

1. INTRODUCTION

The Ministry of Environment and Climate Change Strategy is proposing changes to the Integrated Pest Management Regulation to address risks to wildlife from the use of second-generation anticoagulant rodenticides (SGARs). The proposed changes aim to minimize the unnecessary use of SGARs to reduce accidental exposure to wildlife.

This Intentions Paper considers a science review, regulatory gap analysis and a jurisdictional scan of how SGARs are regulated internationally.

The scope of the proposed regulatory changes is limited to the use and sale of SGARs, with some administrative items (e.g., administrative penalty structure, clarifying the regulation of adjuvants, definition of licence year). Instructions on how to provide comments are provided at the end of this paper.

2. REASONS FOR PROPOSED CHANGES

Rodents, including rats and mice, cause significant economic losses and pose safety risks if their populations are not managed. It is estimated that between one-fifth to one-third of the world's food supply is lost to rodents. They also may carry diseases and damage electrical systems, which may cause disruption in critical infrastructure or create fires.

A variety of methods exist to control rodents, including pesticides. Rodenticides are pesticides used to control rats and mice, and anticoagulant rodenticides are the most used. SGARs are the preferred pesticide product choice by most pest management professionals. SGARs are defined as pesticide products registered under the federal *Pest Control Products Act* that contain the active ingredients: brodifacoum, bromadiolone or difethialone.

Due to their ease of use and effectiveness, SGARs have become normalized for rodent management across many sectors (e.g., agriculture, pest management industry, residential).

Even though SGARs are typically applied as bait in enclosed stations, primary poisoning may also occur if wildlife are able to access and feed directly on the bait. Secondary poisoning occurs when predators and scavengers consume rats, which have ingested SGARs. These products accumulate in the body and build up to a level that may be fatal. SGAR residues have been detected and identified as a cause of death in B.C. wildlife, particularly in raptors.

3. CURRENT REGULATION OF SGARS IN B.C.

Pesticides are jointly regulated federally and provincially. Before pesticides may be sold in Canada, they must be approved by Health Canada's Pest Management Regulatory Agency (PMRA), which evaluates pesticide products and establishes general use conditions on pesticide labels. The PMRA conducts rigorous scientific risk assessments for all pesticides registered for sale in Canada and reevaluates them every 15 years to ensure modern safety standards are met.

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In 2010, following re-evaluation of SGARs, the PMRA imposed new measures to reduce risk to non-target wildlife species. This included removing domestic SGARs from the marketplace, and restricting the use of commercial SGARs to certified pesticide applicators, farmers and government-approved pest control programs. The PMRA is set to re-evaluate SGARs in 2022 to determine whether they continue to meet current health and environmental risk assessment standards.

The Province of B.C. further regulates the sale and use of pesticides under the *Integrated Pest Management Act* and Regulation, administered by the ministry. The regulation includes additional requirements for using, storing and managing pesticide use in an environmentally sound manner. An authorization is required to sell or use SGARs on public land, in multi-residence buildings or as a service. Authorization holders are also required to be certified, which includes passing an exam. Those regulated in the use of SGARs include vendors, pest control companies, municipalities, golf courses/landscapers, utilities, oil and gas, forestry and highways.

4. KEY POLICY CONCEPTS

Good rodent management relies on a combination of approaches such as prevention, exclusion, trapping and potentially the responsible use of rodenticides. The ministry recognizes that solely relying on direct SGAR baiting as normal practice is not effective rodent management. Alternative control measures must be considered to resolve rodent infestations over the long term. Integrated Pest Management (IPM) is crucial for proper rodent management, with prevention being the most effective long-term rodent infestation measure. Limiting SGAR use and ensuring authorized users are practicing IPM principles minimizes unintended effects on non-target wildlife.

This Intentions Paper has been developed to:

- Reduce exposure to non-target wildlife by limiting use of SGARs;
- Increase adoption of Integrated Pest Management and ensure site specific assessments are conducted;
- Encourage the use of alternative control methods and lower-risk rodenticides;
- Avoid the continuous use of SGARs;
- Restrict access of SGARs to authorized users;
- Increase the level of knowledge of risks and best practices for SGAR use; and
- Increase ministry oversight in how SGARs are used.

5. PROPOSED CHANGES TO THE IPM REGULATION

5.1 Prohibit all public and most commercial use of SGARs in B.C.

The abundant use of SGARs to control rodents has led to an unacceptable level of non-target wildlife poisonings. The proposed changes aim to broadly reduce access to SGARs **to** reduce overall exposure of wildlife to these products. The ministry is proposing to prohibit the access to and use of SGARs in B.C. for all members of the public, and **most** commercial and industrial users; some uses would still be permitted for certain **essential** services as described below.

The proposed changes include:

- **Prohibiting access and use of SGARs in B.C. to the public, and most commercial and industrial operations.**

5.2 Exempt essential services, including agriculture, from the prohibition on using SGARs

Despite the provincewide ban of SGARs in B.C., the ministry recognizes that SGAR use may be required in certain situations to maintain continued operation of essential services. SGARs would still be allowed to be used for these purposes to balance the need to protect wildlife with science-based decisions, while protecting the delivery of essential services. SGARs may only be accessed and used by those performing essential services, including agricultural operators. Agricultural operator has the same meaning as agricultural operator as defined under the [Code of Practice for Agricultural Environmental Management](#).

Essential service exemptions from the SGAR ban were initially identified by assessing the services listed as [Essential Services in B.C. during the COVID-19 pandemic](#). This broad list served as the starting point for a listing of essential services for use of SGARs. The list was further refined by assessing which of them may rely on rodent control to maintain critical services (i.e., negatively affected by restricting the use of SGARs). This included considering human health, environmental protection, and ensuring the stable supply of necessary items such as electricity, fuel and food. The following list is the proposed essential services that would be exempt from the ban on using SGARs. See Appendix 1 for details.

Essential services for the use of SGARs:

1. Health and Health Services
2. Public Safety
3. Critical Infrastructure
4. Food Supply and Agricultural Production
5. Transportation
6. Sanitation
7. Communications
8. Coroners and those Performing Mortuary Services
9. Environmental Protection Activities

Feedback requested on the listing of essential services listed in Appendix 1:

The ministry is interested in hearing feedback on whether the proposed exemption list from the SGAR ban in B.C. should be refined.

The proposed change includes:

- **Restricting the use of SGARs to essential services as listed in Appendix 1, including agriculture.**

5.3 Require the use of Integrated Pest Management for all SGAR use

Integrated Pest Management (IPM) is a science-based decision-making system that focuses on strategies to minimize unnecessary pesticide use. In B.C., most pesticides must be used as part of an IPM program, with a focus on long-term solutions and an emphasis on prevention. If these prevention measures are not sufficient, control measures (i.e., rodenticides and pesticide alternatives) may be warranted to reduce pest populations to acceptable levels.

There is significant variation in the level of IPM adoption when managing rodents. Enhanced IPM requirements would be placed on all IPM practitioners who plan on using SGARs. Rodent control programs would be required to move away from baiting techniques that rely on SGARs without consideration of practical alternatives and preventative measures.

Preventative baiting is when SGARs are placed in bait stations where there are no active signs of rodent infestation. It can result in wasted bait and increases the risk of non-target exposure. No preventative baiting using SGARs would be allowed and SGAR use would only be permitted when there is direct evidence of a rodent infestation. IPM practitioners who plan on using SGARs would need to document and demonstrate rodent activity to justify SGAR use.

IPM for rodent management includes identifying the species of rodent and understanding their behaviours, monitoring population levels, removing sources of food and shelter, preventing access to important structures, incorporating a variety of control options (including physical trapping) and evaluating effectiveness of the treatment. These actions are important for each location where rodents are being managed. As such, IPM practitioners who plan on using SGARs would be required to develop and follow an IPM plan for each location they are using SGARs. These plans would be provided to ministry inspectors upon request.

Effective IPM programs rely on evaluation and good record keeping. Due to the risks these products present, the ministry expects a high level of due diligence when considering SGARs use. IPM practitioners who plan on using SGARs would be required to demonstrate their efforts in prevention and collaborate with ministry inspectors to verify IPM adoption. Rodents may continue to access a site if prevention measures are not implemented, which can make SGAR baiting ineffective. IPM practitioners who plan on using SGARs would have to document prevention measures that have been attempted prior to deploying SGARs. They would also be required to record when the SGAR bait was initially deployed and removed to ensure they are adhering to approved baiting periods described in section 5.6, and to assist with verification by inspectors.

Given the variety of methods available for rodent control and the desire to shift away from over-reliance of SGAR use, the ministry proposes that other non-chemical or physical controls be used preceding SGAR use. Examples of these could include rodent snap traps, multiple catch traps or self-resetting traps. Additional control options, such as rodent contraceptives, may be registered soon in Canada. The use of a variety of control measures would also help lessen the chances of rodent populations developing a resistance to a particular rodenticide.

The proposed changes include:

- **Prohibiting preventative baiting.**
- **Creating and implementing a site-specific Integrated Pest Management plan when using SGARs.**
- **Implementing and documenting prevention measures prior to SGAR use.**
- **Recording when SGARs are deployed and removed.**
- **Requiring other non-chemical/physical controls to be used preceding or following SGAR use.**

5.4 Require certification for all SGAR use by essential services, including agriculture

Proper knowledge and training is crucial when using SGARs to control rodents, and protect human health and the environment. Currently, pesticide applicator certification is required when purchasing or using higher-risk pesticides, using a pesticide with a label that states certification is required and using pesticides for an authorization holder.

Certification ensures that individuals have the basic knowledge required to treat rodent infestations effectively and safely. To apply SGARs, the ministry is proposing that all IPM practitioners must hold pesticide applicator certification in the appropriate category. Appropriate certificate categories to apply SGARs include: Structural – integrated pest management; Agriculture – general; and Agriculture – rodent management. The ministry has also created a more robust certification system by improving the training material and exam process. This ensures applicators are knowledgeable about risks and best practices when using SGARs.

The proposed change includes:

- **Requiring all essential services, including agriculture, to hold pesticide applicator certification for SGAR use.**

5.5 *Require an authorization for all essential services, including agriculture, when using SGARs*

Greater oversight is needed in how SGARs are used. The ministry proposes that all SGAR use for essential services require a licence issued under the *Integrated Pest Management Act*. Essential services would be able to hold a licence themselves to apply SGARs or hire a licensed service company to apply SGARs on their behalf. Licence holders regulated under the act are required to adopt Integrated Pest Management when considering pesticide use to control pests (further information is described in section 5.3). More information about pesticide licence requirements can be found in the [IPMA and Regulation Summary](#).

The ministry is also concerned with the sale of SGARs through online retailers, as these vendors may not be fully aware of the requirements to sell or use these products. As such, licensees that have used SGARs would indicate to the ministry whether they have purchased these SGARs online.

General Licence Requirements:

- Annual fee of \$250 per year for pesticide application up to 50 hectares (fee schedule is established in regulation).
- Keep daily use records.
- Submit an annual report of pesticide use to ministry.
- Follow and implement IPM principles.

The proposed changes include:

- **Requiring all essential services using SGARs to be licensed.**
- **Requiring all licensees that have used SGARs to indicate whether they have purchased SGARs online.**

5.6 *Prohibit long-term SGAR use*

The ministry is proposing to reduce and transition away from SGAR use as a routine and continual practice. Continuous long-term baiting practices increases the risk of unintentional wildlife poisonings. Within an IPM program, a significant rodent population reduction using SGARs can often be achieved within a period of 35 days. Following this short-term reduction, the focus should shift to preventing further infestations and managing infestations with alternative control measures.

There are rare instances of severe rodent infestation where essential services may need to conduct SGAR baiting several times within one year to achieve significant population reduction. As such, short-term baiting would be permitted a limited number of times within a year, but long-term continuous SGAR baiting would no longer be permitted. Long-term baiting is defined as baiting that lasts longer than 35 consecutive days or baiting exceeding a total of 120 days within a 12-month period, per site. SGAR baiting that is under this threshold is considered short-term baiting. Authorized users would now only be able to apply SGARs for short-term use and within an IPM approach.

Feedback requested on prohibiting long-term use of SGARs:

The ministry is interested in hearing feedback on how limiting SGAR use to short-term application within an IPM approach may affect essential service operations.

The proposed change includes:

- **Prohibiting long-term SGAR baiting scenarios and only allowing short-term SGAR baiting.**

5.7 Prohibiting use of SGARs in critical wildlife habitat

Certain habitats in B.C. are critical to wildlife protection. To avoid potential exposure of SGARs to wildlife in these areas, SGARs would be banned in these sensitive habitats due to a greater likelihood of significant impacts to wildlife. IPM practitioners would not be able to deploy SGARSs in these critical wildlife habitats.

Critical wildlife habitat is defined as the following:

- A wildlife sanctuary;
- An ecological reserve;
- A bird sanctuary; or
- Other established wildlife protection areas.

There are biodiversity protection programs that rely on rodenticides as part of their efforts to protect wildlife in ecologically sensitive areas. For example, Parks Canada staff use SGARs to protect native wildlife on Haida Gwaii where rats have been linked to multiple sea bird colony declines. Official conservation programs managed by government personnel would be exempt from this restriction, but use is subject to the new requirements for licensees described above.

Feedback requested regarding the definition of critical wildlife habitat:

The ministry is interested in hearing feedback on the types of habitats that are crucial to raptors or sensitive wildlife to designate areas where use of SGARs is prohibited.

The proposed changes include:

- **Prohibiting SGAR use within any critical wildlife habitat.**
- **Providing an exemption for authorized government-approved conservation projects.**

5.8 Disposal and notification of SGARs

Effective environmental sanitation where bait is deployed can lower the chance of SGARs accumulating in the environment. Since wildlife may visit areas where rodent infestations are active, promptly disposing of dead rodents can significantly reduce the chance of scavengers consuming poisoned rodents. Proper handling of expired SGAR baits can also help reduce these substances from unintentionally entering the environment. The ministry is proposing that reasonable effort be made to clean up waste bait, spillage and dead rodents during every visit. In addition, unusable SGAR baits would be disposed of properly at an approved facility that is able to process these wastes.

Clear notification of when SGARs are used in bait stations is important to raise public awareness of pesticide use. Sometimes, non-pesticide options such as snap traps are placed in bait boxes and boxes do not contain any pesticide. Accurate notification of SGAR use on the outside of bait boxes assists with verification of requirements placed on licensees, and avoids wasted ministry resources responding to unnecessary complaints of non-compliance. Licensees would be required to label the outside of bait boxes with accurate information regarding the contents of the bait box.

The proposed changes include:

- **Timely clean up of waste bait and dead rodents.**
- **Properly disposing of expired or end-of-life SGARs at an approved facility.**
- **Affixing bait box labels to the outside of the bait box to accurately identify the contents of the box.**

5.9 Enhancing requirements for SGAR sale

As discussed above, only certified pesticide applicators who are licenced would have access to purchase SGARs to address rodent infestations at locations of essential services within an IPM approach. The proposed changes require vendors to only sell SGARs to authorized licensed service providers, and enhances the current requirements for vendors selling pesticides to customers. This would also apply to online retailers selling SGARs to end users in British Columbia.

SGARs would be displayed in a manner that restricts customer access. For example, pesticides could be displayed behind a counter or in a locked cabinet. A customer would not be able to access the pesticide without assistance from a certified dispenser. A sign produced by the ministry indicating risks to wildlife from SGAR use would be posted where SGARs are displayed for sale.

Pesticide vendors selling SGARs would verify that purchasers a) hold a pesticide applicator certificate; b) hold a licence; and c) are an essential service or licensed service provider. These requirements would be completed by a certified pesticide dispenser. Pesticide dispensers employed under a pesticide vendor would refuse sale of SGARs in all other instances.

The ministry is also proposing to enhance the customer interaction that staff dispensing pesticides for pesticide vendors must currently perform. Prior to each SGAR sale, dispensers would inform customers that SGARs present a risk to wildlife and other non-target animals. For example, dispensers could inform customers that wildlife could be poisoned if they consume a rodent which has eaten SGARs. Further, dispensers would communicate that IPM principles must be followed before using SGARs, and that disposal and record keeping requirements also apply. Certified dispensers would not be expected to inform authorized purchasers of the specific requirements, only to inform customers that these new requirements exist.

There would also be enhanced record keeping for pesticide vendors when selling SGARs, which would build upon the record-keeping requirements already required under the regulation. These new requirements relate to the sale of the SGAR product and the purchaser's information, including: the date of sale; contact information of the purchaser; product registration number and type; purchaser's certificate and licence number; purchaser's category of essential service; and the dispenser's name and certificate number. These improvements would help verify compliance.

The proposed changes include:

- **Restricted access to and posting ministry signage where SGAR products are sold.**
- **Requiring pesticide vendors selling SGARs to verify that purchasers hold a certificate in the appropriate category, hold a licence, and are an essential service or licensed service provider.**
- **Requiring dispensers to inform customers of the risks to wildlife from SGAR use, and about the new requirements for IPM, disposal and record keeping prior to each SGAR sale.**
- **Pesticide vendors keep additional records relating to the sale of SGARs.**

5.10 Summary of major proposed changes to the Integrated Pest Management Regulation

As discussed in the sections above, the ministry is actively transitioning those managing rodents away from SGAR use as a routine practice, and ensuring individuals are practicing good rodent management using Integrated Pest Management (IPM). The following provides a summary of the major proposed regulatory changes to manage rodents with SGARs. To access and use SGARs, individuals would be performing an essential service and practicing IPM, with an emphasis on prevention. Individuals would also hold a pesticide certificate and licence, and provide these before purchasing SGARs. SGARs would only be used in limited scenarios for short-term use, and be used in combination with other rodent control practices such as trapping.

Figure 1: Proposed major requirements that must be met to use SGARs.



Key Points

- Prohibit public and most commercial use of SGARs.
- Restrict SGAR use to only those performing essential services.
- Require adoption of Integrated Pest Management (IPM), focusing on prevention and normalizing the use of alternative controls techniques.
- Require implementation of an IPM plan for each site where SGARs are used.
- Require IPM practitioners who plan on using SGARs to be certified to increase their level of knowledge.
- Require a pesticide licence when SGARs are used to increase ministry oversight in these products.
- Prohibit long-term baiting with SGARs and only allow short-term baiting as part of an IPM approach.
- Prohibit use of SGARs within critical wildlife habitat.
- Restrict access of SGARs to authorized users through enhanced requirements for SGAR sale.

5.11 Administrative amendment – Updating the Administrative Penalties Regulation

Administrative penalties are financial penalties imposed on a person or a business for non-compliance with a regulatory requirement. These penalties are already in place for current requirements in the regulation under the Administrative Penalties (*Integrated Pest Management Act*) Regulation. However, slight changes to the Administrative Penalties Regulation may be required based on the final policy direction from this Intentions Paper. These changes would ensure the Administrative Penalties Regulation continues to be up-to-date and effective (i.e. able to address non-compliance with requirements). No substantive changes to the administrative penalties structure or process are anticipated based on the proposal described in this paper.

The proposed change includes:

- **Updating the Administrative Penalties (*Integrated Pest Management Act*) Regulation to maintain the current structure for issuing administrative penalties in response to non-compliance, as needed.**

5.12 Administrative amendment – Pesticide drift restriction

Regulation of pesticide drift falls under the [Code of Practice for Agricultural Environmental Management](#), a minister's regulation under the *Environmental Management Act*. Under section 77.1 of the code of practice, agricultural operators must ensure that pesticide drift or runoff does not enter a watercourse or cross a property boundary, and they must keep pesticide application records.

The proposed change would simply transfer these requirements into the Integrated Pest Management Regulation, meeting previous ministry commitments to include pesticide protection requirements in the regulation. This proposal would not change the current requirements on agricultural operators for preventing pesticide drift; only the regulatory location where this requirement is housed.

The proposed change includes:

- **Transferring section 77.1 of Code of Practice for Agricultural Environmental Management (Adverse effects of pesticide application) into the Integrated Pest Management Regulation.**

5.13 Administrative amendment – Clarifying the regulation of adjuvants

Adjuvants are substances added by the applicator as a tank mix with the pesticide to improve the efficacy of the pesticide formulation. Examples can include dyes, antifoam agents and surfactants. Surfactants are currently excluded from regulation as pesticides in the Integrated Pest Management Regulation but other adjuvants are not.

There is variation in understanding regarding what constitutes a pesticide under the regulation and this confusion has led to challenges for regulated parties. The ministry wishes to clarify that the adjuvant products were not intended to be regulated as a pesticide under the regulation.

The proposed change includes:

- **Clarifying that adjuvants are not considered pesticides under the Integrated Pest Management Regulation.**

5.14 Administrative amendment – Adjusting the definition of “licence year”

Licences issued under the *Integrated Pest Management Act* typically have a one-year term that is defined in the regulation. Under section 13 of the regulation, a “licence year” means the period from the date a licence is issued until March 31 in the next calendar year. This definition creates a bottleneck for those applying and those processing licences, which results in unnecessary delays.

The ministry is seeking to adjust the definition of “licence year” to spread out applications and reduce administrative processing timelines. The ministry proposes to adjust the current definition to be one year from the date when the licence was issued.

The proposed change includes:

- **Adjusting the definition of “licence year” to be one year from when the licence was issued.**

6. ASSURING COMPLIANCE

Ministry inspectors follow established [Compliance Management Framework](#) and [Compliance and Enforcement Policy and Procedure](#) when addressing compliance with acts and regulations under its mandate. The ministry aims to set regulatory requirements that are clear, practical, achievable and enforceable to encourage the support and compliance of individuals and businesses. Assessing compliance involves monitoring and verification, assessment of risks and hazards posed by non-compliance, and the specifics of each situation (e.g., history of compliance or non-compliance).

A range of tools are available to respond to non-compliance – from advisories and warnings to orders, tickets and administrative monetary penalties to prosecutions. Decisions on which tool or tools to use are made using a matrix based on factors such as the significance of the impact to the environment and human health, noncompliance history, the willingness of the individual to share information and respond, and their due diligence in responding to the event.

Working with agricultural organizations, the pest management industry and other sectors on education and awareness will help ensure IPM practitioners and vendors are aware of and understand the requirements for protection of the environment and human health.

7. NEXT STEPS

Comments on the proposed revisions will be received until June 19, 2022, and will be carefully considered in updating the Integrated Pest Management Regulation. The ministry will confirm the final direction for amending the regulation in summer 2022, following a thorough review of feedback. To assist those affected by the proposed changes, the ministry intends to publish a series of guidance documents and engage stakeholders in a series of outreach activities.

8. PROVIDING FEEDBACK

The ministry welcomes comments on the proposals outlined in this Intentions Paper, and has prepared a response form based on the proposed revisions. The response form can be accessed from the ministry’s IPM website [here](#). This is the preferred route to submit comments. However, if this is not feasible, comments can be provided by email attachment or by mail (addresses listed below).

Collection Notice: Your personal information is collected under section 26(c) and 26(e) of the *Freedom of Information and Protection of Privacy Act* for the purposes of receiving feedback from stakeholders regarding the Intentions Paper. All submissions will be reviewed for inclusion without attribution in a consultation summary report to be made public following the consultation period.

If you have any questions about the collection of your information, please contact program area staff at IPMProgram@gov.bc.ca.

Please send all submissions, questions or comments regarding this information or the ministry's schedule for the engagement process, to the following:

Email: IPMProgram@gov.bc.ca

Mail: Ministry of Environment and Climate Change Strategy
Integrated Pest Management Team
Environmental Standards Branch
PO Box 9341 Stn Prov Govt
Victoria BC V8M 9M1
Attn: IPMR Review

Comments to the ministry are welcomed on or before June 19, 2022.

Thank you for your time and comments!

APPENDIX 1: Listing of essential services for use of SGARs in an IPM approach

Businesses and persons that provide:

1. Health and Health Services

- a. Hospitals, emergency care services, primary care facilities (assisted living, day surgeries).
- b. Supportive housing & services (social housing, shelters, safe use injection sites).

2. Public Safety

- a. Department of National Defense facilities, Canadian Armed Forces facilities, and operations and services that support the Canadian Coast Guard and Coast Guard Auxiliary.
- b. Emergency management facilities at local, regional, provincial and federal levels.
- c. Emergency response service (police, fire stations, ambulance, 911 dispatch).

3. Critical Infrastructure

- a. Drilling and production, refineries, processing, treatment and completion facilities, storage, distribution network infrastructure in maintaining electricity, drinking water, wastewater, oil and natural and propane gas, fuel, petroleum, crude oil and other fuel sources such as heating oil.

4. Food Supply and Agricultural Production

- a. Agricultural operations.
- b. Food processing, manufacturing, storage, transportation (grain, rail) of foods, feed products.
- c. Restaurants and other commercial facilities that prepare and serve food.
- d. Retail – grocery stores, convenience stores, food banks and other establishments engaged in the retail sale or provision of food. Does not include beverages, pet food, cannabis, liquor, and snack and vending machines.

5. Transportation

- a. Commercial port/waterfront operations, air and rail operations.

6. Sanitation

- a. Waste (garbage and organics) and recycling processing (transfer stations, recycling facilities) and disposal (landfills, waste-energy facilities). Does not include residential/commercial collection areas.

7. Communications

- a. Radio, cable providers and telecommunications services, including phone, internet, wireless communications, satellite operations, undersea cable landing stations and Internet Exchange Points. Excludes office space and call centres.

8. Coroners and those Performing Mortuary Services

- a. Coroners and facilities performing mortuary services, including funeral homes, crematoriums and cemeteries.
- b. Services directly involved in storage, transportation, and certification of human remains.
- c. Forensic services.

9. Government-Approved Environmental Protection Activities

- a. Island conservation programs, including the eradication of non-native invasive species inhabiting or found to be present on offshore islands.
- b. Biodiversity programs led by government.