905-718-7248
Allison Hansen
hansenallisonm@gmail.com

Toronto City Council
City hall Toronto
Avenue Road, 1008
Toronto ON, Canada

July 20, 2022

Statement in Support of Rodenticide Reform

We write to express our support and gratitude for the progressive improvements the City of Toronto has proposed to safeguard the wellbeing of animals and their coexistence with humans. Recognizing the complexity of issues affecting animals and the environment, we truly appreciate the thoughtful approach that the City of Toronto has undertaken to reach the most effective policies possible.

In the context of reviewing the proposed additions related to the feeding of wildlife, it has come to our attention that amending the City's pesticide policies would compliment current reform efforts as well as address an urgent need to restrict products posing serious threats to animals including family pets and wildlife species, the environment, and to human health. Given Toronto's leadership in the past on pesticide reform, we are hopeful that the City will again serve as an example for other jurisdictions aiming to protect the health and welfare of Ontarians.

Below we have provided background information related to rodenticides and legal framework governing these products as we understand it. We have also included a Draft By-law amending Chapter 612 of Toronto's Municipal Code titled Use of Pesticides. We believe the draft would achieve the desired reform while adhering to Toronto's existing style and framework.

In summary, rodenticides are a significant problem in Ontario, and in Toronto in particular. Please eliminate proposed exceptions that would continue to allow the use of these toxic products (Chapter 349-10.1(i-ii)). Please also consider the reform discussed herein. Choosing chemical free rodent proofing alternatives and discontinuing wildlife feeding will ensure that the City of Toronto is taking a proactive step to address any rodent issues, and keep our children, companion animals and wildlife safe.

The harms posed by rodenticides are significant.

Chemicals classified as rodenticides vary in their active ingredients, but generally aim to kill unwanted pests by preventing normal blood clotting, causing internal hemorrhaging, or disturbing nervous system functions. These compounds, enhanced with attractive flavours and colours, are commonly placed in and around homes and commercial areas to attract unwanted wildlife, leading to death.

Animals that ingest rodenticides and/or poisoned prey experience great pain and suffering over a period of days or weeks, most often leading to death. This means that animals can continue to feed on the baits, thus accumulating a significant level of rodenticides in their livers before they finally die. High levels of these poisons can remain in the livers of carcasses for months. Predators and scavengers that feed on these poisoned animals face secondary rodenticide poisoning.

Many of Ontario's native and at-risk species face high risks of rodenticide poisoning. In addition to rats, small animals including songbirds, shrews, voles, and other non-target mammals and invertebrates are known to access bait boxes containing these poisons. This direct feeding is contaminating the food-chain and wider ecosystem: coyotes, bobcats, foxes, skunks and other mammalian predators that feed on small animals have been found to have rodenticides in their systems. Owls and other raptors are at a particularly high risk of secondary poisoning because of their dependence on rodents as a food source. A recent study found detectable levels of one or more rodenticides in 62% of raptors tested between 2017-2019 in Ontario.

In addition to animal and ecosystem impacts, rodenticides are known to bioaccumulate and persist in the environment posing human health risks. Recently, researchers in the United States have even measured traceable levels of ingestible rodenticides in the milk supply. The American Association of Poison Control Centers receives approximately 10,000 reports of rodenticide exposures in children annually in the U.S.

Rodenticides do not control pest populations long-term and better solutions are available.

Rodenticides do not address the root of rodent infestation problems. Rats are drawn to areas where they have access to food and shelter; therefore, structural access points to these resources must be addressed if rats are to be permanently removed. By eliminating the resident rat population, rodenticides clear the way for a new population to move in and in response to the thinning of their populations, poisoned rats mate faster in the weeks before their deaths. Relying solely on methods of killing facilitates the rebound of populations.

Additionally, raptors and other predators that feed primarily on rodents serve as a natural and chemical-free method of pest control. A single owl eats around 1,000 rats per year.

A common misconception propagated by the pest control industry is that banning poisons will make rat problems worse – the reality is that our reliance on poisons is perpetuating infestations. Clearly poisons are counter-productive, evidenced by the fact that pest control companies remain on contracts to supply poisons for indefinite durations of time. Consistent with these facts, a majority of surveyed pest control professionals believe that while poisoning is the easiest and cheapest method of controlling rats, this strategy fails to provide a long-term solution because it fails to deal with the factors promoting and sustaining rat infestations.

Moreover, while some pest management companies claim that rodenticides usually cause rats to return to their nest or another inaccessible place to die, studies indicate that the pre-lethal effects of rodenticides make the rodent more accessible to predators. Rats are observed to die above ground, increasing the risk of exposure of both predators and scavengers. Poisoned rats have been observed to spend more time outside of their dens, even during daylight hours, expanding their availability to both diurnal and nocturnal predators. They also tend to remain motionless in the presence of observers, rather than bolting into hiding.

Current provincial and federal legislation are inadequate to protect against the risks of rodenticides.

In Canada, pesticides - including rodenticides - are regulated by a multi-tiered legislative scheme. The mandate of the federal Pest Control Products Act (PCPA) is to protect the health of Canadians and the environment against unacceptable risks from the use of pesticides. Reasonable certainty that no unmitigable harm to the environment is required to justify the registration of pest control products.

At one time, the legal and regulatory framework governing the sale and use of pesticides in Ontario was considered model legislation for Canadian provinces seeking to further reduce pesticide use in their jurisdiction. However, in 2020, Ontario's Ministry of the Environment, Conservation and Parks adopted amendments to its Pesticides Act and Regulations. In addition to expanding the number, conditions, and allowable uses of some products, these changes (1) eliminated Ontario's Pesticides Advisory Committee (OPAC) previously mandated to provide important nonpartisan scientific guidance functions related to health and environmental risk, and (2) reduced Ontario's 12-tiered classification system to align with the more simplistic federal regime prescribed by Health Canada's Pest Management Regulatory Agency (PMRA). As a result, pesticides (including rodenticides) are now immediately available for use upon federal registration with no further research or review at the provincial level.

Recognizing the risks rodenticides pose to human health and the environment, in 2013 Health Canada enacted risk mitigation measures for several commercial class rodenticides. However, recent research in Ontario, and across Canada demonstrates that these measures are ineffective and merely symbolic. Restricting the most toxic rodenticides to indoor use and requiring these products to be kept in tamper-proof bait boxes fails to consider the documented fact that rodents do not die inside these boxes and instead spread themselves away into the surrounding natural habitats.

The federal and provincial governments have an obligation to treat the well-being and protection of the environment as a primary consideration. It follows that rodenticides should not pose any unacceptable risks if their use is to be permitted. Despite acknowledging that rodenticides are highly and acutely toxic compounds that pose serious threats to the health and safety of children and non-target species, the federal government continues to register these products, and Ontario continues to allow them to be used.

Toronto must take the lead on pesticides again by enacting legislation to prohibit rodenticides.

The City of Toronto is well known for pioneering changes in pesticide policies in the interest of protecting the health and welfare of its citizens. Torontonians are, once again, calling on their government to lead the way by taking a strong stand against rodenticides. The Pesticides Act (Section 7.1 (5)) renders inoperable municipal by-laws addressing the use, sale, offer for sale or transfer of a pesticide that may be used for a cosmetic purpose. However, it does not preclude municipalities from enacting policies deemed desirable and in the public interest for protecting wildlife, pets, and people from unreasonable adverse effects caused by rodenticides and other inhumane pest management methods. While it is now widely understood that rodenticides are unnecessary, and ineffective over the long-term, rodenticides were clearly not contemplated as a part of sweeping reform related to lawn and garden products in the early 2000s.

Alternative approaches to poisons do exist, and a transition to chemical-free methods could be done with relative ease and would prove cost-effective for both consumers and the government in the long run. The primary step that sustainability-oriented pest management companies recommend is "rat-proofing" the premises of buildings by addressing the active and potential access-points in the structures. Food and other resources that attract rodents must also be secured or eliminated. It is in the economic interest of pest control companies that use poisons to ignore these steps, as permitting such conditions to persist invites new populations of rats to invade, thus giving rise to continued business.

The City of Toronto's Municipal Code already recognizes the importance of ongoing proactive pest management to effectively mitigate wildlife conflicts. (See for example, 629-9. Pest control). Additionally, companies providing sustainability-oriented pest management services at a competitive, or even lower price, than other pest control companies are rapidly emerging in the GTA. Incentivizing the pest control industry to adapt will facilitate more humane, innovative, and thoughtful solutions.

There is overwhelming evidence that the Province has taken the wrong approach to managing pest populations. If rodenticides were an effective solution, businesses, farmers, and municipalities would not have ongoing contracts with pest control companies for indefinite rodenticide application. The extensive data before us evidences that mere restrictions are not enough. Rodenticides need to be a thing of the past, and as stewards of the environment, local governments must protect wildlife and future generations against the devastating harms they pose.

We appreciate your time and attention to this important issue and sincerely hope the materials we have provided are helpful. Please feel free to reach out with questions that arise as you review. We would be pleased to serve as a resource as you consider next steps forward.

Respectfully submitted,

Lindsey Zehel, J.D., LL.M.
Executive Director | Defend Them All Foundation
Portland, Oregon, United States

Allison Hansen
Campaign Director | Rodenticide Free Ontario
Minden, Ontario, Canada

Deanna Pfeifer
Campaign Director | Rodenticide Free BC
Saanich, British Columbia, Canada

RODENTICIDE FREE ONTARIO

Traditional rodent control products such as chemical poisons ("rodenticides") and glue boards are inhumane, and pose serious threats to family pets, wildlife species, the environment, and human health. Furthermore, these methods fail to control unwanted rodent populations over the long-term. Comprehensive policy reform is required to protect Ontario's natural ecosystems and reflect the federal and provincial governments' obligation to treat the well-being of the environment as a primary consideration.

HARMING NATIVE AND ENDANGERED SPECIES

RODENTICIDES vary in the active ingredients they include, but generally aim to kill rodents and other mammals by preventing normal blood clotting, causing internal hemorrhaging, or disturbing nervous system functions. These compounds, enhanced with attractive flavors and colors, are commonly placed around structures to attract unwanted wildlife, leading to death.

Many of Ontario's native and at-risk species face high risks of rodenticide poisoning. In addition to rats, small animals including songbirds, shrews, voles, and other non-target mammals and invertebrates are known to access bait boxes containing these poisons. This direct feeding is contaminating the food-chain and wider ecosystem: coyotes, bobcats, foxes, skunks and other mammalian predators that feed on small animals have been found to have rodenticides in their systems. Owls and other raptors are at a particularly high risk of secondary poisoning because of their dependence on rodents as a food source. A recent study found detectable levels of one or more rodenticides in 62% of raptors tested between 2017-2019 in Ontario.

Animals that ingest rodenticides or poisoned prey experience great pain and suffering over a period of days or weeks, most often leading to death.

GLUE TRAPS are adhesive trays or boards designed to immobilize mice or small animals who walk across or land on its surface. Ensnared animals experience extreme pain, suffering and fear in the days that follow commonly ripping skin, and limbs in an effort to escape as starvation and dehydration slowly lead to death. There is no way to limit or restrict a glue trap to only target rodents, and as such, these devices also harm snakes, birds, lizards, bats, and even companion animals.

RODENTICIDE FREE ONTARIO

THREATENING HUMAN HEALTH AND PETS

RODENTICIDES are known to bioaccumulate and persist in the environment posing human health risks. Recently, researchers in the United States have even measured traceable levels of ingestible rodenticides in the milk supply. The American Association of Poison Control Centers receives approximately 10,000 reports of rodenticide exposures in children annually in the U.S. Health Canada has determined observations in the U.S. to be representative of the situation in Canada.

Since rodenticides are intended to be palatable for their target species, pets are also inclined to consume these toxic products. Dogs and cats may also hunt or catch poisoned rodents, putting them at risk of internal bleeding and death.

GLUE TRAPS may expose humans to hantavirus infections through touching or inhaling bodily fluids released when rodents are captured, according to Health Canada.

ONTARIO MUST ELIMINATE OUTDATED, INEFFECTIVE PEST CONTROL METHODS THAT ARE COUNTERPRODUCTIVE AND MORE COSTLY IN THE LONG-TERM

Addressing the root cause of a rodent issue by preventative resource management and exclusion (rodent-proofing) is the best long term pest management strategy. That is, preventing access to food and shelter on the property thereby removing vector attractants, locating and closing off all entry points, and maintaining these measures.

Clearing a resident population simply makes space for new groups to move in. By distracting from the root of the problem (i.e., accessible food and shelter), relying on rodenticides and glue traps permits infestations to rebound. Furthermore, poisoned rodents mate faster to compensate for their thinning numbers. Rodenticides also reduce the efficacy of free, natural rodent control by poisoning raptors and other rodent predators. For instance, a single barn owl consumes an average of 1,000 rodents per year.

In the event that rodent intrusion does occur, humane and sustainable alternatives do exist. A transition to cruelty and chemical-free methods can be accomplished with relative ease, and have proven to be effective in Canadian jurisdictions.

RODENTICIDE FREE ONTARIO

RISKS POSED BY THESE PRODUCTS ARE INCONSISTENT WITH ONTARIANS' VALUES, AND WITH THE GOVERNMENT'S OBLIGATIONS.

The existing risk mitigation measures are incapable of addressing the threats that rodenticides pose to the environment. Requiring rodenticides to be kept in tamper-proof bait boxes does nothing to stop target and non-target animals from directly consuming these products and thereafter being ingested by predators. Rodents have been shown to feed on highly toxic indoor-restricted baits and move outdoors. Further, poisoned rodents have been found to spend more time outside of their dens during all hours of the day and die above ground. Since rodents will disperse away from buildings and into surrounding natural habitats, the secondary-exposure risk for predators is not acceptedly mitigated. The hazards of glue traps are similarly indiscriminate and impossible to mitigate.

THE SOLUTION

The precautionary principle enunciated by the federal Pest Control Products Act provides that full scientific certainty is not required to amend or cancel the registration of a product where there are reasonable grounds to believe such action is required to alleviate a threat to the environment. It follows that rodenticides should cease to be registered. To the contrary, despite acknowledging that rodenticides are highly and acutely toxic compounds that pose serious threats to the health and safety of children and non-target species, the federal government continues to register these products, and Ontario has chosen to align its classification system with this inadequate framework making rodenticides immediately available for sale and use upon federal registration.

Fortunately, municipalities have the authority to further restrict the use and sale of dangerous pest control products within their jurisdiction, and have demonstrated leadership in perpetuating similar provincial reform in the past. It's time to update our approach to animal welfare and environmental protection for the well-being of current and future generations by (a) prohibiting the use and sale of rodenticides and glue traps; and (b) urging the Ministry of the Environment, Conservation and Parks (MECP) to ban all rodenticide products in Ontario without exception.

RODENTICIDE FREE ONTARIO

CONTACT:

Hansenallisonm@gmail.com
905-718-7248

DEFEND THEM ALL FOUNDATION

BAN RODENTICIDES **NOW** ONTARIO

ORGANIZATIONAL SUPPORTERS

Woodlands Wildlife Sanctuary

Animal Save Movement

The Fur-Bearers

Minden Cat Angels
Minden Ontario

Procyon Wildlife
Working to Preserve Ontario Wildlife in Their Natural Habitat
Voted 2021 Wildlife Rehab Centre of the Year!

EH! Environment Haliburton!

Raptors are the Solution

Bear With Us
www.bearwithus.org

The Bruno Project

Coyote Watch Canada

Kawartha Wildlife Centre

poison free Malibu
earth friendly Management

FLAP Canada
est.1993

AEL Advocacy
Animal Environmental Legal Advocacy

BAN RODENTICIDES **NOW** ONTARIO

ORGANIZATIONAL SUPPORTERS

ACTION VOLUNTEERS FOR ANIMALS
AVA
1972 - 2022
CELEBRATING 50 YEARS

OntarioWildlifeRescue.ca