



# THE ONTARIO COLLEGE OF FAMILY PHYSICIANS

A CHAPTER OF THE COLLEGE OF FAMILY PHYSICIANS OF CANADA

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OFFICE OF THE CHIEF EXECUTIVE OFFICER

May 28, 2008

The Honourable Tony Clement  
Minister of Health  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
Postal Locator: 0906C  
Ottawa, Ontario K1A 0K9

Dear Mr. Clement,

In 1999, the Ontario College of Family Physicians (OCFP) conducted an extensive review of the literature and identified the profound health effects associated with exposures to pesticides, especially amongst pregnant women and their fetuses and infants and children. In 2002, Dr. Sheela Basrur, in her role as Medical Officer of Health for Toronto Public Health conducted a review of the literature related to house and garden pesticides that raised concerns similar to those found in the OCFP report. Pesticides are associated with some of the most costly and difficult to treat healthcare conditions. A further review of the literature in 2004 by the OCFP updated the literature and found a further strengthening of the evidence regarding the harmful effects of pesticides. As a result, doctors, nurses and concerned citizens from a number of highly respected health and environmental agencies came together to support cosmetic pesticide by-laws in Ontario and across Canada.

Information from the Pesticide Management Regulatory Agency (PMRA) referred to pesticides registered as "safe to use according to directions." Most recently, they have applied this language to the 2, 4-D decision. The pesticide industry uses such statements to try to mislead the public and municipal councils into believing that Health Canada had deemed pesticides to be "safe" (i.e. harmless). The OCFP met with the PMRA and a member of our organization was appointed on the advisory council of PMRA. The PMRA head at the time, Karen Dodds, agreed that the term "safe", made little sense and the policy that developed at that time included the replacement of term "safe" with the term "acceptable for use when label directions are followed." The PMRA confirmed this in correspondence with the OCFP in October of last year. Unfortunately, something has changed since that time and the PMRA has reverted to the use of "safe" for reasons that remain unclear, in spite of the enclosed email. Indeed, the correspondence seems to be an attempt to justify the indefensible position PMRA seems to have adopted once again. (See enclosed email from the PMRA)

We were dismayed to see that the PMRA was engaged in activities that seemed to be aimed at discrediting the Ontario governments' proposed ban on cosmetic pesticides. Not only was the term "safe" used in conjunction to the 2, 4-D decision but was also used in letters to the editor published in Kingston-Whig Standard, the Guelph Mercury the Kitchener-Waterloo Record and the Calgary Herald. The enclosed news release entitled, "Health Canada finds 2, 4-D can be used safely" is an example of media that concerns us (see enclosed press release). The article by Dan Gardner in the Ottawa Citizen is a good example of how the Health Canada messaging is being misinterpreted.

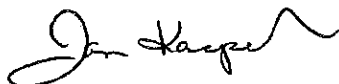
“Safe when used as directed” is a term that needs to be erased from PMRA’s vocabulary. The use of this term is contrary to recommendations of the Pest Management Advisory Council in 2006 and to PMRA’s assurances last year. It flies in the face of the combined evidence from toxicology and epidemiology and Canadians will tell you that it also flies in the face of common sense. There is no evidence to support pesticides being described as “safe”.

To your credit, Health Canada has taken on a leadership role in reviewing other chemicals which were once deemed acceptable for use. Bisphenol A is a good example of product recently taken off the market. Every time a product is deemed “safe” and then needs to be removed to prevent further demonstrated harm, Health Canada’s credibility, as an organization committed to the health and well-being of Canadians, is reduced.

The public trusts the family doctors of this country; they trust their nurses; they trust organizations like Cancer Society, the Ontario Public Health Association and the Registered Nurses of Ontario. The PMRA has placed Health Canada in a position of eroding the trust of healthcare professionals across the country and the people that we jointly serve.

We are asking you to review all further correspondence from the PMRA to ensure that Health Canada conveys credible information to Canadians. Information from Health Canada must be accurate and reliable. Canadians look to Health Canada to provide the information that is key to the actions they take to protect themselves and their children from environmental hazards. Health Canada must ensure that the Precautionary Principle is effectively conveyed. The message is simple –“pesticides and other harmful chemicals should be avoided whenever possible, especially amongst our most vulnerable citizens – fetuses, infants and children.”

Yours truly,



M. Janet Kasperski, RN, MHSc, CHE  
Chief Executive Officer

cc: The Honourable Dalton McGuinty  
The Honourable John Gerretsen  
The Honourable John Tory  
The Honourable Elizabeth Witmer

Encl.