



May 22, 2014

Clerk of Committees
Legislative Assembly of Manitoba
251 - 450 Broadway
Winnipeg, MB R3C 0V8

Dear Committee Members:

On behalf of the Association of Manitoba Municipalities (AMM), I would like to provide comments about Bill 55: *The Environment Amendment Act (Reducing Pesticide Exposure)*.

At the annual AMM Convention in November 2011, AMM members passed a resolution opposing a ban of cosmetic pesticides. Although Bill 55 will not ban all cosmetic pesticides, the AMM has presented a number of concerns that we feel are still valid with the introduction of this Bill.

While AMM members support measures to protect children's health and promote public safety, we have indicated in the past we feel it would be more effective to focus on public education.

As well, the AMM would like to emphasize that all pesticides are subject to the same scientific evaluation by the Health Canada Pest Management Regulatory Agency (PMRA) under *The Pest Control Products Act*. This includes 'cosmetic' pesticides intended for urban or residential use as well as organic pesticides. The AMM has confidence in current federal regulation of pesticides, and Health Canada already takes sensitivities of certain groups such as children and pregnant women into account in their reviews. However, members of the public may not be aware of the approval processes all pesticides must go through before they are made available in Canada, and this should be a focus of public education efforts.

Moreover, many of our members are concerned about the effects pesticide restrictions in urban areas may have on the spread of pests and invasive species to nearby rural areas. Many noxious weeds and other invasive species pose a real environmental threat to native Manitoban species. As well, since municipalities are responsible for noxious weed control under *The Noxious Weeds Act*, the AMM is concerned that a cosmetic pesticide ban will increase municipal weed control costs and make noxious and invasive species impossible to manage in a cost-effective way.

Additionally, the AMM urges the Province of Manitoba to consult with the AMM and the Manitoba Weed Supervisors Association (MWSA) on regulations to be developed as a result of this legislation, particularly on the prescribed pesticides to be identified in regulation whose use is prohibited according to sections 40.4 and 40.5 of Bill 55: *The Environment Amendment Act*.

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Finally, it is particularly important for the Province of Manitoba to cover for any enforcement and public education costs, instead of downloading these responsibilities to local governments.

The AMM appreciates the opportunity to provide these comments. Thank you for your consideration.

Sincerely,



Doug Dobrowolski
President

cc: Honourable Gord Mackintosh, Minister of Conservation and Water Stewardship