

***Force of Nature.
The Whole Truth from an
Independent Perspective.
Special Report.***

The Wisdom of Holland !

Part 1

05/04/2009

Quebec-NAFTA-2,4-D affair

**Mr. Holland's response
on behalf of Integrated
Environmental Plant
Management Association
of Western Canada**



April 5th, 2009

John J. Holland
Communications Director

Public Letter



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**<< From your statements, I would have
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05 April 2009

Hon. Stockwell Day
Minister of International Trade
Government of Canada
DayS@parl.gc.ca

Minister Day :

I am the Communications Director for the **Integrated Environmental Plant Management Association of Western Canada (IEPMA)**. My position is a volunteer one (unpaid), and I have been retired for 4 ½ years. The reason I continue to work with the **IEPMA** is due to my increasing dismay with the trivialization, ignoring, and purposeful misinterpreting of science by environmentalist activists, as well as the total disregard for science and scientists from the Municipal to the Provincial level.

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I have read — with great concern — of your promised support for the Province of Quebec's position on the banning of **2,4-D** in its fight against **Dow Chemical** (National Post, **March 29/09**).

Agencies of your own Government — namely **Health Canada** and the **PMRA** [**Pest Management Regulatory Agency of Health Canada**] — have stated on numerous occasions that **2,4-D** poses no unacceptable risks to the public. For example, in the **Re-evaluation Decision RVD2008-11** (**May 16, 2008**), it is stated :

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Products containing 2,4-D do not pose unacceptable risks to human health or the environment. They also have value for lawn and turf, agriculture, forestry and industrial uses when used according to the label directions proposed in previous consultation documents.

From your statements, I would have to assume that you must consider the 350 qualified scientists of the PMRA incompetent and/or incapable of arriving at correct scientific findings.

The same conclusion on the safety of 2,4-D has been arrived at by the PMRA, the U.S Environmental Protection Agency [EPA], and almost all other members of the OECD [Organisation for Economic Co-operation and Development]. Perhaps we should save a great deal of money, and simply get rid of all those scientists, since it appears that the very Government that provides their pay cheques does not feel it worthwhile to listen to them, and instead would base a decision relying on 'junk' science. It should also be noted that recent re-evaluations have also been undertaken by the European Union, the U.S. EPA [Environmental Protection Agency] , New Zealand, and the World Health Organization — none of which classify 2,4-D as a human carcinogen. Are you suggesting that this multitude of scientists is wrong ? Your position, at the very least, undermines the credibility of the PMRA, a highly and internationally respected Canadian agency.

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I have also read through the Briefing Note “*Potential NAFTA [North American Free Trade Agreement] Challenge to Quebec’s Ban of 2,4-D Lawn Pesticides*” (March 24/09) prepared by **Ecojustice** and other activist associations, and no doubt forwarded to you. As is the case in so many other activist documents, this one is replete with misleading and incorrect ‘*facts.*’ Again, all you have to do is run this document past the **PMRA [Pest Management Regulatory Agency of Health Canada]** for their interpretation.

As you may be aware, there are also numerous misleading — or unscientific — studies with such a negative point of view, such as the **Ontario College of Family Physicians’ [OCFP]** Pesticide Literature Review (2004). This review has been used to support almost every proposed pesticide ban, from the Municipal to the Provincial (e.g., Ontario) level.

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The information used by those like the **OCFP [Ontario College of Family Physicians]** has been cherry-picked by the physicians — not scientists — writing the report, and the report has been discounted by many scientists and government experts in this and other countries. Studies used are generally all epidemiological, and links to cancer and other diseases have been weak and not consistent from study to study. Toxicological studies do not confirm the epidemiological findings. By definition, epidemiology cannot find causes : they merely suggest correlations, and the basic tenet of epidemiology is that correlation does not mean causation. Studies must also be consistently reproducible before a finding can be found meaningful. At any rate, the **OCFP** study ignored or downplayed other important epidemiological studies that did not conform to its premise of the dangers of pesticides (again, check with the **PMRA**).

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2,4-D has been registered in our country since **1946**, and is the third-most used herbicide in Canada. If there were health problems related to **2,4-D**'s application, it would seem obvious that concrete proof — after **over 60 years of use** — would have surfaced by now, particularly when you realize that there have been thousands of studies, and numerous re-evaluations by both **Health Canada** and the U.S. **EPA [Environmental Protection Agency]**. This herbicide is probably the most studied pesticide in history.

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I am not generally a supporter of large international conglomerates such as **Dow**. However, when a company follows all Provincial and Federal regulations, and when a chemical they produce is banned from use solely because of political considerations, what options are available ? There are absolutely no bona fide scientific grounds upon which to ban **2,4-D**. It is the **Government of Quebec** that has forced **Dow** into the position it now takes. When one side abides by all the governmental rules, while the other side does not, what other direction can be taken ?

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As the **Minister of Trade**, you should be supporting the right of businesses and industries to operate within the rules you set. It is easy to take a stance against what is viewed by many simply as “*Big Business*,” and more difficult to do the right thing in such situations.

It has been noted, by scientists and many others, that the numerous bans of pesticides, from the Municipal to the Provincial level, will have a negative effect upon the research and development of new and important pesticides. Why would a company spend **hundreds of millions of dollars** and **up to 20 years** for development in an uncertain market ? One of the reasons we are able to enjoy the life that we now do is because agriculture no longer requires millions more labourers employed in the production of food, something that would be required if no pesticides were used. Pesticides have ensured us good crops and food at reasonable prices. The activists that are adamantly behind the ban of so-called ‘*cosmetic*’ pesticides have made it clear that they will next be looking at the golf course industry and then agriculture itself. By supporting the ban of tested and proven products such as **2,4-D**, you are helping the activists along this course.

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Neither you nor the **Government of Canada** has to directly back **Dow** or any corporation in this situation. I am requesting, as a citizen of the Okanagan and a taxpayer of Canada, that my representatives and Government back science and not a political position. What I have outlined in this letter does not even touch upon a fraction of the scientific information that is easily available. Any facts or science on the subject that you could possibly require can be obtained as easily as contacting your Government's own **PMRA [Pest Management Regulatory Agency of Health Canada]**.

If you do believe that your position and that of **Quebec's** is based upon science, I would appreciate it if you could forward me links or directions as proof of this. I would like to know what information you have that is not available to **Health Canada**, the **PMRA**, the **U.S. EPA [Environmental Protection Agency]**, the **UK Government**, and many others. After being involved in the tree and lawn care profession for **30 years**, and after many years of doing my own investigations on the effects of pesticides on human health, I have yet to discover any legitimate and reproducible scientific study that could possibly lead me to conclude that **2,4-D** poses a risk to either the general public or to the applicators themselves. As the author Anatole France once said, "*If fifty million people say a foolish thing, it is still a foolish thing.*"

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I realize that the **Conservative Party** would like to increase its popularity in **Quebec**, but I firmly believe it is time that Government — at all levels — comes to the support of science without engaging in partisan politics.

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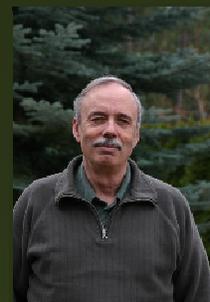
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Recently, you stated that, “ *Despite scientific evidence that supports humane harvesting techniques, and testimony from Inuit communities as to the harmful effect of the proposed ban, the EU continues to push forward with a proposal that will damage the livelihood of coastal and northern Canadians and their families* ” (**CBC News**, April 3, 2009). Is science only fit to be used when it supports your political position ? Do you not realize that the proliferation of pesticide bans is financially harmful to the thousands of applicators employed in the service industry ?

It is time to do the right action for the right reasons. Eventually, I believe that the truth — as supported by real science — will become apparent to all involved. I would hope that thinking and intelligent people would want to be seen as having been on the right side.

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John J. Holland
Communications Director
**Integrated Environmental
Plant Management Association
of Western Canada**
iepma@shaw.ca



cc: Prime Minister **Stephen Harper**
Hon. **Ron Cannan**
Hon. **Michael Ignatieff**

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John J. Holland is Communications Director for **Integrated Environmental Plant Management Association** of Western Canada (I.E.P.M.A.). He is one of the most eloquent and intelligent writers on the subject of public policy and pest control products.



Here is a list of Mr. Holland's career highlights and accomplishments :

Honours BA in History and Geology.

Post-graduate work in History.

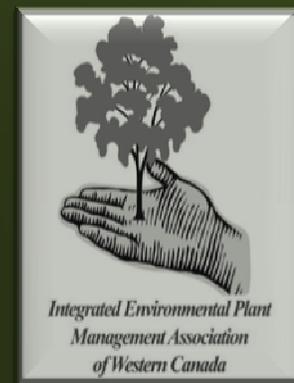
After university, co-owned a large bookstore in Ontario.

Moved to British Columbia from Ontario in 1978.

Worked for a structural pest control company in British Columbia for three years, the last two of which Mr. Holland was a supervisor.

Owned a large tree and lawn care company in the Okanagan from 1983 until 2004, when he retired.

One of the founders of the ESA (Environmental Standards Association — forerunner to the **Integrated Environmental Plant Management Association** of Western Canada) in 1984.



President of the Environmental Standards Association, 1985 — 1994.

Vice-President of the **Integrated Environmental Plant Management Association**, 1998 — 2007.

Director of the **Integrated Environmental Plant Management Association**, 2007 — present.

According to Mr. Holland :

“ ALTHOUGH I HAVE NEVER USED MY DEGREE IN THE PROFESSION FOR WHICH I STUDIED, I FOUND THAT THE TRAINING I RECEIVED IN THE METHODS OF RESEARCH WAS INVALUABLE IN ENABLING ME TO DISCERN THE FACTS OF THE REAL SCIENCE BEHIND THE USE OF PESTICIDES. NOT BEING A SCIENTIST, I HAVE ALWAYS BEEN GUIDED BY THE WORK OF THOSE WHO ARE THE ACTUAL EXPERTS.”

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*The villagers of F.O.N.
are very happy ...*



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*... more people understand the
malicious & destructive problems
created by the twisted policies of
the environmental terror movement.*

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FORCE OF NATURE was launched for continuous transmission on the Internet on January 1st, 2009. It is a series of e-newsletters destined for the GREEN SPACE INDUSTRY, the ENVIRONMENTAL TERROR MOVEMENT, politicians, municipalities, and the media, nation-wide across Canada, and parts of the United States and overseas. Force of Nature is produced in two parts. First. The Media Report itself that reports on the current events affecting the future of the GREEN SPACE INDUSTRY. Second. Independent Perspective, which is a running commentary, sometimes technical in nature. Force of Nature is the WHOLE TRUTH from an INDEPENDENT PERSPECTIVE !

Force of Nature is the brainchild of William H. Gathercole and his entourage. Norah G is actually an acronym for the stable of writers that contribute to this e-newsletter. The opinions expressed in Force of Nature, even though from an INDEPENDENT PERSPECTIVE, may not reflect those of everyone in the GREEN SPACE INDUSTRY, or Mr. Gathercole's many associates. Be warned ! Mr. Gathercole and Norah G may sometimes be very irreverent and fearless with these e-newsletters. DONT THANK US. IT'S A PUBLIC SERVICE. AND WE ARE GLAD TO DO IT.



William H. Gathercole holds a degree in Horticulture from the UNIVERSITY OF GUELPH, and another pure and applied science degree from MCGILL UNIVERSITY. He has worked in virtually all aspects of the GREEN SPACE INDUSTRY, including public affairs, personal safety, and environmental issues. Mr. Gathercole has been a consultant and instructor for decades. He also been an agricultural agronomist. Mr. Gathercole has been following the evolution of ENVIRONMENTAL TERRORISM for over a quarter-century. His involvement in environmental issues reached a fevered pitch in the 1990s, when he orchestrated, with others, legal action against unethical and excessive municipal regulations restricting the use of pest control products. (i.e. the Town of Hudson.) Although he can be accused of being ANTI-ENVIRONMENT-MOVEMENT, he is, in fact, simply a strong advocate FOR the GREEN SPACE INDUSTRY. However, this position has not precluded him from criticizing the Green Space Industry itself. Nonetheless, his vast knowledge of our long journey with environmental issues is UNDENIABLE. (Hopefully !) For many years, Mr. Gathercole has been a contributing columnist for TURF & Recreation Magazine, Canada's Turf and Grounds Maintenance Authority.

All document excerpts and pictures contained in Force of Nature were found somewhere on the Internet. We believe that they are in the public domain, serving one of the following purposes : archive, education, promotion, publicity, or press release.

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We believe that environmental terrorism can be BEATEN ! Information presented in Force of Nature has been developed for the education and entertainment of the reader. The events, characters, companies, and organizations, depicted in this document are not always fictitious. Any similarity to actual persons, living or dead, may not be coincidental. The mission of Force of Nature is to respond to those statements and activities originating from culprits that conspire to prohibit FEDERALLY LEGAL, SCIENTIFICALLY SAFE, and TOTALLY IRREPLACEABLE conventional pest control products. Culprits are identified on the basis of their statements, activities, affiliations, and whereabouts. Even though each culprit is a mis-guided adversary, each still deserves our respect. The term « culprit » is not an accusation of any legal wrong-doing. Force of Nature is simply holding culprits accountable for changes in public policy that have terrorized the Green Space Industry. Force of Nature believes that the prohibition policies of the ENVIRONMENTAL TERROR MOVEMENT will lead to UNEMPLOYMENT, BANKRUPTCY, BUSINESS FAILURE, DESPAIR, and DESTITUTION. The actions of the movement is viewed as a form of TERROR against the Green Space Industry.

The following titles are currently available. (Or, will be available in the near future.) • Alberta Prohibition • British Columbia Prohibition • Canadian Association of Physicians for the Environment • Canadian Environmental Law Association • Consequences • David Suzuki Foundation • DDT and Politicized Science • Death and the Environmental Movement • Golf and Landscape Trade Industries • June Irwin, The Clown of Junk Science • Kazimiera Jean Cottam • Kelowna BC Prohibition • New Brunswick Prohibition • Nova Scotia Prohibition • Ontario Prohibition • Organic Fertilizers • Pets and Lawn Care Chemicals • Prince Edward Island Prohibition • Quebec Prohibition • Rachel Carson, The Queen of Junk Science • Randy Hillier, The Next Premier of Ontario • Salmon Arm BC Prohibition • The 9/11 Era of the Green Space Industry • The Failure of Integrated Pest Management • The Industry Strikes Back • The Misconceptions About Cancer • The Wisdom of Drysdale • The Wisdom of the Solomons • Wisconsin Fertilizer Prohibition • ASK FOR A COPY OF ANY BACK ISSUE OF FORCE OF NATURE TODAY. READ ALL ABOUT ENVIRO-MANIACS AND THEIR ENVIRONMENTAL TERROR ORGANIZATIONS IN FORCE OF NATURE ! THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE !

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ENVIRO-MANIACS
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TERROR
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Pest control
products
are **LEGAL,**
SAFE, and
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The
WHOLE TRUTH
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Environmental
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