



Canadian Cancer Society
Société canadienne
du cancer

About the Canadian Cancer Society

As you know, the Canadian Cancer Society is a charity whose mission is to eradicate cancer and enhance the quality of life of people living with cancer. We work on that mission here in Nova Scotia with the help and support of over 11,000 volunteers throughout the province. We provide practical and emotional support programs to Nova Scotians living with cancer, including The Lodge That Gives, a home away from home for thousands of Nova Scotians who need a place to stay when they have to travel to Halifax for cancer treatment.

The Case for a Cosmetic Pesticide Ban

The Canadian Cancer Society is also the largest national charitable funder of cancer research in Canada. We work to ensure that government policies on cancer treatment and prevention are informed by the very latest research by providing non-partisan evidence-based advice to all levels of government across Canada.

The Canadian Cancer Society applauds the Government of Nova Scotia for introducing Bill 61. The Society urges every provincial government to ban the sale and use of cosmetic pesticides, and with this bill Nova Scotia has taken the first step to joining Ontario and Quebec as the third province to enact an effective cosmetic pesticide ban. It is appropriate that Nova Scotia, as the province with the highest cancer incidence rate in Canada, should be among the first few provinces to take this step.

The Society is very concerned about the cosmetic and non-essential use of potentially cancer-causing substances. Our call for a ban on the sale and use of cosmetic pesticides is based on the large and growing body of evidence showing an association between pesticides and cancer.

In many cases, direct cause-and-effect between exposure to a particular chemical and cancer can be difficult or impossible to prove beyond all doubt. One reason for this is that we do not test chemicals on humans, which would be unethical. So we have to rely on animal testing and epidemiological evidence derived from observing cancer incidence among people exposed to pesticides in their daily lives. This evidence shows that exposure to pesticides at work is linked to higher incidence of non-Hodgkin lymphoma, leukemia, prostate cancer, brain cancers, kidney cancer and lung cancer. This correlation is not same as cause-and-effect evidence, but it is strong evidence nonetheless.

When you hear the pro-pesticide landscapers and pesticide manufacturers allege a lack of evidence for a ban, they are saying you should ignore the epidemiological evidence and only act on direct cause-and-effect evidence. Such evidence would generally be impossible to obtain without unethical human testing.

The better approach is to weigh the risks inherent in pesticide use against the benefits. The cosmetic use of pesticides provides no benefits. It is non-essential and the evidence shows that it poses risk, so it should be banned.

The Canadian Cancer Society is not the only organization to see it this way. We are part of a broad coalition of health and environmental groups that are united in our call for a cosmetic pesticide ban. Our conclusion that the current available evidence

justifies a cosmetic pesticide ban is shared by the Canadian Cancer Action Network, Breast Cancer Action Nova Scotia, the IWK Health Centre, Doctors Nova Scotia, the Nova Scotia College of Family Physicians, the Lung Association, the Public Health Association of Nova Scotia, the Environmental Health Association of Nova Scotia, the Ecology Action Centre, and many other health and environmental organizations in Nova Scotia and across Canada.

“Integrated Pest Management” Not an Appropriate Alternative

On the whole, Bill 61 provides the basis for an effective cosmetic pesticide ban in Nova Scotia. We congratulate the government for introducing a real ban, rather than so-called Integrated Pest Management, as proposed during the public consultation by pro-pesticide interests. IPM would continue to allow cosmetic pesticide use under a licensing system, and no amount of cosmetic pesticide use is justifiable given the risks to health and complete lack of health or practical benefits.

Canadian Cancer Society Supports Leaving Municipal By-laws In Place

We also applaud the government for leaving existing municipal by-laws untouched, rather than override them as proposed by the pro-pesticide interests during the consultation. The HRM pesticide by-law prohibits pesticide use in a few areas not covered by Bill 61 because it applies to all municipal property, regardless of its use or ground cover, so overriding municipal by-laws would have resulted in less health protection for HRM residents.

Definition of Lawn Leaves a Loophole to be Closed

The Canadian Cancer Society supports the proposal you will be hearing from several presenters today to close the loophole in the definition of “lawn” in section 4(1) of this bill. The current definition is limited to grass-covered areas. This leaves out the

parts of peoples' yards with other ground covers, such as patio stones, walkways and driveways. Weeds that appear between patios stones or in cracks in pavement should not be exempt from ban. They can be dealt with using alternative weed control methods, just like weeds in grass. This loophole would allow some high-risk pesticides to continue to be used in residential neighbourhoods, in yards where children play, and should be removed.

Regulations Need to Be Consistent with the Precautionary Principle

Finally, the most important factor that will determine whether or not Nova Scotians get effective health protection from this bill will be the regulations that follow it. Section 6(1) of the bill authorizes the Environment Minister to create, through regulation, a list of allowable pesticides that will be exempt from this ban. The Canadian Cancer Society supports this as long as the pesticides on this list are genuinely low risk.

Attached to our written submission you will find the list of allowable active ingredients for cosmetic pesticides under Ontario's cosmetic pesticide ban. It includes common household products like borax, cornmeal, agricultural lime and salt, as well as some bio-pesticides. The Canadian Cancer Society has been involved in creating this list with the Government of Ontario and other health and environmental stakeholders in that province, and we support Ontario's list. We hope to be consulted on the development of Nova Scotia's regulations as well.

Our experience in Ontario has made us very cautious about involving landscapers in the development of an allowed list. We were disappointed that some entered that process with the objective of lobbying for their favourite chemical pesticides, rather than protecting health. They claimed they wanted to base the list on scientific and

medical evidence, but continued to demand cause-and-effect evidence that would be largely impossible to meet ethically.

For Nova Scotia's cosmetic pesticide ban to be effective for protecting health, it will be vital to create the allowed list on the basis of the precautionary principle, which means the burden of proof must be to show that a pesticide is genuinely low risk before it goes on the list.

The Canadian Cancer Society agrees with exempting of the thirty-eight active ingredients on Ontario's current exemption list, but we would want to closely scrutinize any proposal to include pesticides with active ingredients not on that list, and hold those pesticides to a high burden of proof in accordance with the precautionary principle.

I would like re-iterate the Canadian Cancer Society's overall support for Bill 61 and congratulations to the Government of Nova Scotia for introducing it. Thank you.

CLASS 11 PESTICIDES

Ingredients contained in pesticide products that are biopesticides or lower risk pesticides. Licensed exterminators and persons who perform land exterminations in non-residential areas that use Class 11 pesticides are required to post a green notice sign to provide public notice of the use of these pesticides, unless exempt from posting under Regulation 63/09.

No.	A.I. Code(s)	ACTIVE INGREDIENT NAME
1.	ACE	ACETIC ACID
2.	AOA ^{***}	AMMONIUM SOAPS OF FATTY ACIDS
3.	AZD	AZADIRACTIN
4.	BSM	<i>BACILLUS SUBTILIS</i> MBI 600
5.	BSA	<i>BACILLUS SUBTILIS</i> QST 713
6.	BTB	<i>BACILLUS THURINGIENSIS KURSTAKI</i>
7.	BTT	<i>BACILLUS THURINGIENSIS TENEBRIONIS</i>
8.	BOA	BORACIC ACID (BORIC ACID)
9.	BNS	BORAX
10.	CAS	CAPSAICIN
11.	CIA	CITRIC ACID
12.	PCM ^{***}	CODLING MOTH AND LEAF ROLLER PHEROMONE
13.	CUB	COPPER AS ELEMENTAL, PRESENT AS TRIBASIC COPPER SULPHATE
14.	CUY	COPPER AS ELEMENTAL, PRESENT AS COPPER OXYCHLORIDE
15.	COR	CORN GLUTEN MEAL
16.	DLR ^{***}	DIALLYL DISULFIDE AND RELATED SULFIDES
17.	BLO	DRIED BLOOD
18.	FAH	FATTY ACID
19.	IRN ^{***}	IRON (PRESENT AS FEHEDTA)
20.	FRS	IRON (FERROUS OR FERRIC) PHOSPHATE
21.	FES	IRON (FERROUS OR FERRIC) SULFATE
22.	YUA	IRON (FERROUS OR FERRIC) SODIUM
23.	KAO ^{***}	KAOLIN
24.	SUS	LIME SULPHUR OR CALCIUM POLYSULPHIDE
25.	MOI, MOH	MINERAL OIL (HERBICIDAL OR PLANT GROWTH REGULATOR OR INSECTICIDAL OR ADJUVANT)

^{***} Pesticide has been added

Note: Under Section 4(1) of Regulation 63/09 under the Pesticides Act the Director has the authority to add or remove pesticides to maintain an updated list. Changes made to the list since March 4, 2009 are indicated for specific pesticides.

CLASS 11 PESTICIDES

No.	A.I. Code(s)	ACTIVE INGREDIENT NAME
26.	NUT***	NUCLEAR POLYHEDROSIS VIRUS OF DOUGLAS FIR TUSSOCK
27.	NUG***	NUCLEAR POLYHEDROSIS VIRUS OF THE GYPSY MOTH
28.	CAU	OIL OF BLACK PEPPER
29.	PAA***	PANTOEA AGGLOMERANS STRAIN C9-1
30.	PAD***	PANTOEA AGGLOMERANS STRAIN E325
31.	CAT	PIPERINE
32.	EGG	PUTRESCENT WHOLE EGG SOLID
33.	FSC	<i>SCLEROTINIA MINOR</i>
34.	SIL	SILICON DIOXIDE (DIATOMACEOUS EARTH)
35.	AFA, SOC	SOAP (ALKANOLAMINE SALTS OF FATTY ACID OR POTASSIUM SALTS OF FATTY ACID)
36.	NAC***	SODIUM CHLORIDE
37.	SUL	SULPHUR
38.	VRT***	VERTICILLIUM ALBO-ATRUM STRAIN WCS850

*** Pesticide has been added