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Manitoba Conservation and Water Stewardship
Environmental Programs and Strategies Branch
1007 Century Street
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The Manitoba Eco-Network Water Caucus is pleased to provide input into the launched consultation process on the use of cosmetic pesticides in Manitoba. We recommend that the province of Manitoba establishes a full ban on the sale and use of pesticides for cosmetic purposes.

Water is the most basic building block of life. Clean water is essential for human health, wildlife, and a balanced environment. Yet, water is being polluted at unprecedented rates, with chemicals, nutrients, metals, pesticides, and other contaminants. The U.S. Environmental Protection Agency (EPA) states that, "By their very nature, most pesticides create some risk of harm to humans, animals, or the environment because they are designed to kill or otherwise adversely affect living organisms."¹

In addition to threatening human health, the widespread contamination of the nation's waterways with pesticides has pervasive environmental effects, some of which are only beginning to be understood. Domestic wells can become contaminated with harmful chemical residues causing risk to rural families and communities. Surface water receiving runoff from cosmetic pesticides can negatively impact wildlife such as fish and waterfowl.

Surface Water

When pesticides are applied on gardens and lawns, rain washes some of the pesticides directly into rivers and lakes or into street gutters where the pesticides-contaminated water goes through storm drains and pipes and eventually flows into nearby water bodies. Some of the pesticides also end up in groundwater systems by leaching down through the soil. Small amounts also volatilize into the atmosphere, and then later fall back to land as precipitation.

A study by Environment Canada revealed that the most frequently detected pesticides in Toronto streams are diazinon, 2,4-D, and MCP, prompting the authors to conclude, "[... stormwater drainage systems may be conveying nutrients and pesticides used on lawns in urban areas to the Don River and

¹ U.S. EPA, Office of Pesticide Programs. "What is a Pesticide?"

Humber River watersheds and ultimately, into Lake Ontario.”² In a King County, Washington study, the United States Geological Survey (USGS) compared types of pesticides found in urban streams during rainstorms (time of high runoff) to sales data from nearby home and garden stores. The three most frequently purchased pesticides – diazinon, 2,4-D, and MCPP were detected in water samples from all the study sites. USGS also found that four of the five pesticides that exceeded recommended maximum concentrations were purchased by residents and applied in homes and gardens.³

Groundwater

In general, groundwater has a lower incidence of pesticide contamination than streams because the water gets filtered slowly through soil and rock, allowing for degradation and sorption into the soil. However, once groundwater has been contaminated, it takes many years or even decades to recover. A 1989 study found residues of 39 pesticides and their degradation products in the groundwater of 34 states and Canadian provinces.⁴

Recommendations:

The Manitoba Eco-Network Water Caucus strongly recommends that the provincial government adopt the precautionary principle. There are a plethora of studies documenting known contamination of waterways with hazardous pesticides linked to serious immediate and chronic health and environmental effects. At this point, nothing should prevent immediate action against the use of cosmetic pesticides. The Water Caucus recommends that the Province of Manitoba follow the example of provinces such as Newfoundland and Labrador, Ontario, Quebec, PEI, Nova Scotia, and New Brunswick by passing policies which ban pesticides use. Finally, it is important for our province to outline approaches to land management that are safe for the environment and public health.

Cosmetic pesticide legislation/regulation should include:

- A ban should include cosmetic use of chemical insecticides, herbicides and fungicides for residential, commercial, municipal, and institutional properties such as hospitals, long-term care facilities, schools, parks, government property and recreational facilities, near water and all urban and rural areas

² Struger, J., T. Fletcher, P. Martons, B. Ripley, and G. Gris. 2002. Pesticides Concentrations in the Don and Humber River Watersheds (1998-2000). Environment Canada, Ontario Ministry of Environment and Toronto Works and Emergency Service.

³ Voss, FD., SS. Embrey, and JC. Ebbert. 1999. Pesticides detected in urban streams during rainstorms and relations to retail sales of pesticides in King County, Washington. U.S. Geological Survey Fact Sheet 097-99.

⁴ Hallberg, GR., 1989. Pesticides pollution of groundwater in the humid United States. Agriculture, Ecosystems, and Environment.

- A ban on the sale and use of over-the-counter lawn care pesticide products, including the use of products containing 2,4-D for domestic lawn care, combination products, hose-end products, concentrates, products requiring preparation, and granular spreadable products

Sincerely,

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