

From: [Hannah Barron](#)
To: [councilmeeting](#)
Subject: My comments for 2019.PH10.4 on November 26, 2019 City Council
Date: November 25, 2019 10:17:24 AM

To the City Clerk:

Please add my comments to the agenda for the November 26, 2019 City Council meeting on item 2019.PH10.4, Amendments to Chapter 354, Apartment Buildings, and Progress Update on RentSafeTO

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Comments:

On behalf of Toronto-based environmental organization, Earthroots, I submit concerns regarding the use of pesticide products and killing devices in Toronto rental apartments and RentSafeTO's program.

Ontario's *Fish and Wildlife Conservation Act* (2002; hereafter FWCA) regulates wildlife management, including wildlife management and destruction activities conducted by pest control agents, private landholders and all members of the public.

We applaud the city for its work to increase transparency and public health within Toronto's large housing rental community through its various programs including RentSafeTo. However, we are concerned that program information for tenants and landlords fails to address that Ontario's FWCA prohibits the use of adhesives (AKA glue traps) and poisons (e.g. anticoagulant rodenticides) for the destruction of wildlife such as rodents.

Both adhesives and toxicants are indiscriminate killers. Certain toxicants, including anti-coagulants, pose health and safety risks to people—especially children--, pets and other wildlife. Furthermore, these killing methods are illegal due to their inhumaneness.

The following sections in the FWCA's Safety and Methods chapter address the use of poison and adhesives. Please note that there are no regulations for exempted circumstances.

Poison

29 (1) A person shall not use poison to kill, injure or capture wildlife.

Exceptions

(2) Subsection (1) does not apply in the circumstances prescribed by the regulations. 1997, c. 41, s. 29.

Adhesives

30 (1) A person shall not use adhesives to kill, injure or capture wildlife.

Exceptions

(2) Subsection (1) does not apply in the circumstances prescribed by the regulations. 1997, c. 41, s. 30.

Please include this information to the public, tenants and landlords, and indicate what steps the City of Toronto will take to address our concerns. For more information, contact Hannah Barron, Director of Wildlife Conservation Campaigns, Earthroots: hannah@earthroots.org.

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