

BRIEFING NOTE FOR THE MINISTER: PROVINCIAL BAN ON RODENTICIDES

PURPOSE

Rodenticides, also known as “rat poisons”, pose serious threats to wildlife species, the environment to human health, while at the same time failing to control rodent populations over the long-term. On behalf of the citizens, wildlife, pets, and ecosystem, the Rodenticide-Free BC Campaign recommends a province-wide ban on these harmful products.

BACKGROUND

Rodenticides are ingestible pesticides used to kill rats, mice and other target rodents. While the B.C. government acknowledges that rodenticides are highly toxic and present a moderate to high risk of secondary poisoning to other animals, the B.C. *Integrated Pest Management Act*, SBC 2003, c. 58 (“*IPMA*”) permits their continued use.

Over the last decade numerous animal welfare organizations and concerned citizens have noted that these ingestible rodenticides poison non-targeted species at all levels of the food chain. Species that have been significantly impacted by these rodenticides include owls, hawks, small birds, earthworms, coyotes and cougars, as well as children and family pets. Recently, researchers in the U.S. have measured traceable levels of ingestible rodenticides in the milk supply. Continuing research has demonstrated that rodenticides are not decreasing rat infestations but rather facilitate the rebound of rat infestations. In the pest management industry rodenticides are recognized as only a short-term solution. Other preventative measures, including remediating structural access points, are known to be far more effective in reducing pest concerns over the long term.

CURRENT SITUATION

The use of a popular rodenticide, bromadiolone, has increased 279% over a recent 12-year period. Not unexpectedly, countless reports of dead or dying owls, hawks and other raptors have been published in the media over the past several months. In response to growing public concern, numerous municipalities across British Columbia have banned rodenticides on city-owned properties. (See Appendix A). Municipalities are asking the Ministry of Environment & Climate Change Strategy to implement a province-wide ban of these rodenticides, as they lack the necessary jurisdiction. Over thirty animal, wildlife and environmental protection organizations have publicly endorsed this ban (see Appendix C).

POTENTIAL POLICY OPTIONS

1. Implement a complete ban on the sale and use: As rodenticides pose unacceptable risks to the environment and human health, and are proven to be ineffective in reducing their intended pest management target, this option would be most consistent with the Province's obligations under the *IPMA*. However, pushback from the pest management industry is likely to occur given that they will need to modernize standard industry practices.

2. Impose further restrictions on the sale and use: This option would involve removing rodenticides from the shelves of retail stores and require the development of new professional standards in the professional application of these products. However, as the pest management industry is currently subject to little to no government oversight, the Ministry will need to establish new enforcement mechanisms.

3. Implement a complete ban with exemptions for certain uses: The use of rodenticides would be permitted only in situations where it is deemed essential for the purpose of wildlife or environmental conservation. This would require the pest management industry to argue the case for any requested exemptions, on a case by case basis.

RECOMMENDATIONS

Rodenticides are dangerous, ineffective and pose a risk to human health. Their permitted use is inconsistent with the obligations owed by the provincial government to protect its citizens and the environment from the harmful effects of pesticides. The B.C. Minister of Environment must take immediate action to eliminate the risk caused by the use of these products, and it is our recommendation that the Minister implement a province-wide ban.

A province-wide ban could be accomplished by either a) amending the Integrated Pest Management Regulation by establishing a new class of "Prohibited Pesticides," or, b) amending the Integrated Pest Management Act to prohibit the use and sale of rodenticides (see Appendix B).

Appendix A:

B.C. municipalities that have passed motions regarding rodenticides:

1. District of North Vancouver
2. District of Saanich
3. District of North Saanich
4. City of Colwood
5. City of Port Moody
6. District of Sooke
7. City of North Vancouver
8. City of Victoria
9. District of Oak Bay
10. City of New Westminster
11. City of West Vancouver
12. Town of View Royal
13. Township of Esquimalt
14. Town of Qualicum Beach
15. City of Richmond
16. District of Highlands
17. City of Salmon Arm
18. Islands Trust Council of BC

Appendix B:

OPTION A: MINISTER REGULATION ESTABLISHING NEW CLASS OF "PROHIBITED PESTICIDES"

1 Subsection 1 (1) of the Integrated Pest Management Regulation, B.C. Reg. 235/2015 is amended

(a) by adding the following definition:

"prohibited pesticide" means a pesticide described in section 2 (f) [classes of pesticides] and set out in Schedule 6; **and**

2 Section 2 is amended

(b) in subsections (b)(ii), (c)(ii) and (d)(i)(B) by adding "prohibited pesticides" after "permit-restricted pesticides",

(c) by adding the following subsection:

(f) prohibited pesticides, being those pesticides assigned to this class under section 43(3) [classification of pesticides] because the administrator determines that prohibiting the use, purchase and sale of these pesticides is necessary and required to avoid unreasonable adverse effects caused by their use.

3 Section 43 is amended

(c) by adding the following subsection:

(3) The pesticides set out in Schedule 6 are classified as prohibited pesticides.

4 The Regulation is amended

(d) by adding the following Schedule:

Schedule 6

[am. B.C. Reg. 234/2015, s. X]

Prohibited Pesticides

- 1 brodifacoum
- 2 bromadiolone
- 3 chlorophacinone
- 4 difethialone
- 5 diphacinone
- 6 warfarin
- 7 bromethalin

OPTION B: BILL TO AMEND INTEGRATED PEST MANAGEMENT ACT

An Act to amend the Integrated Pest Management Act to prohibit the use and sale of rodenticides

HER MAJESTY, by and with the advice and consent of the Legislative Assembly of the Province of British Columbia, enacts as follows:

1 Section 1 of the Integrated Pest Management Act, S.B.C. 2003, c. 58 is amended

(a) by adding the following definition:

“Rodenticide” means

(a) any substance intended to destroy, repel or mitigate rodents and other pests by any method including by preventing normal blood clotting, by causing internal hemorrhaging, or by disturbing nervous system functions.

(b) a substance that is classified as a rodenticide by regulation.

“Humane” means actions that promote good welfare and minimize suffering.

2 Section 3 is amended

(b) by removing “General” in the title,

(c) in subsection (1)(a) by adding “inhumane” after “unreasonable”,

(d) by adding the following subsection:

(d) use, handle, release, transport, store, dispose a rodenticide containing any of the following rodenticide active ingredients, including:

- (a) brodifacoum;
- (b) bromadiolone;
- (c) chlorophacinone;
- (d) difethialone;
- (e) bromethalin;
- (f) diphacinone; or
- (g) warfarin