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Charitable Registration  
Number 11924 8771 RR0001

September 14, 2007

FPT Secretariat

**Attention: Josee Beaudoin**

Pest Management Regulatory Agency, Health Canada  
Sir Charles Tupper Building  
2720 Riverside Drive, A.L. 6606D1  
Ottawa, ON K1A 0K9

Dear FPT Committee members,

**Re: Classification Harmonization for Canada, a Proposal for  
Domestic Class Pesticides, 2007**

On behalf of the Ontario Public Health Association (OPHA) Environmental Health Working Group, I am writing to provide comments on the proposal by the Federal/Provincial/Territorial Committee on Pest Management and Pesticides to harmonize federal and provincial classification systems for domestic class pesticides.

In 2001, the OPHA adopted the 'Resolution on the Non-Essential Use of Chemical Pesticides on Public and Private Lands'. Within the resolution, the OPHA resolved to urge municipalities to restrict the non-essential use of pesticides on public and private lands by urging the three levels of government to work together to strengthen legislation governing pesticide use, reduce the non-essential use of pesticide, educate the public about the health effects and alternatives to chemical pesticides, and promote Integrated Pest Management strategies. (Enclosed and available on line at [http://www.opha.on.ca/ppres/2001-02\\_res.pdf](http://www.opha.on.ca/ppres/2001-02_res.pdf) ).

The proposed harmonization of domestic class pesticides, with careful implementation, could reduce the use of non-essential pesticides by classifying domestic use pesticides as suitable for unrestricted domestic sale or as products for which the purchase will be controlled by the vendor. The opportunity for vendor and public education regarding pesticide use, alternatives to pesticide use, pesticide safety and potential human health impacts are beneficial potential outcomes.

The OPHA suggests that the following key components be considered in the domestic class pesticides harmonization:

- Pesticide/fertilizer and other lawn care pesticides that are not specifically referenced in the appendices of the PMRA Consultation Document (June 15, 2007) should be specifically included in the Controlled Products category.
- Vendor training programs need to include the knowledge requirements as stated in the document. A component of the training should include training on alternatives to pesticides. Consideration should be given to developing a recertification process for vendor training as well as consequences for vendors selling controlled products without successfully completing the training.
- The regulations related to the display and sale of controlled products needs to be confirmed, such as display in an area that is restricted to employees. Information regarding alternatives to pesticides could also be provided in this area to allow consumers to make informed choices.
- Implementation dates for these actions and reclassifications should be timely to meet current consumer needs.

In conclusion, we are encouraged by this initiative to implement federal/ provincial/ territorial harmonization of domestic class pesticides. However, the OPHA would hope to see a final document that provides the support to further restrict the non-essential use of pesticides on public and private lands. We would welcome the opportunity to participate in future consultations related to pesticide use reduction.

Founded in 1949, the OPHA is a volunteer, non-profit organization established to provide leadership on issues affecting the public's health and strengthen the impact of people who are active in public and community health throughout Ontario. The Environmental Health Workgroup is composed of people who are actively involved in research, policy analysis and/or health promotion related to environmental health issues, including air quality, water quality, pesticides, climate change and children's environmental health.

Sincerely,

Dr. Garry Aslanyan  
President

Attachments