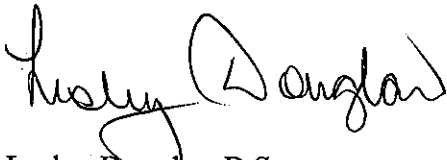
The above costs will be included as an additional expenditure request in the 2010 budget process for Council's consideration.

Costs for the remaining options outlined in the staff report are as follows:

- Option 2 – Retain Existing Policy and Management Program: no additional cost
- Option 3 – Introduce Cosmetic Bylaw (Rescind Policy): \$170,000 annual operating, plus \$15,000 for bylaw stakeholder consultation.
- Option 4 – Policy, Enhanced Management Program and Cosmetic Bylaw: \$210,000 annual operating, plus \$15,000 for bylaw stakeholder consultation.

## Conclusion

The public continues to be concerned about the potential risks of pesticides to public health and the environment. In Richmond, the cosmetic use of pesticides has received much more attention than other types of pesticide use despite a lack of scientific consensus that this type of use leads to adverse health effects. The current focus on cosmetic use should not be a reason to implement an approach that fails to address the other potentially larger risks from pesticide use. A more fully resourced Pesticide Risk Reduction Program, including the lobbying at Provincial and Federal levels where accountability and jurisdiction reside, is a responsible allocation of resources to address the overall risks from all types of pesticide use in Richmond.



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(604-247-4672)

LD:ld





# City of Richmond

# Policy Manual

Page 1 of 1	Adopted by Council:	Amended:	<b>POLICY:</b>
File Ref:	<b>PESTICIDE USE</b>		

**POLICY:**


It is Council policy that:

in recognition that long-term impacts of pesticide use on human health and the environment are largely unknown, the City of Richmond supports and encourages pesticide risk reduction in the City by:

1. Reviewing corporate practices pertaining to pesticide use and management on an annual basis to seek opportunities to continually minimize risks posed by corporate pesticide use and reduce corporate dependence on pesticides.
2. Reporting corporate pesticide use in the City's State of Environment reporting program.
3. Working collaboratively with the Richmond community to facilitate pesticide risk reduction throughout the City to the greatest extent possible with an emphasis on building awareness and understanding and facilitating the use of alternative low risk effective practices.
4. Working with other levels of government to collaborate with industry and encourage stronger collective pesticide management, including but not limited to strengthened pesticide approval systems, improved monitoring and effects assessment, and coordinated education programs.
5. Reviewing this policy on an bi-annual basis or as new knowledge is gained to ensure it remains current and effective.

January 27, 2006

-8-

 <h2 style="display: inline-block; margin-right: 100px;">City of Richmond</h2> <h2 style="display: inline-block;">Policy Manual</h2>		
Page 1 of 2	Date Implemented:	<b>ADMINISTRATIVE PROCEDURE:</b>
File Ref:	<b>PESTICIDE USE POLICY IMPLEMENTATION</b>	
<p>The Pesticide Use policy is based on the following sustainability principles:</p> <ol style="list-style-type: none"> <li>1. Precautionary Principle                     <ul style="list-style-type: none"> <li>• given that high uncertainty exists in whether pesticide use is safe, precautionary action should be taken to minimize risks</li> <li>• an emphasis on risks recognizes that not all pesticides are the same and enables focus to be directed towards strategic action that results in the greatest benefit</li> </ul> </li> <li>2. User Responsibility                     <ul style="list-style-type: none"> <li>• pesticide risk reduction should be pursued in an inclusive approach, promoting collective action to ensure that all responsible parties are contributing fairly to the solution</li> <li>• as a user of pesticides, the City should review its corporate practices to seek continual improvement and demonstrate accountability by reporting its use to the community</li> </ul> </li> <li>3. Decision-Making that Respects all Interests, Today and Tomorrow                     <ul style="list-style-type: none"> <li>• pesticide risk reduction should be pursued in a manner that fosters shared stewardship and that respects the complete suite of social, environmental and economic objectives of the Richmond community, including but not limited to human health protection, environmental preservation, agricultural viability, sustainable economic development and financial sustainability.</li> <li>• pesticide risk reduction should be pursued in a manner that considers the interests of all members of the community today and in the future.</li> </ul> </li> <li>4. Effective Governance                     <ul style="list-style-type: none"> <li>• pesticide risk reduction should be pursued in a manner that fosters a coordinated approach and ensures that all involved parties (various levels of government, industry and other users) are meeting their respective responsibilities.</li> </ul> </li> <li>5. Community Empowerment                     <ul style="list-style-type: none"> <li>• pesticide risk reduction should be pursued in a manner that builds long-term community capacity and makes it easier to adopt and follow sustainable practices.</li> </ul> </li> </ol>		

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January 27, 2006

-9-



**City of Richmond**

**Policy Manual**

Page 2 of 2	Date Implemented:	<b>ADMINISTRATIVE PROCEDURE:</b>
File Ref:	<b>PESTICIDE USE POLICY IMPLEMENTATION</b>	

The Pesticide Use policy will be implemented interdepartmentally in the following manner:

<b>Major Action</b>	<b>Lead Coordinating Department</b>
<p>1. Corporate Use Review</p> <ul style="list-style-type: none"> <li>• establish and manage electronic data system for recording and reporting corporate use</li> <li>• identify opportunities for risk reduction in corporate park activities</li> <li>• report options to Council</li> </ul>	Parks
<p>2. State of Environment Reporting</p> <ul style="list-style-type: none"> <li>• incorporate corporate pesticide use trend information</li> </ul>	Policy and Planning
<p>3. Working with the Community</p> <ul style="list-style-type: none"> <li>• enhance education on alternative practices in partnership with the Richmond community and other agencies in a manner which builds upon already existing initiatives</li> <li>• initiate discussions with key stakeholder groups, including agricultural community, Advisory Committee on the Environment, golf course operators, and other key community stakeholders to better understand concerns and identify local opportunities for reducing risks posed by pesticides and report options to Council</li> </ul>	<p>Environmental Programs/Parks</p> <p>Environmental Programs/Policy and Planning</p>
<p>4. Strengthening Collective Governance</p> <ul style="list-style-type: none"> <li>• evaluate strategies for the City to influence and improve senior government management of pesticides including but not limited to:                             <ul style="list-style-type: none"> <li>• improved pesticide registration</li> <li>• improved incentives for non-pesticide use (e.g., tax incentives to encourage organic farming)</li> <li>• strengthened communications with communities to improve awareness and understanding of how risks are being managed</li> <li>• improved monitoring and effects assessment</li> </ul> </li> <li>• coordinate with other municipalities and the Greater Vancouver Regional District to identify opportunities for ensuring that the shared regional environment is being adequately protected</li> </ul>	<p>Environmental Programs</p> <p>Environmental Programs/Parks</p>
<p>5. Policy Review</p>	Environmental Programs

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**Results of Community Consultation**

Stakeholder	Response to Proposed Policy	Key Comments
<b>Users</b>		
Agriculture Advisory Committee	Support	<ul style="list-style-type: none"> <li>• are not supportive of additional regulations for pesticide usage for agricultural purposes</li> <li>• public education is very important both with respect to increasing awareness of current best practices and alternatives, and for improving understanding of current practices being adhered to by the agricultural community</li> <li>• provision of wider choice of products could be a means for reducing risk</li> </ul>
Richmond Golf Courses – Superintendents Association	Support	<ul style="list-style-type: none"> <li>• support public education with respect to both golf course use and low-risk alternatives</li> <li>• provision of wider choice of products</li> <li>• risk-based policy approach will take time and sustained corporate focus</li> <li>• balancing different stakeholders may be challenging</li> <li>• would be interested in contributing expertise and being involved in initiative</li> </ul>
Vancouver International Airport Authority	Support	<ul style="list-style-type: none"> <li>• support the corporate reporting and education and awareness components and indicate that YVR will consider reporting its use</li> <li>• indicated that a bylaw may need to be considered if the approach is inadequate</li> <li>• indicated need for social change in terms of public expectations of green space and larger issues of sustainable practices</li> </ul>
BC Landscape and Nursery Association	Support	<ul style="list-style-type: none"> <li>• indicate that a large part of the issue is people not understanding products or proper application – support focus on education and awareness</li> <li>• interested in creating partnership with the City to aid in approach delivery and monitoring of effectiveness</li> </ul>
Richmond Garden Club	Support	<ul style="list-style-type: none"> <li>• most avid gardeners are aware of appropriate use of pesticides</li> <li>• areas of potential concern and suggestions:                             <ul style="list-style-type: none"> <li>○ addressing how difficult it is to understand pesticide use and risk</li> <li>○ multi-cultural approach to education</li> <li>○ transparency in pesticide use in parks, agriculture and the City</li> <li>○ providing the community with an opportunity to dispose of old pesticides</li> <li>○ promoting regulation of landscaping companies</li> <li>○ consider a bylaw if approach does not achieve desired result</li> </ul> </li> </ul>
<b>Government Agencies</b>		
Federal Pesticide Management Regulatory Agency Ministry of Environment Ministry of Agriculture	Support	<ul style="list-style-type: none"> <li>• regulatory changes are occurring at senior government level which will provide opportunities to link with the proposed policy-based approach (e.g., new regulations will simplify monitoring sales) – there are also various initiatives which could help support such as the Environmental Farm Plan program</li> <li>• providing options is important</li> <li>• City taking a leadership role is important</li> </ul>
GVRD	Support	<ul style="list-style-type: none"> <li>• messaging that is linked to health is a strong impetus for behaviour change</li> <li>• there is a distinct need for data that provides credibility or endorsement for alternatives to chemical products</li> <li>• outreach should include consideration of lifecycle of products, consideration of alternatives, product selection, education on use, storage and disposal</li> </ul>
Vancouver Coastal Health	Support	<ul style="list-style-type: none"> <li>• refer to attached letter</li> </ul>
<b>Community Interest Groups</b>		
Advisory Committee on the Environment	Support	<ul style="list-style-type: none"> <li>• public awareness and education is the strongest component of the proposed policy</li> <li>• suggest that quantification of use, review of City’s use, public and risk/benefit analysis also be components of the approach</li> </ul>
Canadian Federation of University Women	Mixed	<ul style="list-style-type: none"> <li>• supported elements of the policy but consider that a bylaw restricted cosmetic pesticides should be implemented</li> </ul>



Richmond Health Protection

Richmond Health Services  
8100 Granville Avenue  
Richmond, BC V6Y 3T6  
Tel: (604) 233-3147 Fax: (604) 233-3175

February 19, 2009

Lesley Douglas  
Assistant Manager, Environmental Programs  
City of Richmond  
6911 No. 3 Road  
Richmond, B.C. V6Y 2C1

Dear Ms. Douglas:

Re: Pesticide Use Management in Richmond

We have reviewed the current state of evidence regarding the use of pesticides for "cosmetic" purposes.

There is no compelling public health reason for a by-law banning the "cosmetic" use of pesticides. When compared to proven health based by-laws that restrict smoking in public places, the public health benefit from a by-law banning cosmetic pesticides is minimal:

- There is no agreement among scientists that the "cosmetic" use of pesticides as directed leads to adverse health effects
- There is only very limited evidence that by-laws banning the "cosmetic" use of pesticides is effective in reducing use
- The evidence increasingly points to indoor use and diet as by far the leading sources of pesticide exposure for children

Nevertheless, there may be environmental and other considerations for taking such action.

However, enforcement of a by-law ban is problematic when homeowners can still purchase the products legally. Most of the municipalities with such by-laws do not actively enforce them. In fact, after enacting the by-law, some communities stopped funding public education and promotion of pesticide alternatives.

Whether or not pesticides are used for yard maintenance, efforts of homeowners to keep appealing and well maintained landscaping should be recognized. The aesthetics of urban landscape has public health value. Appealing and well-kept neighborhoods increase the public's sense of safety and increase outdoor activities in neighborhoods. Lack of physical activity and poor dietary habits together cause about one third of the cancers among Canadians.

A comprehensive Integrated Pest Management (IPM) approach offers a better alternative to cosmetic pesticide ban by-laws. IPM strikes a balance between prudence, public policy, and private choice. A credible IPM approach, however, must consider the complete life cycle of the urban landscape - planning, construction, maintenance and renewal.

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- 2 -

Data from City staff show that use of regulated pesticides by the City itself has declined since 2005. The City has stopped using weed and feed products. The City has also sponsored a number of public education activities on IPM each year. The City, under the Public Health Protection By-laws, already has public notification requirements for certain pesticide applications. It is our view that the City can enhance its IPM strategy by continuing to build on its successes:

- 1. Strengthen City Policy on IPM**
  - a. A more comprehensive definition of IPM, including the expectation that pesticides are to be used as the last resort
  - b. Include IPM in the City's Sustainability Framework
  - c. Improve public access to information regarding the City's pesticide use
  - d. Annual public reporting on the City's progress in adopting IPM
- 2. Educate the Public and Businesses to Change "Cultural Norm"**
  - a. Encourage the design and construction of sustainable landscapes that use native plants and other pest-resistant plants
  - b. Target IPM public education to "high users" and other selected groups
  - c. Disseminate IPM information at points of contacts with the public – for example when applying for building permits, or paying property taxes
  - d. Increase public awareness on how and where to dispose of unwanted pesticides
  - e. Work with lawn care product retail outlets and landscaping companies to give more prominence to low risk and reduced risk products, and enhance customer education at the point of sale and service
  - f. Work with educational institutions to offer IPM certification for private home owners
- 3. Strengthen Existing and Consider New By-laws**
  - a. Increase public awareness of existing pesticide application notification requirements for multiple unit housing complexes, under the current Public Health Protection By-law
  - b. Consider amendments to the Public Health Protection By-law to require notification of pesticide use for single dwelling residential properties and to eliminate the spot treatment notification exemption granted to multiple unit housing complexes
  - c. Consider a new by-law that requires IPM certification for architects, landscape planner, landscapers, yard maintenance workers, and others who provide landscape related services for hire in the municipality
- 4. Work with Other Levels of Governments**
  - a. To ban the sale of weed and feed products
  - b. To create coherent province wide regulations and strategies for non-agricultural pesticide sale and use
  - c. To promote comprehensive IPM
- 5. Evaluation**
  - a. Have well designed evaluation and monitoring processes in place.

Richmond Public Health is committed to continue to work with City staff in implementing a municipal-wide Integrated Pest Management strategy.

- 3 -

Yours truly,



James D Lu, MD, MHSc  
Medical Health Officer, Richmond  
Vancouver Coastal Health

JLU:jc

c.c. Steve Chong, Program Manager, Health Protection, Richmond HSDA  
Nick Losito, Regional Director, Health Protection, Vancouver Coastal Health  
Dr. Patricia Daly, Chief Medical Health Officer, Vancouver Coastal Health

## Attachment 4 – Comparison of Recommended Approach with Alternative Options

	Option 1 – Recommended Strategy: Enhanced Management and Policy-Based Program	Option 2: Policy and Existing Management Program	Option 3: Restrictive Cosmetic Pesticide Bylaw (re-scind Policy)	Option 4: Policy, Enhanced Management Program and Restrictive Bylaw
<b>Aim</b>	Targets all types of pesticide use (commercial, agricultural, residential) based on level of risk and benefit	Targets all types of pesticide use (commercial, agricultural, residential) based on level of risk and benefit	Targets pesticide use for cosmetic purposes on residential and/or City-owned land	Targets all types of pesticide use (commercial, agricultural, residential) based on level of risk and benefit
Corporate Reduction	<ul style="list-style-type: none"> <li>Accelerated IPM program<sup>5</sup> that maintains current aesthetic levels</li> </ul>	<ul style="list-style-type: none"> <li>IPM continual improvement base program</li> </ul>	<ul style="list-style-type: none"> <li>Cease use of non-exempted pesticides immediately</li> </ul>	<ul style="list-style-type: none"> <li>Cease use of non-exempted pesticides immediately</li> </ul>
Education & Community Partnerships	<ul style="list-style-type: none"> <li>Expanded local education program to encompass more user groups and partnerships (e.g., working with retail)</li> <li>Work with industry on accreditation</li> <li>Explore problem prevention measures (e.g. landscaping guidelines)</li> <li>Encourage Metro Vancouver to take strong regional role in community education</li> <li>Liaising/consulting with community</li> </ul>	<ul style="list-style-type: none"> <li>Base education program (e.g. website and residential pesticide use workshops)</li> <li>Work with industry on accreditation</li> </ul>	<ul style="list-style-type: none"> <li>Education program changed to inform and advise on restrictive bylaw and alternative practices for residential property care</li> <li>Significant consultation for draft bylaw recommended</li> </ul>	<ul style="list-style-type: none"> <li>Expanded education program that includes initiatives to inform on the restrictive bylaw</li> <li>Work with industry on accreditation</li> <li>Explore problem prevention measures (e.g. landscaping guidelines)</li> <li>Encourage Metro Vancouver to take strong regional role in community education</li> <li>Significant consultation for draft bylaw recommended</li> <li>Ongoing liaising/consulting with community</li> </ul>
Service Delivery Levels	<ul style="list-style-type: none"> <li>Actively support the Province in enacting a targeted Province-wide restrictive regulation for pesticide use for cosmetic purposes (e.g., ban Weed and Feed products)</li> <li>Actively lobby provincial government to better regulate all type of uses</li> <li>Consideration given to lobbying federal government to better regulate product approvals</li> <li>Explore partnership opportunities (e.g. joint distribution of info on regulations, practices)</li> </ul>	<ul style="list-style-type: none"> <li>Identified lobbying senior governments as a strategic focus but no meaningful progress achieved due to resource limitations</li> </ul>	<ul style="list-style-type: none"> <li>Not a focus area</li> </ul>	<ul style="list-style-type: none"> <li>Actively lobby provincial government to better regulate sales (e.g. ban “Weed and Feed”)</li> <li>Consideration given to lobbying federal government to better regulate product approvals</li> <li>Explore partnership opportunities (e.g. joint distribution of information on regulations, alternative practices)</li> </ul>
Municipal Regulation	<ul style="list-style-type: none"> <li>Continue to enforce pesticide notification bylaw</li> </ul>	<ul style="list-style-type: none"> <li>Continue to enforce pesticide notification bylaw</li> </ul>	<ul style="list-style-type: none"> <li>Enforce a Bylaw that restricts the cosmetic use of pesticides on residential and City owned property<sup>6</sup></li> </ul>	<ul style="list-style-type: none"> <li>Enforce a Bylaw that restricts the cosmetic use of pesticides on residential and City owned property<sup>6</sup></li> </ul>
<b>Cost/Resource Implications</b>	\$110,000 annual operating cost; 1.6 FTE (1 FTE education/advocacy; .6 FTE Parks labour)	No added cost or resources	\$170,000 annual operating impact plus \$15,000 for bylaw consultation; 2.2 FTE (1.2 FTE Parks labour; 1 FTE Bylaw enforcement/education)	\$210,000 annual operating impact plus \$15,000 for bylaw consultation; 2.7 FTE (1.2 FTE Parks labour; 1 FTE education/advocacy; .5 FTE bylaw enforcement)

<sup>5</sup> e.g., no use of non-exempted pesticides within 3 years, development of strengthened IPM management system (policy, monitoring, reporting), dedicated IPM improvement budget

<sup>6</sup> Exemptions can be specified, and could include lawn bowling greens, the pitch and putt course, or other scenarios in which eliminating pesticide use may lead to substantial loss or damage of amenities.