

# NORAHG

JUNE 19th, 2012

LETTER TO THE EDITOR — MEDIA RELEASE

RESPONSE TO GHOST-WRITER USING THE NAME COTTAM

## **Who Is Cottam ?**

COTTAM is actually a designation for a group of Anti-Pesticide Ghost-Writers, like MEG SEARS, designed to DECEIVE the public ANONYMOUSLY.

Cottam Ghost-Writers have been using the COTTAM name as a SHIELD AGAINST IMMINENT LEGAL REPRISALS FOR FRAUD AND CONSPIRACY.

These Ghost-Writers continually attempt to CONFUSE and SUBVERT the issues surrounding pest control products by using statements like « *don't trust Health Canada to study pesticides* ».

They also ALLEGE being somehow « *familiar with the Ottawa pesticide approval scene* », which is NOT TRUE.

For their own VESTED INTERESTS, they want to IMPOSE a PROHIBITION against pest control products used in the Urban Landscape.

COTTAM GHOST-WRITERS ( Web-Page )

<http://wp.me/P1jq40-2V6>

## **Health Canada Needs Laboratories ?**

Cottam Ghost-Writers express MOCK-DISMAY about the fact that Health Canada does NOT have its own laboratories.

Clearly, this is an attempt to INVALIDATE this federal government agency.

Just because regulatory agencies like Health Canada do not conduct any studies themselves DOES NOT MEAN that they are merely « *rubber stamping* » studies submitted to them by the manufacturing industry.

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In Canada, pest control products, or pesticides, are regulated by Health Canada under the Pest Control Products Act, and are among the most stringently regulated substances in Canada.

In order to ensure the ACCURACY of ASSESSMENTS of pest control products, Health Canada DOES NOT NEED ITS OWN LABORATORIES, and neither does any other regulatory agency in the world.

ALL ASSESSMENTS used for the APPROVAL of pest control products must be completed by laboratories sanctioned by GOOD LABORATORY PRACTICE ( GLP ), and using ONLY GLP practices.

Instead, Health Canada follows the internationally-accredited GOOD LABORATORY PRACTICE for ASSESSING THE SAFETY of pest control products.

GOOD LABORATORY PRACTICE allows Health Canada to be IMPARTIAL and RIGOROUS.

The ACCURACY of ASSESSMENTS of pest control products is ENSURED since Health Canada follows a set of guidelines and principles developed by the Organisation for Economic Co-Operation and Development ( OECD ).

The 30 OECD member countries include Canada, the United States, the United Kingdom, Sweden, and Japan.

The ASSESSMENTS of ALL pest control products must be conducted under those guidelines which adhere to principles of the internationally-accredited GOOD LABORATORY PRACTICE.

Ultimately, the cost to manufacturers to get a pest control product ASSESSED FOR SAFETY and brought to market is about 250 MILLION DOLLARS.

Only those pest control products that pose NO UNACCEPTABLE RISK to health and environment become HEALTH-CANADA-APPROVED and FEDERALLY-LEGAL.

There is NO NEED for Health Canada laboratories.

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## **Information Withheld From Health Canada ?**

Cottam Ghost-Writers have CONCOCTED the story that NEGATIVE ASSESSMENTS are somehow withheld by manufacturers from Health Canada.

Clearly, this is another attempt to INVALIDATE this federal government agency.

They CONCOCT the story that Health Canada is « *embracing the manufacturers' point of view* », and that inconvenient studies ( a.k.a. secret evidence ) is being withheld by manufacturers.

This IMPLIES that ASSESSMENTS are somehow being withheld by manufacturers from EVERY regulatory agency in the world.

This is LUDICROUS.

Again, GOOD LABORATORY PRACTICE allows Health Canada to be IMPARTIAL and RIGOROUS.

ALL ASSESSMENTS used for the APPROVAL of pest control products must be completed by laboratories sanctioned by GOOD LABORATORY PRACTICE ( GLP ), and using ONLY GLP practices.

The ACCURACY of ASSESSMENTS of pest control products is ENSURED since Health Canada follows a set of guidelines and principles developed by the Organisation for Economic Co-Operation and Development ( OECD ).

## **Epidemiology Is Not Used By Health Canada ?**

Cottam Ghost-Writers ALLEGE that Health Canada is somehow « *weak* » in examining EPIDEMIOLOGICAL STUDIES when evaluating the safety of pest control products.

This is NOT TRUE.

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EPIDEMIOLOGY is the study of the causes, distribution, and control of health problems in populations.

EPIDEMIOLOGY STUDIES cannot be relied upon ALONE, and must be backed-up with ANIMAL TOXICITY STUDIES.

These ANIMAL TOXICITY STUDIES are assessed to determine if there is any biological basis for the POTENTIAL ASSOCIATIONS noted in EPIDEMIOLOGY STUDIES.

The examination of ANIMAL TOXICITY STUDIES from internationally-accepted guideline studies using doses well-above those to which humans are typically exposed, combined with exposure data obtained from well-designed studies, is currently a useful methodology available for assessing risks to human health.

Health Canada's Pest Management Regulatory Agency ( PMRA ) undertakes this kind of ASSESSMENT to SUPPLEMENT INFORMATION about POTENTIAL ASSOCIATIONS that may be established by EPIDEMIOLOGY STUDIES.

This approach is consistent with that of other regulatory authorities that base human health risk assessments on ANIMAL TOXICITY DATA.

## **Pest Control Products Are Scientifically-Safe**

Health Canada, and NOT Cottam-Ghost-Writers, has THE ESSENTIAL EXPERTISE on the subject of pest control products.

Cottam Ghost-Writers are RIDICULOUSLY IMPLYING that its NON-EXPERT ASSESSMENT is somehow being withheld from Health Canada and EVERY other regulatory agency in the world.

The following educational, regulatory, research, scientific, and trade agencies have CONCLUSIVELY SUPPORTED or VALIDATED the concept that pest control products are SCIENTIFICALLY-SAFE • American Chemical Society • American Council for Science and Health • American Cancer Society • British Columbia's Special Committee On Cosmetic Pesticides • Canadian Medical Association • CropLife Canada • Health Canada • Institute of Public Affairs • International Agency for Research on Cancer

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- Ontario Pesticides Advisory Committee
- The Fraser Institute
- U.S. Environmental Protection Agency
- World Health Organization.

Are we to believe that an assessment from ANONYMOUS Ghost-Writers is somehow worth more than Health Canada ?!?!

WILLIAM H. GATHERCOLE AND NORAH G

NORAHG is the National Organization Responding Against HUJE that seek to harm the Green space industry.

NORAHG is a NATIONAL NON PROFIT NON PARTISAN organization that does not accept money from corporations or governments or trade associations, and represents NO VESTED INTERESTS WHATSOEVER.

NORAHG is dedicated to reporting the work of RESPECTED and HIGHLY RATED EXPERTS who promote ENVIRONMENTAL REALISM and PESTICIDE TRUTHS.

THE PESTICIDE TRUTHS WEB-SITE

<http://pesticidetruths.com/>

PESTICIDE BANS ARE A FARCE ( Report )

<http://wp.me/p1jq40-4mS>

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