

May 6, 2015

David,

I apologize for the length of time in providing an update on this issue to you.

While I would like to see permethrin treated clothing available in Canada as an option for people, and I appreciate your passion on this issue, it is only one very small piece of preventing Lyme Disease. In the end, while good to have, permethrin treated clothing is not a necessity for Lyme Disease prevention.

I need to focus my attention on the strategic aspects across a whole range of public health issues. I have raised the issue with PHAC and Health Canada and need to leave it to them as it is within their regulatory mandate. I firmly believe that it will be consumer demand, and not advocacy from other levels of government, that creates action on this specific issue.

Sincerely,

Rob Strang

---

**From:** David Patriquin [mailto:davidgpatriquin@yahoo.ca]

**Sent:** May-05-15 6:44 PM

**To:** Strang, Robert; 'David Patriquin'

**Cc:** megan.leslie@parl.gc.ca

**Subject:** Re: Requesting update on use of Permethrin-treated clothing to prevent ticks/Lyme

Robert,

Thank you for the response.

I do have to wonder why health officials at provincial and federal levels are so passive on this issue. Why are you (they) not pressing US companies to sell products such as the Insect Shield clothing in Canada, given the benefits. The Europeans are pursuing the fabrics options quite aggressively. The lack of such initiatives feeds into the popular impression that the Lyme disease is not taken seriously by health officials.

Further, I do not totally accept the story that " Health Canada's perception was that the steps required to get a product licensed for sale in Canada were seen by manufacturer's as not worth the investment for the anticipated volume of sales in Canada... I think it would be appropriate to do some independent investigation of that claim and, regardless, to take steps to ensure such products are available in Canada.

For example, I was told by LL Bean that they would not ship Insect Shield products to Canada - can they be assured that they will not be subject to punitive actions if they do so ( re item # 9 at <http://www.phac-aspc.gc.ca/publicat/ccdr-rmtc/12vol38/acs-dcc-3/index-eng.php> ), and if that is sorted out, could you advise Nova Scotians about this option for increasing protection against Lyme-carrying ticks?

I greatly appreciate your further consideration of this issue.

-David Patriquin

---

**From:** "Strang, Robert" <[Robert.Strang@novascotia.ca](mailto:Robert.Strang@novascotia.ca)>  
**To:** 'David Patriquin' <[David.Patriquin@Dal.Ca](mailto:David.Patriquin@Dal.Ca)>  
**Cc:** "[megan.leslie@parl.gc.ca](mailto:megan.leslie@parl.gc.ca)" <[megan.leslie@parl.gc.ca](mailto:megan.leslie@parl.gc.ca)>  
**Sent:** Tuesday, May 5, 2015 2:35 PM  
**Subject:** RE: Requesting update on use of Permethrin-treated clothing to prevent ticks/Lyme

David,

Based on your information I did have a discussion with senior officials from PHAC and Health Canada last July 10<sup>th</sup>. At that time I was told that there was no policy against allowing permethrin treated clothes to be sold in Canada but rather that Health Canada had only received one submission for licensure from a manufacturer and that it had been sent back with a request for more data. The sense that I got is that Health Canada's perception was that the steps required to get a product licensed for sale in Canada were seen by manufacturer's as not worth the investment for the abticipated volume of sales in Canada. I was also told that PMRA was in the process of doing a general review of products containing permethrin as an active ingredient that are already on the market in Canada.

I have not heard anything more nor have I actively followed this up. I hope this information is helpful.

Rob

Dr. Robert Strang  
Chief Medical Officer of Health  
Department of Health and Wellness  
1894 Barrington Street  
3<sup>rd</sup> Floor Barrington Tower  
Scotia Square  
PO Box 488  
Halifax, NS  
B3J 2R8  
Phone (902) 424-2358  
Fax (902) 424-4716

---

**From:** David Patriquin [<mailto:David.Patriquin@Dal.Ca>]

**Sent:** May-05-15 1:24 PM

**To:** Strang, Robert

**Cc:** [megan.leslie@parl.gc.ca](mailto:megan.leslie@parl.gc.ca)

**Subject:** Requesting update on use of Permethrin-treated clothing to prevent ticks/Lyme

Dear Dr. Strang,

I wrote you just over a year ago to bring to your attention a significant, but-should-be-solvable barrier to Nova Scotians' abilities to protect themselves from Lyme disease: in Canada, we cannot purchase permethrin treated clothing (detailed in the letter, attached) and your reply is below.

Can you tell me if any progress has been made on this front?

I set up a petition and website related to this issue following my letter (<http://noticks.ca>) The Petition has garnered only about 140 signatures, but the 60 or so comments are very a propos.

I do not understand why this issue has so little traction in Canada. I have worked in several tropical countries where malaria occurs and see the Lyme issue - and other tick-borne diseases- as our temperate zone equivalent. Of course it is a recent one and we have grown up in an environment largely free of such threatening diseases spread by arthropods.

As well, based also on some responses to my efforts to promote the petition, I suspect there is a wariness amongst Haligonians in particular about pesticides and the thought of them on one's clothing seems to outweigh concern about Lyme disease. Interestingly enough, one such critic dresses to the hilt including netting over his face parts and gloves on his hands when he goes into Lyme territory, but no treated clothing!

As I point out on the noticks.ca web page, "I have been an outspoken critic about misuse of pyrethrins under pesticide by-laws and other legislation limiting cosmetic use of pesticides\* - so I am not readily disposed to the use of pyrethrin and pyrethroid pesticides more generally."

I view the use of permethrin-treated clothing as a very different matter that does not pose the same threats to bees and aquatic organisms or ourselves posed by our widespread use of pyrethrins & pyrethroids otherwise. Use of such clothing when walking in areas where black-legged ticks carrying Lyme are known to occur and during seasons when they are most active, on the other hand, greatly reduces the chances of getting bitten by these ticks and contacting Lyme

disease. In one study there was a 93% reduction in the total incidence of tick bites compared to subjects using standard tick bite prevention measures.

I think it is only a matter of time before permethrin-treated clothing and other fabrics are introduced to Canada, but it would certainly be re-assuring to see some public discussion of the issue by health officials - and potentially many cases could be avoided by first permitting and then promoting appropriate use sooner rather than later. Why this has not happened is made all the more perplexing by contradictory information coming from Health Canada. While the PMRA, an agency of Health Canada has, apparently, turned down at least one application to register permethrin-treated clothing in Canada (as detailed in the attached letter), Health Canada's "Statement on Personal Protective Measures to Prevent Arthropod Bites" at <http://www.phac-aspc.gc.ca/publicat/ccdr-rmtc/12vol38/acs-dcc-3/index-eng.php> reads (bolding mine):

9. Insecticide-treated clothing (ITC) have been shown to protect against **the bites of arthropods (64)-(Footnote 67) and there also is evidence that they can protect against AAD Footnote(68). Use of ITC is therefore recommended for protection against AAD. ITC products currently registered in Canada contain permethrin and are limited to military use. However, many permethrin-based ITC products are available for civilian use in the US.** They generally are available as a formulation that contains 0.5% permethrin and that the consumer applies to their own clothing, or as clothing that has been pre-treated to a level of 0.52% permethrin weight/weight. These approaches differ in that the latter approach is labelled to provide protection through tens of washes whereas the 0.5% product typically protects through several washes. Both are available from major US online retailers, **and should be obtainable for personal use by Canadian consumers\***Footnote Footnote(69). For all treated garments or garment treatments, users should adhere to instructions provided on the label. As for topical repellents and ITN, until such time as ITC are registered in Canada, **US EPA registered products are preferred over those available in other non-Canadian jurisdictions**

So it seems that Health Canada is advising Canadians, in this instance, to import materials that are not legally usable in Canada by their own regulations! Isn't this a very mixed message?

As with the letter I sent last year, I am cc'ing Meghan Leslie, as I have been doing on most of my correspondence related to Lyme/Ticks, because registration is a federal issue. I have also sent letters directly to her and to Elizabeth May who championed [Bill, C-442, the Federal Framework on Lyme Disease Act](#)

To date, neither has responded so I appreciate very that you responded promptly a year ago and am likewise grateful for any update.

Sincerely,

David Patriquin  
Professor of Biology (retired)  
Dalhousie University

cc: Meghan Leslie

-----

Strang, Robert  
Mon 4/7/2014 11:49 AM

Dear Dr. Patriquin,

Thank you for bringing the issue of permethrin treated clothing to me attention. I will raise this issue with colleagues in the Public Health Agency of Canada and ask them to try and resolve the issue with the PMRA. I will keep you updated on any progress on a resolution.

Sincerely,

Rob Strang