

From: NoSpray_kcsa@proton.me
To: Rick.G.Manwaring@gov.bc.ca
Cc: [Board of Education](#); [C C](#); [Call To Action Cranbrook](#); chair@rdco.com; chodge@kelowna.ca; clderrickson@wfn.ca; dan.albas@parl.gc.ca; FOR.Minister@gov.bc.ca; [Funk, Tyson](#); gord.milsom@westkelownacity.ca; ireland@lakecountry.bc.ca; [James Shannon](#); jcoble@wfn.ca; kevin.kraft@rdco.com; lwooldridge@kelowna.ca; mayorandcouncil@westkelownacity.ca; mayorvanminsel@peachland.ca; Premier@gov.bc.ca; rcannan@kelowna.ca; rlouie@wfn.ca; tdyas@kelowna.ca; [Wayne Broughton](#); wayne.carson@rdco.com
Subject: Unknown ingredients in Foray 48B
Date: Monday, May 6, 2024 11:41:52 AM

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May 6, 2024

Rick Manwaring

Deputy Minister of Forests
PO Box 9352 Stn. Prov Govt
Victoria, BC V8W 9M1

Dear Deputy Minister Manwaring,

I hope this letter finds you well. Enclosed, you will find a copy of our correspondence addressed to Mr. Ebata dated April 15, 2024, regarding our concerns over the proposed aerial bacterial pesticide spraying in West Kelowna. Regrettably, Mr. Ebata has refrained from responding to our inquiries, citing that the permit is under appeal.

As you know, the Environmental Appeal Board is considering a Stay of the pesticide application this week while spraying continues. Should the Board rule against the Stay application the WKB/KCSA expects as you have done in the past to seek to have the appeals dismissed as being Moot given the aerial applications will have been completed. This does not negate your responsibility to ensure the safety of all citizens, animals and non-target species within the 13 communities being aeri ally sprayed.

One of the pressing concerns highlighted in Mr. Ebata's response was the comparison of the "other ingredients" in the pesticide to common household cleaners. While such a comparison may seek to reassure the public, it raises significant questions regarding the toxicity and safety of these undisclosed ingredients. As you are likely aware, many household cleaners carry clear warnings due to their toxic nature. How can Mr. Ebata's comparisons instill public confidence when 87% of these "other ingredients" remain unidentified, potentially hazardous, and are a major part of the residues that are toxic and continue to be toxic as they breakdown. To our knowledge you have not tested these bacterial pesticide residues.

Furthermore, it has come to our attention that this pesticide product is not required to undergo testing for carcinogenic or mutagenic properties, nor is it immune from contamination. Given these circumstances, how can you assure the safety of vulnerable populations such as children, the elderly, and individuals with compromised immune systems? The lack of a rigorous and scientific collection of data on the long-term effects of exposure and environmental fate impacts is lacking. This is especially true given your Ministry's statement that the bacterial pesticide will collapse butterfly populations for several years. This aspect alone raises serious

doubts about the safety of this aerially applied bacterial pesticide.

Following application, your Ministry indicates the pesticide takes 10 minutes to reach the ground. This residue is sticky, and adheres to all exposed surfaces and can be drawn into air conditioning systems, deposit on and in vehicles, and be tracked into government and public buildings. This poses ongoing exposure risks to all segments of the population. Pets will also be affected.

What specific tests has the Ministry conducted to assess the toxicity and breakdown metabolites of these residues? Please inform WorkSafe BC or your results. Our organization contends that inadequate research has been conducted on the potential long-term toxicity and resultant exposure levels, particularly concerning school children who will come into direct contact with contaminated surfaces when attending schools on Spray Days!

In the event of pre-spray contamination, how does the Ministry intend to address potential health effects resulting from exposure? These are critical questions that demand transparent and comprehensive answers to ensure public safety and well-being.

We urge your immediate attention to this matter and respectfully request a thorough response to our concerns. The health and safety of our communities, particularly our most vulnerable members, depends on your Ministry's commitment to transparency and rigorous safety protocols, including following the WorkSafe BC regulations regarding pesticide use in the workplace. You have been sent the complaint the WKB/KCSA has filed with WorkSafe BC.

We encourage your prompt attention to this urgent matter. Your response is required given your Ministry's intent to continue spraying a bacterial pesticide on unknowing citizens and workers in 13 provincial communities.

Sincerely,

On behalf of the West Kelowna Branch of the Kelowna Citizens Safety Association

Lloyd Manchester
President
250-878-9352
Nospray_kcsa@proton.me

Letter to Ministry of Forest employee Mr. Ebata
April 15, 2024

Dear Mr. Ebata,

I am writing on behalf of the West Kelowna Branch of the Kelowna Citizens Safety Association (WKB) regarding your response to several questions the Cranbrook Call to Action group asked you and that you responded to on April 4th, 2024. I am writing with respect to the 87% of the other ingredients in the Foray 48B formulation and your statements that the PMRS considers them inert (no toxicity).

I am sure that you are aware that that claim was made with the full formulation of glyphosate (Roundup). It became clear that the so called Inert ingredients were not inert and in fact were part of the increased toxicity of the full formulation. It was considered safe and effective yet today it is known for causing harm to people and residues of this product are in the world.

In your April 4th 2024 letter to the Cranbrook Call to Action group you answered the following question:

"Foray 48B composition information includes 12.65% BTK and 87.35% proprietary ingredients, meaning we do not know what the other ingredients are".

Your response stated that , "A large portion (~75%) of the proprietary ingredients is water.

Other ingredients are fermentation solids (grain is often used to ferment the bacteria), stabilizing agents used to maintain the pH and prevent contamination, stickers (to ensure the droplets stick onto the target foliage), feeding stimulants to encourage the caterpillars ingestion of the Btk, and UV protectants. All proprietary ingredients are considered very low toxicity or are described as inert ingredients by the Pest Management Regulatory Agency and the US Environmental Protection Agency meaning they have negligible impact on human health. These components are commonly found in household products used by everyone.

Also, all ingredients have been reviewed by OMRI Canada to assure organic farms that their certification will remain unchanged if exposed to this product. They concur that the product does not contain harmful ingredients."

The WKB has the following questions regarding your statement and how it pertains to the West Kelowna aerial pesticide application.

1. Is there more than one stabilizing agent to "maintain the PH and prevent contamination" within the formulation? What class of chemicals are these stabilizing agents from and what is the range of toxicities within this grouping?
2. What type of contamination are you trying to avoid and if contamination occurs what are the risks?
3. What is the full array of fermentation products that may be used to ferment the bacteria and how do you know that the bacteria is fully fermented prior to application?
4. When was the last time the full formulation of Foray 48B was tested?
5. What is the PH of the formulation prior to application?
6. What class of chemicals do the "stickers" come from and what is the range of toxicities within this grouping? Are these stickers considered surfactants and if not what surfactants do you think may be found in the full formulation?
7. In other formulations some surfactants are identified such as Sodium Gluconate or Sodium Citra Dihy. Do you know if these surfactants are present in the formulation or the classes of surfactants in the full formulation. Within this class of chemicals, what is the range of toxicity?
8. What class of chemicals are the "feeding stimulants" from and what is the range of toxicity within this group?
9. You state that the PRMA describes these ingredients as 'Inert'. Merriam Webster Dictionary defines Inert as "deficient in active properties, especially: lacking a usual or anticipated chemical or biological action." You state, " All proprietary ingredients are considered very low toxicity or are described as inert ingredients. Please explain how your statements that are supported by the definition of Inert?
10. You state, that these Inert ingredients, "have a negligible impact on human health. What do you consider negligible with respect to the health effects from Btk exposure to both

humans and pets?

11. How many Pesticide incident reports has the Ministry of Forests sent to the Manufacture in the last 10 years? Please explain why our Ministry of Health is not the first stage of reporting health effects from exposure?

12. You state that, "These components are commonly found in household products used by everyone". My understanding of household products is that they contain many different types of chemicals that are toxic and corrosive. Please explain what types of household cleaning products that you are speaking about that contain similar types of products used in the Foray 48B formulation.

13. You state that there are UV Protectants in the formulation. What class of chemicals are these from and what is the range of toxicity? Many UV protectants have been banned. over the years. Do any of these UV protectants contained banned substances?

In another Foray aqueous product the chemical H320 was included in the label precautions as part of the formulation. This chemical is an eye irritant and very toxic. Is this chemical potentially in the Foray 48 B solution? If not, what do you suspect is the eye irritant that is in the Foray 48B formulation?

14. Can you please provide and Foray 48B Residue (caked material) breakdown studies that would show the breakdown metabolites and their potential toxicities as they degrade. You mention there have been no health effects from exposure to caked residue. What studies have been done to establish this safety factor and where were they done?

15. You told me in a phone call that you were aware of Btk applicators that have contracted dermatitis. What in the formulation do you think is causing this type of Adverse reaction?

16. Can Foray 48B enter air conditioners and if so can it then pulled in and distributed with a dwelling, school or business? Are you recommending that air filters be changed after each application?

I look forward to your early response to our concerns regarding the aerial application of Foray 48B in West Kelowna.

Sincerely yours,

On behalf of the West Kelowna Branch of the Kelowna Citizens Safety Organization

Lloyd Manchester
President
250-878-9352

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