

Subject: RE: PMRA | Questions and Answers about 2,4-D

Date: Tue, 12 Jul 2005 15:31:30 -0700

From: "Ernie Crist" <ernie_crist@dnv.org>

To: "John Hunter" <hunterjohn@telus.net>, "James Ridge" <James_Ridge@dnv.org>, "Mayor Harris" <Janice_Harris@dnv.org>, "Alan Nixon" <Alan_Nixon@dnv.org>, "Jim Cuthbert" <Jim_Cuthbert@dnv.org>, "Councillor Maureen McKeon Holmes" <mckeonholmes@telus.net>, "Richard Walton" <richard_walton@dnv.org>, "Lisa Muri" <lisa_muri@dnv.org>

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Dear Mr. Hunter:

I am truly sorry that you were disappointed. I was reading a story in the "Scientific American" a highly reputable publication and I am convinced that if I go to Hades, it will not be because I voted in favour of this B/L but if I do I will certainly argue the case with the Devil.

Ernie

From: John Hunter [mailto:hunterjohn@telus.net]

Sent: Tuesday, July 12, 2005 2:57 PM

To: James Ridge; Mayor Harris; Alan Nixon; Jim Cuthbert; Councillor Maureen McKeon Holmes; Richard Walton; Ernie Crist; Lisa Muri

Cc: 'Corrie Kost'; Council Remuneration; FONVCA; Pat Higgs DNV; Allan Orr; Brian Platts DNV; Cathy Adams DNV; Corrie Kost DNV; Doug MacKay Dunn Home; Eric Andersen DNV (new); 'Peter Thompson DNV'; 'Maureen Bragg'

Subject: FW: PMRA | Questions and Answers about 2,4-D

You can always count on Corrie! Great research Corrie.

PS Mayor Harris analogy last night in Council chambers claiming resistance to the "no pesticide/herbicide bylaws" is analogous to resistance to the anti-smoking bylaws in pubs and the spectre of job in that case (which job loss did not happen) is defective, I suggest.

Those anti-smoking bylaws were aimed at the customers primarily (you can't smoke in this and that place), although enforcement devolved to some extent on the business owner. This pesticide bylaw is aimed at both the customers AND the lawn care businesses – it forbids the business, practically speaking, from operating in DNV. It basically bans the business from operating in DNV UNLESS on public lands (they WILL get an exception) – there is sure to be an exemption for golf courses and parks, not so for residents, despite the platitudes. Talk about hypocrisy, as many speakers pointed out. "Natural pest control means won't work for DNV, but for you taxpayers" That did NOT happen to pub owners.

The proper analogy would be that government had banned professionally run pubs and forced people (as in prohibition days) to set up "speak-easys" as in the 1930s. And they tried in the 1930s, with the known results.

When will governments learn? You cannot stop socially acceptable things like pot, booze, and prostitution. The trick is education to make them NOT socially acceptable, not to use a stick as some would have, including C. Nixon and Crist to my disappointment. There has been lots of rhetoric but no solid evidence presented to council that they should overrule the feds, to my knowledge. Trotting out a few examples like DDT does not a solid case make.

The truly sad thing about last night's Council is a staff report which makes unsupported statements. Page 3: "This will effectively eliminate the use of many pesticides on residential properties, particularly the herbicides." Not a shred of evidence in the report to back this up, and no rebuttal to the letter from Mr. Charles which suggests, as I read it, that the bylaws have BACKFIRED in other jurisdictions. That is, professional lawn care was replaced by amateurs like me who use far more chemicals to do the job than the licensed, trained professionals. And I can sympathize with his points – if you threaten to fine me \$10,000 as this bylaw does, I'll use weed and feed (FAR worse) rather than the bit of spot spraying I do. My lawn is not going to end up like that weed infested mess at the bottom of my street (DNV property I assume, on Dollarton) or that up and coming weed mess on the Dollarton Hwy near Maplewood.

For staff to bring this to Council without any evidence pro or con that bylaws of like nature in other cities work is VERY disappointing. In fact, when the only input (it was in the Council package at the front desk) is that the bylaws have backfired elsewhere, it is to me inconceivable that this would come to Council. Was Mr. Charles wrong or biased? Who knows? But how can this topic go unaddressed in the report?

It seems a bit of a repeat of the staff Report to Council on the Burrard agreement a week or so ago, which contained no useful summary of the issues, the history, or anything that a responsible Council member should want to know. And the agreement vote is scheduled on the same night the band has a 15 minutes delegation to Council on the Band's history; as C. Walton pointed out, how can an intelligent and candid discussion take place? We don't need this type of performance.

Please Council members, don't let this sort of thing continue. Councillor Nixon spoke of disrespect for all Council in "vitriolic" e-mails to himself re pesticides. Well, with respect, you have to earn respect and you do that partly by demanding businesslike behaviour of yourselves and staff. Accepting the "jamming" you got on Burrard and pesticides will not do it. And accepting recommendations to pass an arguably intrusive bylaw with ZERO info in the report on whether they work elsewhere will not do it.


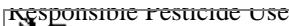


Sincerely and with deep disappointment

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-----Original Message-----

From: Corrie Kost [mailto:kost@triumf.ca]
Sent: July 12, 2005 1:16 PM
To: corrie@kost.ca; Bill Tracey; john hunter; 'Peter Thompson'
Cc: Brian Platts
Subject: PMRA | Questions and Answers about 2,4-D

				
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Questions and Answers about 2,4-D

The PMRA has conducted its re-evaluation of lawn and turf uses of 2,4-D. 2,4-D is a herbicide commonly found in weed control products used by homeowners on their lawns. The Agency has determined that 2,4-D can be used safely on lawn and turf when label directions are followed, and is therefore proposing continued registration of 2,4-D for lawn and turf use.

The PMRA is aware of public's concerns of domestic uses of pesticides on lawns and gardens (often referred to as cosmetic or aesthetic uses). The Agency has prepared the following questions and answers on the re-evaluation of 2,4-D and pesticide regulation in Canada to help clarify concerns on the safety of pesticide use.

If you have any further questions regarding the 2,4-D re-evaluation or about any other pesticide issue, please contact the PMRA's Information Services at 1-800-267-6315 or (613) 736-3799 from outside of Canada (long distance charges apply).

- [About the PMRA's re-evaluation of 2,4-D](#)
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About the PMRA's re-evaluation of 2,4-D

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How did PMRA conclude that 2,4-D can be used safely when label directions are followed? ■

The PMRA has just completed an exhaustive four-year re-evaluation of the lawn and turf uses of 2,4-D. The PMRA reviewed, the extensive body of information pertaining to the lawn and turf uses for 2,4-D. This includes an extensive proprietary database, published scientific information, foreign reviews and any use pattern information collected by the PMRA. (See 2,4-D Information Note for further definition of types of information assessed).

The PMRA examined all the scientific data and conducted a science-based assessment to determine if the product can be used safely. This assessment consisted of:

1. a health risk assessment that looked at the potential for 2,4-D to cause adverse health effects such as cancer, birth defects and endocrine disruption;
2. an assessment of all sources and routes (oral, dermal, inhalation) of potential exposure to 2,4-D, including exposure from the diet, drinking water and from contact with treated areas like lawns and gardens;
3. homeowner as well as occupational exposures (exposure encountered by the user/applicator of the product), both during and after application of 2,4-D;
4. a human health risk assessment which determines the toxicity in relation to the amount of exposure in all potentially exposed populations, including children;
5. an environmental risk assessment that considered risks to plants, birds, mammals, aquatic organisms, and fate in the environment; and
6. an assessment of value as it relates to the efficacy of the product;

To assess the safety of children and any potential 2,4-D exposure, the PMRA also took into consideration the unique physiology, behaviours and play-habits of children, such as their body weight and hand-to-mouth contact while playing on treated grass.

The Agency also consulted with an independent Science Advisory Panel which included government and university researchers in toxicology, biology and epidemiology. The Panel agreed with the risk assessment undertaken by the PMRA which determined that 2,4-D can be used safely when used according to label directions.

What additional measure is required by the PMRA as a result of the re-evaluation? ■

Buffer zones are required for liquid commercial class products that are applied by tractor-pulled field sprayers(e.g., to golf courses or sod farms), in order to protect adjacent non-target vegetatio.

Why did PMRA re-evaluate 2,4-D? specifically? ■

The PMRA is currently conducting a re-evaluation of all pesticides registered before January 1, 1995 to ensure they meet modern health and safety standards. This is part of a usual process. As scientific knowledge evolves and new information becomes available, the PMRA requires that registered pesticides be re-evaluated according to modern risk assessment approaches.(See [2,4-D Re-evaluation Information Note](#) for further details).

In 2000, the Agency also committed to re-evaluating the eight most commonly-used lawn and turf pesticides as part of its Action Plan on Urban Use of Pesticides, and 2,4-D is one of them.

Similar re-evaluation programs are conducted in other Organisation for Economic Co-operation and Development (OECD) countries such as the United States and the European Union.

How can 2,4-D be safe to use if the dioxins and furans contaminants in 2,4-D cause cancer? ■

Dioxins encompass a large family of chemicals. Certain types of dioxins are linked to potential cancer risks. This is why, starting in 1983, federal regulatory bodies required refined manufacturing processes to eliminate contamination of 2,4-D with those particular dioxins and furans. Monitoring data was collected after the new

manufacturing processes were put in place in 1983, to ensure the dioxins and furans of concern were not produced.

Any other types of dioxins present, are in very small amounts (parts per billion or ppb) and their potential health effects have been accounted for in the animal toxicity studies on 2,4-D that were examined during this re-evaluation.

What is the review status of the other commonly used lawn-care pesticides? ■

On September 27, 2000, the PMRA announced the priority re-evaluation of the 8 most commonly available lawn pesticides. This re-evaluation uses modern scientific standards to determine their continued acceptability for registration, and whether any changes need to be made to the conditions of registration of these chemicals

The re-evaluations are completed for four of the lawn pesticides: insecticides chlorpyrifos, diazinon and malathion (broadcast turf use), and the herbicide racemic mecoprop, are being phased out. The re-evaluation reviews for 2,4-D was released on February 17th, 2005 and the remaining two herbicides (dicamba, MCPA) are targeted for publication in early 2005. The insecticide carbaryl is underway, and is not expected to be completed this fiscal year.

Physicians groups say it can cause cancer in children. How can you say it's safe for use? ■

No other international regulatory body considers 2,4-D to be a human carcinogen. Based on all available and relevant data, the Agency agrees with this position.

When re-evaluating a pesticide, the PMRA has access to the available scientific information on that product including laboratory, epidemiology, and toxicology studies, scientific reports and more. No other group or organisation currently has access to all of that information. This allows PMRA to conduct thorough scientific assessments to determine if a product is safe for use or not when used according to label directions. The PMRA also determines allowable uses, doses and other label instructions for each pesticide product.

For 2,4-D, the PMRA considered the epidemiology literature some of which some suggested weak associations while others suggested no link between adverse health effects and the use of 2,4-D. In addition, the Agency reviewed the extensive database of toxicology information that specifically looked for the potential to cause adverse effects such as cancer.

The PMRA found that 2,4-D does not cause cancer and can be used safely by homeowners who choose to use it on their lawns when label directions are followed.

A recent Ontario Family Physicians Report published in April of 2004 recommended that the public limit their exposure to pesticides wherever possible by seeking alternative pest control methods, and, if using pesticides, educating themselves on their safe handling, mixing, storage and application. As the report notes, children are more susceptible to pesticides due to their behaviour and unique physiological characteristics. This is why the PMRA conducts specific risk assessments for sensitive subpopulations including children, and takes their unique physiological characteristics and behaviour into account.

A recent study in Québec found traces of pesticides in urine of children. Was there 2,4-D one of them? ■

The PMRA reviewed the study conducted by the Institut national de santé publique du Québec and found that the detected levels of phenoxy herbicide (2,4-D) were well below the levels of concern.

It is normal to find the presence of a pesticide or traces of any other environmental contaminant in tissues or fluids when an individual has been exposed to it.

However, exposure does not mean there will be a negative health effect, particularly if the levels are very small.

Does 2,4-D cause cancer and other serious illnesses? ■

No regulatory authority considers 2,4-D to be a human carcinogen.

Before a pesticide is approved for re-registration, it undergoes a scientific assessment for potential effects including cancer, birth defects, reproductive effects and pre- and post natal developmental effects. Epidemiology studies are also considered as a component of the scientific assessment.

As part of its re-evaluation of 2,4-D the PMRA considered the epidemiology literature some of which suggested weak associations while others suggested no link between adverse health effects and the use of 2,4-D. In addition, the Agency reviewed the extensive database of toxicology information that specifically looked for the potential to cause adverse effects such as cancer. The PMRA found that 2,4-D does not cause cancer and can be used safely by homeowners *who choose to use it* on their lawns when label directions are followed.

Does 2,4-D cause cancer in dogs if they walk on treated lawns? ■

Based on re-examination of the data, various scientists and workgroups have concluded that there is no relationship between 2,4-D use and canine malignant lymphoma (CML).

Although a 1991 article by the National Cancer Institute (NCI) indicated a link between dogs with CML and dog-owners that applied 2,4-D to their lawn, a 1991-1992 independent panel concluded that the study design was severely flawed and, in fact, did not show an association between CML and 2,4-D use. In 1999, scientists at Michigan State University re-examined the NCI data and also concluded that there was no relationship between 2,4-D use and CML.

Should I be concerned about exposure to 2,4-D from track-in of residues into my home? ■

No. A risk assessment conducted for adults and children exposed to 2,4-D as a result of playing on recently treated turf, considered the combined oral and dermal exposure and indicated no unacceptable risks. Since the levels of 2,4-D that have been measured in house dust are much lower than the concentrations on soil and turf, for which no concern was identified, the potential exposure from 2,4-D residues inside the home is not a cause for concern.

Should I be concerned about exposure to 2,4-D from spray drift? ■

No. Risk assessments conducted for individuals applying 2,4-D to residential turf indicated no unacceptable risks. Available data suggest that spray drift exposure to bystanders near the application area would be at least 100 to 1000 times less than the exposure to applicators for whom health and safety factors have already been considered.

How long does 2,4-D stay present in the environment? ■

2,4-D is not considered to be persistent on turf. Studies from both industry and independent sources show that 2,4-D residues on turf decline quickly.

PMRA's consideration of Canadians' Health

- [How are the health risks from pesticide use assessed, including risks to children?](#)
- [How does the PMRA identify the hazards and evaluate the health risk associated with 2,4-D?](#)
- [Where can I find more information on the PMRA's health risk assessment?](#)

How are the health risks from pesticide use assessed, including risks to children? ■

Pesticides are stringently regulated in Canada. Before a product is registered for use, it must undergo a comprehensive and rigorous scientific assessment to determine that the product does not pose unacceptable risks to human health or the environment. If the assessment does not indicate that a product can be used safely, it is not registered for use in Canada. Pesticides undergoing re-evaluation must meet that same standard of regulation.

The human health risk assessment looks for the short- and long-term potential of a pesticide to cause adverse health effects such as cancer, birth defects and endocrine disruption. A broad range of toxicity studies are examined, which must be conducted following strict methodologies. Dose levels that cause an effect in laboratory animals as well as the dose where no effect is observed are noted. The dose where there is no effect is then compared to levels that people may be exposed to, in order to determine how far apart these numbers are - the larger the difference (i.e., the farther apart the numbers are), the better in terms of ensuring that risk is minimal.

All sources and routes (oral, dermal, inhalation) of potential exposure are assessed, including exposure from the diet and drinking water and from contact with treated areas like lawns and gardens. As well, occupational exposures, both during and after pesticide application, are considered.

Because some population groups may be more susceptible to potential effects of pesticides, the assessment includes the application of extra safety factors to ensure that the most sensitive sub-populations, like children and pregnant women, are protected. Special attention is also given to the unique exposures and physiological characteristics of children, ensuring that factors such as their unique behaviors, different diets and lower body weights are considered.

Pesticides are only registered if there is a wide enough margin of safety between what people are exposed to and the highest dose that causes no effects according to scientific research. Normally this difference is 100 to 1000-fold. When a registered product is used according to label directions and when good hygiene practices are followed, exposure will usually be minimal and pose no risk.

How does the PMRA identify the hazards and evaluate the health risk associated with 2,4-D? ■

In order to identify the potential hazards of a chemical, it is tested at dose levels that are many times higher than the level to which humans would be exposed, and testing is done over both short and long term durations and via different routes of exposure (e.g., dietary vs. dermal [skin] exposure).

Although a given chemical may be toxic at high doses, lower doses are less toxic. Part of the risk assessment is to apply safety factors so that under conditions of normal use, there is a sufficient margin of safety (typically a 100-1000 fold difference) between potential exposure levels to humans and any toxic effect noted in laboratory tests.

When a registered product is used according to label directions and when good hygiene practices are followed, exposure will usually be minimal and pose no risk.

Where can I find more information on the PMRA's health risk assessment? ■

You can consult the About PMRA web section under Registration Process for a more detailed account of the Agency's health risk assessment.

The [Children's Health Priorities within the Pest Management Regulatory Agency](#) Science Policy Notice is another resourceful document detailing the Agency's

commitment to protecting children's health.

Finally, the [Decision Framework for Risk Assessment and Risk Management in the Pest Management Regulatory Agency](#) Science Policy Notice is a detailed guide document on the decision making process at PMRA.

2,4-D decisions in the United States

How do the EPA and PMRA re-evaluations compare? ■

The approach and outcome of the PMRA and US EPA assessments are similar.

The US EPA re-evaluation released in January 2005 is the most recent reassessment of 2,4-D. It also found 2,4-D to be acceptable for use on lawn and turf.

The PMRA re-evaluation of 2,4-D has been split into two parts: review of the turf uses, which was announced in 2000 ([REV2000-04](#)), and review of the agricultural uses, which is targeted for completion later in 2005.

General questions about pesticides

- [A lot of municipalities are looking at banning pesticides. Why can they do this when the federal government allows them to be on the market?](#)
- [What should homeowners do if they're concerned about pesticide use?](#)
- [Are there any alternative pest control methods or products for use on my lawn?](#)

A lot of municipalities are looking at banning pesticides. Why can they do this when the federal government allows them to be on the market? ■

Pesticides must be registered before they can be imported, manufactured, sold or used in Canada. The PMRA is responsible for administering the Pest Control Products Act (PCPA) on behalf of the Minister of Health. Registration under the PCPA requires a thorough scientific evaluation to determine that new pesticides are acceptable for a specific use and that registered pesticides remain acceptable for use, once on the market. If Canadians choose to use pesticides, they can only use a pesticide registered by the federal government for the pests and treatment areas listed on the label, and use them according to the label directions.

The provinces and territories have the authority to enact regulations to restrict or prohibit the use of products that are registered under the PCPA in their jurisdictions. These regulations can be more restrictive than the PCPA or other federal regulations, but cannot be less restrictive. For example, provinces and territories require pesticide use permits and impose additional use restrictions; regulate the transportation, sale, use, storage and disposal of pesticides; regulate the training, certification and licensing of pesticide applicators and vendors; and respond to spills or accidents.

Provincial and territorial governments may also allow cities, towns and municipalities to enact bylaws to set further regulations on pesticide use based on local considerations including use restrictions. (See: [Roles of the Three Levels of Governments Regarding Pesticides in Canada Information Note](#))

What should homeowners do if they're concerned about pesticide use? ■

The PMRA suggests that Canadians get informed about the pest they wish to control and explore all the options available to them. Prevention is key. [Pest Notes](#) are available that provide information on how to deal with common household pests. The [Healthy Lawns website](#) ■ contains information on how people can maintain a healthy lawn that can better resist pests, thus reducing reliance on pesticides.

If you decide you need to use a pesticide, make sure you use a registered product and that you read and follow the label directions. The label tells you how to use a

product safely. Do not use a pesticide to control a pest that is not listed on the label. Always use pesticides for their intended purposes. To prevent accidental poisonings, ensure that pesticides or any other household chemicals are stored safely out of reach of children and pets, and are appropriately labeled.

Are there any alternative pest control methods or products for use on my lawn? ■

Pest prevention is key. One of the roles of the PMRA's Urban Pest Management Section is to promote Integrated Pest Management (IPM) practices that include a variety of methods to effectively control pests and prevent lawn and garden infestations. Visit the [Healthy Lawns website](#) ■ for tips on how to maintain a healthy lawn.

The PMRA also publishes a list of [Pest Notes](#) which provide useful tips on how to effectively control common household pests.

More information on 2,4-D:

- [When was 2,4-D first registered?](#)
- [Is 2,4-D Agent Orange?](#)
- [How do I submit comments on this re-evaluation of lawn and turf uses for 2,4-D?](#)
- [What is the status of the 2,4-D re-evaluation of agricultural uses?](#)
- [What are label improvements?](#)
- [What are the proposed label improvements for 2,4-D turf and lawn uses?](#)
- [What is the difference between commercial and domestic class pest control products?](#)



When was 2,4-D first registered? ■

2,4-D was first registered in 1946.

Is 2,4-D Agent Orange? ■

No, 2,4-D is not Agent Orange. 2,4-D was a component of Agent Orange, along with TCDD-contaminated 2,4,5-T. TCDD is a dioxin that has been proven to cause cancer and 2,4,5-T is no longer on the market and with the refined manufacturing processes that have been imposed by federal regulatory bodies over the years, 2,4-D contamination of dioxins and furans is no longer expected.

How do I submit comments on this re-evaluation of lawn and turf uses for 2,4-D? ■

As part of its normal process, the PMRA is inviting public, stakeholder and scientific comment on its re-evaluation of 2,4-D for lawn and turf uses. The purpose of this consultation is to provide stakeholders, including the general public, with the scientific assessment of this re-evaluation, and to allow for the provision of any additional information that may be relevant to the re-evaluation.

Details on the re-evaluation of 2,4-D can be found in the Proposed Acceptability for Continued Registration document ([PACR2005-01](#)) Re-evaluation of the lawn and turf uses of 2,4-D. The comment period ends on April 22, 2005.

What is the status of the 2,4-D re-evaluation of agricultural uses? ■

The 2,4-D review of the agricultural uses is targeted for completion later in 2005.

What are label improvements? ■

Label improvement is an ongoing process. Pesticide labels are legal documents that users must comply with in accordance with the Pest Control Products Act. They provide information to the user on the use conditions of a product. Use rates and use patterns (i.e., how, when and how much of the product is applied) specified on

the product label. These directions consider the acceptable exposure levels. They also contain many standard statements such as instructions for disposal, etc.

In 1994, a label improvement program was implemented for 2,4-D to reduce both occupational and public exposure. It improved label clarity, consistency and accuracy. The new label directions included common-sense precautions such as wearing long clothing and gloves when applying the product and washing up when application is complete.

What are the proposed label improvements for 2,4-D turf and lawn uses? ■

Label improvement recommendations resulting from the current re-evaluation:

- Set all label rates to the lowest effective level, as per PMRA policy for all pesticides. This further minimizes exposure to the products.
- Provide instructions for both domestic and commercial products to reduce accidental contamination of water and increase the protection of non-target vegetation.

What is the difference between commercial and domestic class pest control products? ■

All pest control product are classified for their intended use.

Domestic Class products are sold for consumer use in and around their home. The intent of domestic classification is to provide consumers with relatively safe products for such uses as, insect and rodent control within the home, weed control in lawns and gardens, and swimming pool disinfection.

Commercial Class products are sold for general use in the commercial activities listed on the label. The intent of commercial classification is to provide operators of commercial pest control operations, such as lawn care service providers, with products that can be used safely and efficaciously in their particular business.

Last updated: 2005-03-03



[Important Notices](#)