

We appreciate your on-going commitment to the health of Canadians and their environment and encourage your vigilance in respect of this important phase of CEPA 99 implementation. The PCPA was passed in 1969. Since then, we have learned a lot about pesticides, for example, endocrine disruption, the special vulnerability of children and wildlife and the consequences of bioaccumulation in the North.

Pesticide management in Canada is long overdue for a major overhaul, led by a renewed, publicly supported PCPA. It is our hope that new pest control legislation will remedy the failings enumerated in this Notice of Objection. Until that time, we strongly believe that the PCPA should not be judged as CEPA-equivalent.

Thank you, in advance, for your prompt attention to this matter.

Yours truly,



Paul Muldoon
Executive Director and Counsel
Canadian Environmental
Law Association



Arlin Hackman
Vice-President, Conservation
World Wildlife Fund Canada



Theresa McClenaghan
Counsel
Canadian Environmental
Law Association

c.c. Hon. Allan Rock, P.C., M.P., Minister of Health
Cynthia Wright, Director General, Strategic Priorities Directorate
Environmental Protection Service, Environment Canada
Arthur Sheffield, Team Leader, Regulatory and Economic Analysis Branch
Policy & Communications, Environment Canada