Introduction

Despite claims to the contrary, overall, there are NO viable, efficacious, or economical Green Alternatives to replace conventional pest control products.

Virtually all Green Alternatives are BOGUS, displaying negative characteristics such as the following —

- Green Alternatives may be ALMOST TOTALLY INEFFECTIVE except under very specific circumstances
- Green Alternatives may be PROHIBITED in some jurisdictions
- Green Alternatives may be questionably HIGHER IN TOXICITY
- Green Alternatives may be STUNNINGLY MORE EXPENSIVE to use when compared to conventional pest control products
- Green Alternatives may be SUPPLIED by the same Environmental–Terror–Organizations that sought the prohibition of conventional pest control products
- Green Alternatives may have NEGATIVE SIDE–EFFECTS like phyto–toxicity (an effect that adversely affects plant growth) or metal corrosion or rodent–attractant
- Green Alternatives may NOT be registered as pest control products, and therefore are UNREGULATED
- Green Alternatives may NOT have a full range of safety information such as HUMAN TOXICITY and ENVIRONMENTAL IMPACT, which is necessary for the registration of conventional pest control products
- Green Alternatives may require EXTREMELY–HIGH–INPUTS OF ACTIVE INGREDIENT since they will otherwise be less effective
- Green Alternatives may require MORE PERSONAL PROTECTION for the user
- Green Alternatives may NOT BE SAFER, NOT BETTER, and NOT MORE EFFECTIVE

Description of entomo–pathogenic nematodes

Nematodes (also called entomo–pathogenic or beneficial nematodes) are microscopic roundworms, or tiny worm–like parasites that lack any appendages.

They are found in products that are classified by the government as bio–pesticides since they contain living organisms.

This product acts as a biological turf insecticide that, incredibly, is NOT FEDERALLY REGISTERED as a pest control product in Canada.

The term « entomo–pathogenic » comes from two Greek words —

« entomon » which means insect, and
« pathogenic » meaning causing disease.

Classification of entomo–pathogenic nematodes

Entomo–pathogenic nematode products are considered by the environmental–mania–activists as a so–called low–risk or « reduced–risk » green alternative to conventional insecticides like imidacloprid.
Overview from an Independent Perspective

Nematodes have been classified, or described, in a multitude of ways in order to appeal to enviro–maniacs, the public, and to the Green Space Industry.

Here are some examples —

- Beneficial nematode product
- Bio–control of insect pests
- Biological control agent
- Biological insecticide
- Bio–pesticide or bio–insecticide
- Bio–suppression of insect pests
- Commercial nematodes
- Entomo–pathogenic nematodes
- Exotic nematodes
- Infective juvenile nematodes
- Low or reduced–risk pesticide
- Microscopic worms or roundworms
- Natural insecticide or pesticide
- Natural organism
- Nematode product
- Parasitic nematodes

The Failure to Regulate entomo–pathogenic nematodes

Entomo–pathogenic nematode products are NOT registered as pest control products in Canada.

Consequently, there is NO obligation on the part of the manufacturer to divulge a full range of safety information such as human toxicity and environmental impact, which is the case with conventional pest control products.

This information will eventually be required, not just concerning the nematodes themselves, but also for the symbiotic bacteria that they carry.

It is inevitable that the FAILURE TO REGULATE nematode products will eventually create a public relations problem.

It will not be taken for granted for very long that an organism that is defined as « infective » will require the need for more safety information in order to justify its status as « reduced–risk ».

Additionally, the failure to regulate nematode products appears to be in direct contravention of the federal definition of a « pest control product » (or « pesticide »), as interpreted by the federal Pest Control Products Act.

Regulatory Policy Concerning entomo–pathogenic nematodes

In the early 1980s, the commercial development of entomo–pathogenic nematodes in America was aided by an exemption from registration.

Canada followed and adopted a similar approach a few years later.

Little was known about the RISKS associated with the introduction of entomo–pathogenic nematodes, and concerns eventually arose about the considerable exchange of nematode germplasm occurring between laboratories.

The issues for entomo–pathogenic nematodes sparked a rethinking of the mechanisms by which the U.S. should regulate exotic natural enemies of pests.

There are now complex regulatory procedures and safeguards in place for the introduction of nematodes.

List of Reduced–Risk Pest Control Products excludes entomo–pathogenic nematodes


Entomo–pathogenic nematode products were CONSPICUOUSLY ABSENT.
In April 2009, CropLife Canada issued a public letter to the Ontario Ministry of the Environment regarding BIO-PESTICIDES like entomo-pathogenic nematode products.

CropLife is the trade association representing the manufacturers, developers and distributors of plant science innovations — pest control products and plant biotechnology — for use in agriculture, urban, and public health settings.

Here are excerpts from the CropLife letter —

<< The description used in Class 11, « certain bio-pesticides and naturally derived pesticides » DOES NOT CONSTITUTE SCIENTIFIC CRITERIA.

There is NO SCIENTIFIC MERIT for the differentiation between naturally derived and synthetic products.

This type of ARBITRARY DESIGNATION perpetuates the misconception that « natural » automatically means « safe ».

We know of numerous examples of substances that are naturally occurring — such as arsenic, lead, and nicotine — that would clearly NOT BE APPROPRIATE FOR THIS CLASS.
The active ingredients listed here certainly do not encompass the full range of innovative, low-risk products that have been made available by members of CropLife Canada.

CropLife Canada requests that the Ministry provide its rationale for the definition of Class 11. [...] We would suggest that the Province of Ontario consider the Health Canada model, which bases all pesticide assessments on science and the inherent properties of all products — both natural and synthetic — as part of the risk assessment.

Jeffrey P. Lowes is a spokesman for the Green Space Industry.

On August 11th, 2010, Lowes issued a report with comments concerning the manufacturers’ position on entomo-pathogenic nematode products —

The large manufacturers and suppliers of pest control products have AVOIDED the sale of entomo-pathogenic nematode products to the Professional Lawn Care Industry in order to AVOID any long-term liabilities.

In the event of any LIABILITIES with entomo-pathogenic nematode products, the current suppliers DO NOT have the resources to deal with the situation.

In the event of any LIABILITIES with entomo-pathogenic nematode products, the BURDEN will fall squarely on the Professional Lawn Care Industry.

Neither the federal nor the provincial governments have officially SCHEDULED or CLASSIFIED entomo-pathogenic nematode products as a « pest control product ».

However, entomo-pathogenic nematode products are listed as « alternative pest controls for turf » by Guelph Turfgrass Institute of the University of Guelph and the Province of Ontario.
The Entomo–Pathogenic Nematode Industry Must Immediately Address Sixteen Critical Issues —

Nematodes ( also called entomo–pathogenic or beneficial nematodes ) are found in products that are classified by the government and manufacturers as « bio–pesticides » since they contain living organisms.

Industry observers have concluded that, in order to guarantee that nematode products continue to remain available in the marketplace, the Entomo–Pathogenic Nematode Industry in Canada must immediately address the following SIXTEEN CRITICAL ISSUES —

1. COMPOSITION — The Entomo–Pathogenic Nematode Industry must divulge the FULL CONTENTS and COMPOSITION of all nematode products.

2. AVOID TRADE SECRETS — The Entomo–Pathogenic Nematode Industry must avoid the practice of protecting « trade secrets » pertaining to all nematode products.

3. SAFETY — The Entomo–Pathogenic Nematode Industry must publicly explain why it deems nematodes as « minimum–risk » or « reduced–risk », or safer, when compared to conventional pest control products.

4. INSECTICIDE — The Entomo–Pathogenic Nematode Industry must clearly indicate in its advertisements that nematodes are « insecticides », and are inherently NO different than conventional pest control products.

5. CHILDREN — The Entomo–Pathogenic Nematode Industry must divulge a full range of information regarding all potential hazards of nematode products specific to CHILDREN.

6. TOXICITY — The Entomo–Pathogenic Nematode Industry must divulge a full range of information regarding HUMAN TOXICITY ( short–term, chronic, irritation, sensitization, developmental, mutagenic, and teratogenic ), as is the case with conventional pest control products registered under the Federal Pest Control Products Act.

7. ENVIRONMENT — The Entomo–Pathogenic Nematode Industry must divulge a full range of information regarding ENVIRONMENTAL IMPACTS ( eco–toxic fate and degradation ), as is the case with conventional pest control products under the Federal Pest Control Products Act.

8. RE–ENTRY PERIODS — The Entomo–Pathogenic Nematode Industry must divulge a full range of information regarding SAFE RE–ENTRY after application, as is the case with conventional pest control products.

9. SANCTIONED TESTING — The Entomo–Pathogenic Nematode Industry must have all safety data generated by GOOD LABORATORY PRACTICE ( GLP ) qualified laboratories, as is the case with conventional pest control products registered under the Federal Pest Control Products Act.

10. FEDERAL DEFINITION — The Entomo–Pathogenic Nematode Industry must clearly indicate on its labels that the nematodes in its products are defined as « pest control products » ( or « pesticides » ), as interpreted by the Federal Pest Control Products Act.

11. FEDERAL REGISTRATION — The Entomo–Pathogenic Nematode Industry must seek to FEDERALLY REGISTER all nematode products under the Federal Pest Control Products Act. ( Incredibly, nematodes are not yet federally registered as a pest control product in Canada. )

12. INFECTIVE & BACTERIA — The Entomo–Pathogenic Nematode Industry must clearly indicate on its product labels that nematodes are « infective organisms », and carriers of « symbiotic bacteria ».

13. RIGHT–TO–KNOW — The Entomo–Pathogenic Nematode Industry must develop a fully transparent and publicly accessible database for right–to–know information concerning its products, including MATERIAL SAFETY DATA SHEETS, as is the case with conventional pest control products.

14. FULL RELEASE OF SAFETY INFORMATION — The Entomo–Pathogenic Nematode Industry must divulge safety information not just concerning the nematodes themselves but also with regards to the SYMBIOTIC BACTERIA that they carry, and any other ingredients such as potato–starch packaging.

15. NON–TARGET ORGANISMS — The Entomo–Pathogenic Nematode Industry must conduct research performed in Canada regarding the impact of using nematode products on HOUSEHOLD PETS, BIRDS, and BENEFICIAL INSECTS, as is the case with conventional pest control products.

16. EFFICACY — The Entomo–Pathogenic Nematode Industry must publish research performed in Canada regarding the efficacy, or insecticidal performance, of all nematode products concerning the EXPECTED PERCENT SUPPRESSION of insects that damage turfgrasses.
Force Of Nature presents THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE from National Organization Responding Against Huje. Our mission is to reveal the truth about the Green Space Industry (NORAH). It is a series of reports dedicated to stopping the Green Space Industry's (GSI) environmental terrorism. We are a group of activists that routinely contact FEAR MONGERING, FRAUDULENT LIES, MISCONCEPTIONS, DECEPTIONS, TERROR, and PARANOID CONSPIRACIES that are DESIGNED to SCAM and DECEIVE the public into believing there is some NON–EXISTENT danger with conventional pest control products.

Huje is a term used to describe Enviro Maniac Activists that routinelly concoct FEAR MONGERING, FRAUDULENT LIES, MISCONCEPTIONS, DECEPTIONS, TERROR, and PARANOID CONSPIRACIES that are DESIGNED to SCAM and DECEIVE the public into believing there is some NON–EXISTENT danger with conventional pest control products. Huje also SCAM and DECEIVE Government Officials into the NEEDLESS, SENSELESS, and MALICIOUS PROHIBITION of conventional pest control products that are FEDERALLY LEGAL, SCIENTIFICALLY SAFE, TOTALLY IRREPLACEABLE, and ABSOLUTELY INDISPENSABLE.

There is nothing so powerful as truth, and often nothing so strange.