



1910 Saskatchewan Avenue W.  
Portage la Prairie, MB R1N 0P1  
Ph: 204-857-8666  
Email: [amm@amm.mb.ca](mailto:amm@amm.mb.ca)  
[www.amm.mb.ca](http://www.amm.mb.ca)

October 5, 2022

Standing Committee on Agriculture and Food  
Legislative Assembly of Manitoba  
Room 251, 450 Broadway  
Winnipeg, MB R3C 0V8  
Via email: [committees@leg.gov.mb.ca](mailto:committees@leg.gov.mb.ca)

To Whom it May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), I am writing to provide some comments regarding *Bill 22: The Environment Act (Pesticide Restrictions)*.

Firstly, the AMM wishes to thank Minister Jeff Wharton and the Province of Manitoba for introducing amendments to the *Environment Act* to give Manitobans, including municipalities, greater flexibility to use federally approved weed control products. The AMM also wishes to thank the Department of Environment, Climate and Parks for working in partnership with our organization and members on the development of Bill 22 draft definitions for new sensitive areas.

Manitoba's 137 municipalities, including the City of Winnipeg, have been negatively affected by *The Non-Essential Pesticide Use Regulation*. Since 2015, the AMM has called on the Province of Manitoba to reverse the ban on federally approved weed control products since *The Non-Essential Pesticide Use Regulation* increased costs tenfold for some municipalities that were forced to use alternative products which proved ineffective. For example, the City of Steinbach has estimated that the costs associated with its weed control program have risen more than tenfold while using alternative products such as Fiesta. In effect, local Councils are forced to decide whether to increase their weed control budgets or to cease weed control activities all together in certain areas of their municipalities due to the financial constraints caused by this regulation.

In addition, the AMM has expressed its confidence in current federal regulations regarding the approval of pesticides, as the review process undertaken by Health Canada's regulatory agency is rigorous and encompasses public safety review mechanisms. Banning cosmetic pesticides approved by federal government agencies not only reduces the ability of municipalities to effectively manage weed control programs, but also results in unnecessary financial constraints on municipal budgets. Moreover, aligning with federal regulations will allow municipalities to effectively manage weed control programs while mitigating financial pressures on municipal budgets. As municipalities continue to deal with both inflationary pressures and pandemic related financial pressures, the legislative amendments will help provide relief to local communities.



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While we are in support of the proposed amendments, it is vital that Department of Environment, Climate and Parks develop informational materials that clearly outline where and how federally-approved products can be used. While Bill 22 restricts the use of cosmetic pesticides in municipal playgrounds, picnic areas and dog parks, some municipalities have schools and playgrounds next to municipal recreation centers or share property lines. For these unique circumstances, it is critical that forthcoming resources highlight where cosmetic pesticide use is allowed and that environment officers are aware of these parameters to ensure consistency across the province. Moreover, as the next general election takes place on October 26, 2022, the AMM suggests that the Department of Environment, Climate and Parks work with our organization to enhance communication among newly and returning elected officials regarding these new legislative amendments.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Denys Volkov", written over a horizontal line.

Denys Volkov  
Executive Director

cc: Jeff Wharton Minister, Manitoba Environment, Climate and Parks  
Bruce Gray Deputy Minister, Manitoba Municipal Relations