



Cosmetic Use of Pesticides
in British Columbia —
Public Consultation Paper



The Whole Truth from an Independent Perspective

British Columbia Prohibition of Pest Control Products! Part 4C

Government document

COSMETIC USE OF PESTICIDES IN BRITISH COLUMBIA — PUBLIC CONSULTATION PAPER

DECEMBER 16TH, 2009

(ADAPTED EXCERPTS)

THIRD OF FOUR PARTS

INTRODUCTION

In the AUGUST 25TH 2009 **Speech from the Throne**, the **Government of British Columbia** committed to consult British Columbians on “ *new statutory protections to further safeguard the environment from cosmetic chemical pesticides.* ”

This consultation paper [... IS] intended to stimulate conversation [IN ORDER TO] gather your input on this topic.

The **Ministry of Environment** (the ministry) has prepared background information and identified consultation issues for discussion to build understanding about the subject and provide a structure for comments and feedback. Additional comments or suggestions beyond the identified consultation issues are also welcome.

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CONSULTATION ISSUES FOR DISCUSSION

This section of the consultation paper outlines some key issues in considering regulation of cosmetic use of pesticides in **British Columbia**.

Please review the following information and consultation questions — and let us know what you think, using the response form available on the **Cosmetic Use of Pesticides Consultation Forum** website or by separate submission. Directions for providing comments to the ministry are provided in the final section of this consultation paper.

1. Current Ministry objectives in regulating the use of pesticides

In regulating pesticides and the cosmetic use of pesticides, the ministry currently considers —

- Protection of human health and the environment
- Having a science-based approach
- Supporting the practice of Integrated Pest Management (IPM)
- Being appropriate and effective
- Providing a foundation for understanding and adoption by the public, IPM practitioners and affected interests
- Cost-effective compliance and enforcement

2. Potential regulatory restrictions on “*cosmetic use* of pesticides”

B.C.’s existing laws governing the sale and use of pesticides that might be used for cosmetic purposes —

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- Require that, for pesticide uses on public land or in and around multi-resident dwellings, the pesticide applicator be trained in the safe use of pesticides and use pesticides according to the principles of IPM
- Allow private property owners to use pesticides on their own property for any purpose allowed on the pesticide label — if all label directions are followed
- Do not explicitly define or restrict “ *THE COSMETIC USE OF PESTICIDES* ”

In considering new restrictions for the cosmetic use of pesticides, the ministry is considering the following questions related to the scope of the topic —

- What is and what is not a “ *COSMETIC USE* ” of a pesticide ?
- Can certain pests be considered “ *COSMETIC* ” ?
- Is there a point at which the management of a pest becomes “ *NOT COSMETIC* ” ?
- Is there a difference in using a pesticide to manage pests on a tree used for fruit production in a residential area and a fruit tree that is strictly ornamental ?
- Should the term “*COSMETIC USE OF PESTICIDES*” apply strictly to outdoor situations (e.g., lawns and/or gardens) ?
- Are there situations where the use of pesticides indoors would be considered to be “*COSMETIC*” ?
- How would this (indoor) use of pesticide for cosmetic purposes be defined ?
- Should the regulation of cosmetic pesticides include uses on residential land, public municipal lands, and/or other private lands ?

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Background Information from an Independent Perspective

THE FAILURE OF INTEGRATED PEST MANAGEMENT

In agriculture, INTEGRATED PEST MANAGEMENT (I.P.M.) is a pest control strategy that uses a variety of complementary strategies including : mechanical devices, physical devices, genetic, biological, cultural management, and chemical management. These methods are done in three stages : prevention, observation, and intervention. It is an ecological approach with a main goal of significantly reducing or eliminating the use of pesticides while at the same time managing pest populations at an acceptable level. (SOURCE : WIKIPEDIA.)

UNFORTUNATELY, INTEGRATED PEST MANAGEMENT has been designed to be applicable to the AGRICULTURE INDUSTRY, and **NOT** the GREEN SPACE INDUSTRY. INTEGRATED PEST MANAGEMENT is a FAILURE and a WASTE OF TIME and MONEY for the GREEN SPACE INDUSTRY. Using it accomplishes virtually nothing in terms of resolving the public affairs issues concerning the prohibition of pest control products. Nor does I.P.M. effectively and consistently control the pests of turf and ornamental plants.

WARNING : INTEGRATED PEST MANAGEMENT will **NOT** effectively and consistently control the pests of turf and ornamental plants. At best, it **MAY** provide some LIMITED IMPROVEMENT towards the efficiency and effectiveness of conventional pest control products.

INTEGRATED PEST MANAGEMENT will **NEVER** achieve the total reduction or elimination conventional pest control products used for the management of turfgrasses. Besides, these products are FEDERALLY LEGAL, SCIENTIFICALLY SAFE, and TOTALLY IRREPLACEABLE.

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The GREEN SPACE INDUSTRY is continuously and needlessly apologizing for its use of pest control products when none is necessary.

AND SADLY, the GREEN SPACE INDUSTRY has accepted the FEAR-MONGERING from Enviro-Maniacs as fact.

The Fear-Mongers from within the Environmental-Terror-Movement have traditionally SPREAD PARANOIA and TERROR about pest control products with warnings that contain QUIANT and VAGUE expressions.

Nonetheless, Enviro-Maniacs and their Environmental-Terror-Organizations are WRONG about conventional pest control products !

It is a fact that conventional pest control products are SCIENTIFICALLY SAFE since they have been scrutinized and approved by the HUNDREDS of expert scientists at HEALTH CANADA !

TRUTH : Conventional pest control products are SCIENTIFICALLY SAFE ! Overall, when they are used properly, there are **NO** harmful irreversible effects to health and the environment !

Unfortunately, INTEGRATED PEST MANAGEMENT has **NOT** been scientifically proven to reduce the use of pest control products while effectively and consistently controlling the pests that damage turf and ornamental plants.

Wherever INTEGRATED PEST MANAGEMENT (I.P.M.) is entirely relied upon for the maintenance of turf and ornamentals, damaging pests **MAY** only be slightly suppressed, at the expense of plant growth and playing conditions.

The so-called « *EXPERTS* » of INTEGRATED PEST MANAGEMENT cannot realistically apply the concepts of I.P.M. for maintaining healthy turf and ornamental plants while effectively and consistently controlling damaging pests. Their so-called success stories regarding I.P.M. are usually UNVERIFIABLE.

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INTEGRATED PEST MANAGEMENT has **SEDUCED** hapless victims throughout the GREEN SPACE INDUSTRY into purchasing stunningly expensive **BOGUS** Green Alternative products and services, leading them further into LOSS OF REVENUES, BUSINESS FAILURES, and worst.

INTEGRATED PEST MANAGEMENT is clearly used for the profit of many GREEDY and AVARICIOUS Enviro-Maniacs that promote **BOGUS** Green Alternatives that are **NOT SAFER, NOT BETTER, and NOT MORE EFFECTIVE** than conventional pest control products !

These **BOGUS** Green Alternatives are also a FAILURE and a WASTE OF TIME AND MONEY for the GREEN SPACE INDUSTRY.

INTEGRATED PEST MANAGEMENT Accreditation Programs are **NOT** providing **ANY** protection against Enviro-Terrorists wanting to ANNIHILATE the Modern GREEN SPACE INDUSTRY. Accreditation Programs are also a FAILURE and a WASTE OF TIME AND MONEY for the GREEN SPACE INDUSTRY.

INTEGRATED PEST MANAGEMENT will **NEVER** « *APPEASE* » Enviro-Maniacs from demanding the NEEDLESS, SENSELESS, and MALICIOUS prohibition of FEDERALLY LEGAL, SCIENTIFICALLY SAFE, and TOTALLY IRREPLACEABLE conventional pest control products.

FURTHERMORE, INTEGRATED PEST MANAGEMENT irritates the Environmental-Terror-Movement, and the obstinate perpetuation of I.P.M. by the GREEN SPACE INDUSTRY virtually guarantees that there will be **NO END** to the problems created by Enviro-Maniacs.

INTEGRATED PEST MANAGEMENT will **NEVER** be effective against the NEEDLESS HYSTERIA, FEAR, and TERROR from the cravings of a POWER-HUNGRY, UNSCRUPULOUS, DEPRAVED-ENVIRO-MANIAC-INTELLIGENT-SIA that seek to ANNIHILATE the entire Modern GREEN SPACE INDUSTRY because of NEEDLESS, SENSELESS, and MALICIOUS prohibitionist policies.

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INTEGRATED PEST MANAGEMENT will **NOT** improve the public and political lack-of-confidence regarding the safety of products used by the GREEN SPACE INDUSTRY. The GREEN SPACE INDUSTRY must CEASE focusing on the ineffectual I.P.M. as the solution to its public affairs problems.

The leaders of the GREEN SPACE INDUSTRY that are promoting INTEGRATED PEST MANAGEMENT are leading everyone to their DOOM !

MOST people that promote INTEGRATED PEST MANAGEMENT have **NO** adequate expertise, training, or background, in these matters ! They tend to know about as much as those people listening to them — they are **NOT** true « *EXPERTS* » !

Overall, the opinions of these « *EXPERTS* » may be VALUELESS and WORTHLESS in matters concerning INTEGRATED PEST MANAGEMENT.

MOST people that claim INTEGRATED PEST MANAGEMENT actually works are simply day-dreaming in the OUTER LIMITS.

MOREOVER, several people that allege INTEGRATED PEST MANAGEMENT works effectively are likely concocting LIES, MISCONCEPTIONS, and DECEPTIONS for their own twisted personal interests.

Overall, INTEGRATED PEST MANAGEMENT is a FAILURE and a WASTE OF TIME for the GREEN SPACE INDUSTRY.

Trade associations and business groups that support the concept of INTEGRATED PEST MANAGEMENT **DO NOT** KNOW WHAT THEY ARE TALKING ABOUT, and may actually be deliberately DECEPTIVE and MALICIOUS with their UNVERIFIABLE SUCCESS STORIES !

They are leading everyone to their DOOM !

It is a FAILURE and a WASTE OF TIME listening to them !

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Recommendation from an Independent Perspective

**Stop prohibition in
British Columbia,
to stop it NATIONALLY !**

Fight the Enviro-Basterds NOW !

**The Enviro-Maniacs want
NATIONAL PROHIBITION NEXT !**

**The Enviro-Maniacs want
GOLF INDUSTRY PROHIBITION
AS SOON AS POSSIBLE !**

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Stop prohibition in
British Columbia,
to stop it **NATIONALLY** !

Contact the Members of
the Legislative Assembly
of British Columbia !

It doesn't matter if you don't live in British Columbia.

If we're going to stop the spread of terror,
the Members of the Legislative Assembly
of British Columbia need to hear
from citizens like you from across Canada.

You can copy the text below, and paste it in the « To : » box for composing an e-mail —

"Adrian Dix -- MLA -- Government of British Columbia." <adrian.dix.mla@leg.bc.ca>, "Barry Penner -- Minister of Environment -- Government of British Columbia -- Victoria, British Columbia." <env.minister@gov.bc.ca>, "Barry Penner -- MLA -- Government of British Columbia." <barry.penner.mla@leg.bc.ca>, "Ben Stewart -- MLA -- Government of British Columbia." <ben.stewart.mla@leg.bc.ca>, "Bill Barisoff -- MLA -- Government of British Columbia." <bill.barisoff.mla@leg.bc.ca>, "Bill Bennett -- MLA -- Government of British Columbia." <bill.bennett.mla@leg.bc.ca>, "Bill Routley -- MLA -- Government of British Columbia." <bill.routley.mla@leg.bc.ca>, "Blair Lekstrom -- MLA -- Government of British Columbia." <blair.lekstrom.mla@leg.bc.ca>, "Bob Lucy -- Pesticides Licence Officer -- Integrated Pest Management Program -- BC Ministry of Environment -- Victoria, British Columbia." <Bob.Lucy@gov.bc.ca>, "Bob Simpson -- MLA -- Government of British Columbia." <bob.simpson.mla@leg.bc.ca>, "Bruce Ralston -- MLA -- Government of British Columbia." <bruce.ralston.mla@leg.bc.ca>, "Carole James -- MLA -- Government of British Columbia." <carole.james.mla@leg.bc.ca>, "Claire Trevena -- MLA -- Government of British Columbia." <claire.trevena.mla@leg.bc.ca>, "Colin Hansen -- MLA -- Government of British Columbia." <colin.hansen.mla@leg.bc.ca>, "Dave S.Hayer -- MLA -- Government of British Columbia." <dave.hayer.mla@leg.bc.ca>, "Dawn Black -- MLA -- Government of British Columbia." <dawn.black.mla@leg.bc.ca>, "Diane Thorne -- MLA -- Government of British Columbia." <diane.thorne.mla@leg.bc.ca>, "Don Mcrae -- MLA -- Government of British Columbia." <don.mcrae.mla@leg.bc.ca>, "Donna Barnett -- MLA -- Government of British Columbia." <donna.barnett.mla@leg.bc.ca>, "Doug Donaldson -- MLA -- Government of British Columbia." <doug.donaldson.mla@leg.bc.ca>, "Doug Routley -- MLA -- Government of British Columbia." <douglas.routley.mla@leg.bc.ca>, "Douglas Horne -- MLA -- Government of British Columbia." <douglas.horne.mla@leg.bc.ca>, "Eric Foster -- MLA -- Government of British Columbia." <eric.foster.mla@leg.bc.ca>, "Gary Coons -- MLA -- Government of British Columbia." <gary.coons.mla@leg.bc.ca>, "George Abbott -- MLA -- Government of British Columbia." <george.abbott.mla@leg.bc.ca>, "Gordon Campbell -- MLA -- Government of British Columbia." <gordon.campbell.mla@leg.bc.ca>, "Gordon Campbell -- Premier -- Government of British Columbia." <premier@gov.bc.ca>, "Gordon Hogg -- MLA -- Government of British Columbia." <gordon.hogg.mla@leg.bc.ca>, "Guy Gentner -- MLA -- Government of British Columbia." <guy.gentner.mla@leg.bc.ca>, "Harry Bains -- MLA -- Government of British Columbia." <harry.bains.mla@leg.bc.ca>, "Harry Bloy -- MLA -- Government of British Columbia." <harry.bloy.mla@leg.bc.ca>, "Harry Lali -- MLA -- Government of British Columbia." <harry.lali.mla@leg.bc.ca>, "Iain Black -- MLA -- Government of British Columbia." <iain.black.mla@leg.bc.ca>, "Ida Chong -- MLA -- Government of British Columbia." <ida.chong.mla@leg.bc.ca>, "Jagrup Brar -- MLA -- Government of British Columbia." <jagrup.brar.mla@leg.bc.ca>, "Jane Thornthwaite -- MLA -- Government of British Columbia." <jane.thornthwaite.mla@leg.bc.ca>, "Jenny Kwan -- MLA -- Government of British Columbia." <jenny.kwan.mla@leg.bc.ca>, "Joan McIntyre -- MLA -- Government of British Columbia." <joan.mcintyre.mla@leg.bc.ca>, "John Horgan -- MLA -- Government of British Columbia." <john.horgan.mla@leg.bc.ca>, "John Les -- MLA -- Government of British Columbia." <john.les.mla@leg.bc.ca>, "John Rustad -- MLA -- Government of British Columbia." <john.rustad.mla@leg.bc.ca>, "John Slater -- MLA -- Government of British Columbia." <john.slater.mla@leg.bc.ca>, "John Van Dongen -- MLA -- Government of British Columbia." <john.vandongen.mla@leg.bc.ca>, "John Yap -- MLA -- Government of British Columbia." <john.yap.mla@leg.bc.ca>, "Kash Heed -- MLA -- Government of British Columbia." <kash.heed.mla@leg.bc.ca>, "Kathy Corrigan -- MLA -- Government of British Columbia." <kathy.corrigan.mla@leg.bc.ca>, "Katrine Conroy -- MLA -- Government of British Columbia." <katrine.conroy.mla@leg.bc.ca>, "Kevin Falcon -- MLA -- Government of British Columbia." <kevin.falcon.mla@leg.bc.ca>, "Kevin Krueger -- MLA -- Government of British Columbia." <kevin.krueger.mla@leg.bc.ca>, "Lana Popham -- MLA -- Government of British Columbia." <lana.popham.mla@leg.bc.ca>, "Leonard Krog -- MLA -- Government of British Columbia." <leonard.krog.mla@leg.bc.ca>, "Linda Reid -- MLA -- Government of British Columbia." <linda.reid.mla@leg.bc.ca>, "Mable Elmore -- MLA -- Government of British Columbia." <mable.elmore.mla@leg.bc.ca>, "Marc Dalton -- MLA -- Government of British Columbia." <marc.dalton.mla@leg.bc.ca>, "Margaret Macdiarmid -- MLA -- Government of British Columbia." <margaret.macdiarmid.mla@leg.bc.ca>, "Mary Mcneil -- MLA -- Government of British Columbia." <mary.mcneil.mla@leg.bc.ca>, "Mary Polak -- MLA -- Government of British Columbia." <mary.polak.mla@leg.bc.ca>, "Matt Gordon -- Government Inquiries -- Government of British Columbia." <Matt.Gordon@gov.bc.ca>, "Maurine Karagianis -- MLA -- Government of British Columbia." <maurine.karagianis.mla@leg.bc.ca>, "Michael De Jong -- MLA -- Government of British Columbia." <mike.dejong.mla@leg.bc.ca>, "Michael Sather -- MLA -- Government of British Columbia." <michael.sather.mla@leg.bc.ca>, "Michelle Mungall -- MLA -- Government of British Columbia." <michelle.mungall.mla@leg.bc.ca>, "Mike Farnworth -- MLA -- Government of British Columbia." <mike.farnworth.mla@leg.bc.ca>, "Moirá Stilwell -- MLA -- Government of British Columbia." <moira.stilwell.mla@leg.bc.ca>, "Murray Coell -- MLA -- Government of British Columbia." <murray.coell.mla@leg.bc.ca>, "Naomi Yamamoto -- MLA -- Government of British Columbia." <naomi.yamamoto.mla@leg.bc.ca>, "Nicholas Simons -- MLA -- Government of British Columbia." <nicholas.simons.mla@leg.bc.ca>, "Norm Letnick -- MLA -- Government of British Columbia." <norm.letnick.mla@leg.bc.ca>, "Norm Macdonald -- MLA -- Government of British Columbia." <norm.macdonald.mla@leg.bc.ca>, "Pat Bell -- MLA -- Government of British Columbia." <pat.bell.mla@leg.bc.ca>, "Pat Pimm -- MLA -- Government of British Columbia." <pat.pimm.mla@leg.bc.ca>, "Raj Chouhan -- MLA -- Government of British Columbia." <raj.chouhan.mla@leg.bc.ca>, "Ralph Sultan -- MLA -- Government of British Columbia." <ralph.sultan.mla@leg.bc.ca>, "Randy Hawes -- MLA -- Government of British Columbia." <randy.hawes.mla@leg.bc.ca>, "Rich Coleman -- MLA -- Government of British Columbia." <rich.coleman.mla@leg.bc.ca>, "Richard T. Lee -- MLA -- Government of British Columbia." <richard.lee.mla@leg.bc.ca>, "Rob Fleming -- MLA -- Government of British Columbia." <rob.fleming.mla@leg.bc.ca>, "Rob Howard -- MLA -- Government of British Columbia." <rob.howard.mla@leg.bc.ca>, "Robin Austin -- MLA -- Government of British Columbia." <robin.austin.mla@leg.bc.ca>, "Ron Cantelon -- MLA -- Government of British Columbia." <ron.cantelon.mla@leg.bc.ca>, "Scott Fraser -- MLA -- Government of British Columbia." <scott.fraser.mla@leg.bc.ca>, "Shane Simpson -- MLA -- Government of British Columbia." <shane.simpson.mla@leg.bc.ca>, "Shirley Bond -- MLA -- Government of British Columbia." <shirley.bond.mla@leg.bc.ca>, "Spencer Herbert -- MLA -- Government of British Columbia." <spencer.herbert.mla@leg.bc.ca>, "Stephanie Cadieux -- MLA -- Government of British Columbia." <stephanie.cadieux.mla@leg.bc.ca>, "Steve Thomson -- MLA -- Government of British Columbia." <steve.thomson.mla@leg.bc.ca>, "Sue Hammell -- MLA -- Government of British Columbia." <sue.hammell.mla@leg.bc.ca>, "Terry Lake -- MLA -- Government of British Columbia." <terry.lake.mla@leg.bc.ca>, "Vicki Huntington -- MLA -- Government of British Columbia." <vicki.huntington.mla@leg.bc.ca>

NORAHG

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, GOVERNMENT OFFICIALS, AND THE MEDIA, NATION-WIDE ACROSS CANADA, THE UNITED STATES, AND OVERSEAS.

FORCE OF NATURE IS THE BRAINCHILD OF WILLIAM H. GATHERCOLE AND HIS ENTOURAGE. NORAH G IS ACTUALLY AN ACRONYM FOR THE STABLE OF ANONYMOUS PRODUCERS AND WRITERS THAT CONTRIBUTE TO THIS E-NEWSLETTER AND HAVE NOW REPLACED MR. GATHERCOLE. THEY CONSIST OF PEOPLE FROM THE FOLLOWING INDUSTRIES : DISTRIBUTION, FERTILIZER, GOLF, LAWN CARE, MANUFACTURING, MUNICIPAL, NURSERY, AND ORCHARD. MANY OF THESE PEOPLE ARE LEADERS IN THEIR OWN INDUSTRIES. 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 ! FORCE OF NATURE MAY SOMETIMES BE VERY IRREVERENT AND FEARLESS WITH THESE E-NEWSLETTERS. MR. GATHERCOLE IS NOW RETIRED FROM FORCE OF NATURE, ALTHOUGH HIS NAME CONTINUES TO APPEAR AS THE FOUNDER.

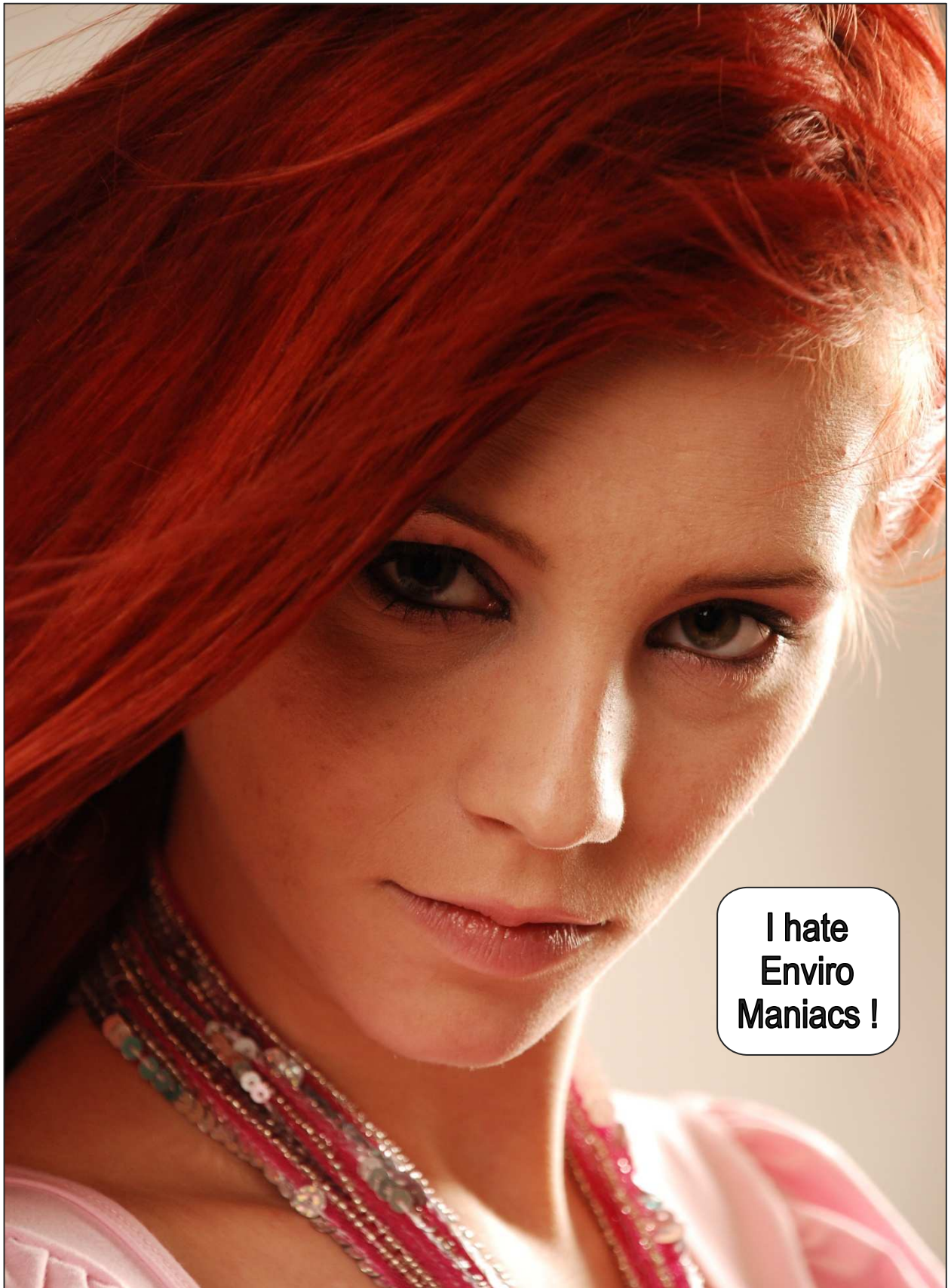
WILLIAM H. GATHERCOLE IS A PRINCIPAL FOUNDER OF THE MODERN PROFESSIONAL LAWN CARE INDUSTRY IN BOTH ONTARIO AND QUEBEC. HE HOLDS A DEGREE IN HORTICULTURE FROM THE UNIVERSITY OF GUELPH, AND ANOTHER PURE AND APPLIED SCIENCE DEGREE FROM MCGILL UNIVERSITY. HE HAS WORKED IN VIRTUALLY ALL ASPECTS OF THE GREEN SPACE INDUSTRY, INCLUDING GOLF AND PROFESSIONAL LAWN CARE, AND HAS SERVED IN PUBLIC AFFAIRS, WORKPLACE SAFETY, AND ENVIRONMENTAL COMPLIANCE. MR. GATHERCOLE HAS SUPERVISED, CONSULTED, PROGRAMMED, AND/OR OVERSEEN THE EXECUTION OF HUNDREDS OF THOUSANDS OF PEST CONTROL APPLICATIONS IN THE URBAN LANDSCAPE. HE HAS TRAINED, INSTRUCTED, AND CONSULTED WITH THOUSANDS OF TURF MANAGERS AND TECHNICIANS. MR. GATHERCOLE HAS ALSO BEEN AN AGRICULTURAL AGRONOMIST. FOR MANY YEARS, MR. GATHERCOLE WAS A CONTRIBUTING COLUMNIST FOR TURF & RECREATION MAGAZINE, CANADA'S TURF AND GROUNDS MAINTENANCE AUTHORITY.

MR. GATHERCOLE HAS FOLLOWED 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 HIS COLLEAGUES, LEGAL ACTION AGAINST THE PROHIBITION OF PEST CONTROL PRODUCTS IN THE TOWN OF HUDSON, QUEBEC. FOR FIFTEEN YEARS, THE STRATEGIES DESIGNED AND IMPLEMENTED BY MR. GATHERCOLE AND HIS COLLEAGUES GUARANTEED THE CONTROL OF ENVIRO-TERROR FOR THE ENTIRE MODERN GREEN SPACE INDUSTRY ACROSS CANADA. ALTHOUGH HE CAN BE ACCUSED OF BEING ANTI-ENVIRONMENT-MOVEMENT, HE IS, IN FACT, SIMPLY A STRONG ADVOCATE FOR THE MODERN 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 !)

FORCE OF NATURE IS THE INSTRUMENT OF NATIONAL ORGANIZATION RESPONDING AGAINST HUE THAT HARM THE GREEN SPACE INDUSTRY (NORAHG) BY CONCOCTING STATEMENTS AND ACTIVITIES SEEKING TO PROHIBIT FEDERALLY LEGAL, SCIENTIFICALLY SAFE, AND TOTALLY IRREPLACEABLE CONVENTIONAL PEST CONTROL PRODUCTS. ENVIRO-MANIAC-CULPRITS ARE IDENTIFIED ON THE BASIS OF THEIR STATEMENTS, ACTIVITIES, AFFILIATIONS, AND WHEREABOUTS. EVEN THOUGH EACH ENVIRO-MANIAC-CULPRIT IS A MISGUIDED ADVERSARY, EACH STILL DESERVES OUR RESPECT. THE TERMS MANIAC, CULPRIT, TERRORIST, OR BASTERD ARE NOT ACCUSATIONS OF ANY LEGAL WRONG-DOING. FORCE OF NATURE IS SIMPLY HOLDING CULPRITS ACCOUNTABLE FOR CONSPIRING TO CHANGE PUBLIC POLICIES THAT TERRORIZE AND THREATEN THE GREEN SPACE INDUSTRY. FORCE OF NATURE BELIEVES THAT THE PRETENTIOUS PROHIBITIONIST POLICIES OF THE ENVIRONMENTAL-TERROR-MOVEMENT IS LEADING TO LOSS OF REVENUES, BUSINESS FAILURES, BANKRUPTCY, AND UNEMPLOYMENT, INFLECTING DESPAIR AND DESTITUTION FOR THOUSANDS OF VICTIMS THROUGHOUT THE GREEN SPACE INDUSTRY. THE ACTIONS OF MANIAC-CULPRITS-TERRORISTS-BASTERDS IN THE MOVEMENT ARE VIEWED AS A FORM OF TERROR AGAINST THE GREEN SPACE INDUSTRY. THE INFORMATION PRESENTED IN FORCE OF NATURE HAS BEEN DEVELOPED FOR THE EDUCATION AND ENTERTAINMENT OF THE READER BY PROVIDING A SEQUENCE OF HISTORICAL EVENTS WITH COMMENTARY. ADDITIONALLY, FORCE OF NATURE INSPIRES PEOPLE TO BELIEVE THAT ENVIRONMENTAL TERRORISM CAN BE STOPPED ! 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. 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.

THE FOLLOWING FORCE OF NATURE DOCUMENTS ARE CURRENTLY AVAILABLE — • ALBERTA PROHIBITION • BRITISH COLUMBIA PROHIBITION • CANADIAN ASSOCIATION OF PHYSICIANS FOR THE ENVIRONMENT • MILLIONAIRE-CANCER-SOCIETY • CANADIAN ENVIRONMENTAL LAW ASSOCIATION • CONSEQUENCES • DAVID SUZUKI FOUNDATION • DDT AND POLITICIZED SCIENCE • DEATH AND THE ENVIRONMENTAL-TERROR-MOVEMENT • ENVIRO-MONEY • ENVIRONMENTAL TERRORISTS UNMASKED • FERTILIZER-TERROR IS NEXT • JUNE IRWIN, THE CLOWN OF JUNK SCIENCE • KAZIMIERA JEAN COTTAM • LANDSCAPE TRADES CAPITULATE • NEW BRUNSWICK PROHIBITION • NOVA SCOTIA PROHIBITION • ONTARIO PROHIBITION • ORGANIC FERTILIZERS • PESTICIDE FREE BC • PETS AND LAWN CARE CHEMICALS • PRINCE EDWARD ISLAND PROHIBITION • QUEBEC PROHIBITION • RACHEL CARSON, THE QUEEN OF JUNK SCIENCE • SALMON ARM BC PROHIBITION • THE 9/11 ERA OF THE GREEN SPACE INDUSTRY • THE FAILURE OF INTEGRATED PEST MANAGEMENT • THE LOOMING GOLF INDUSTRY SHIPWRECK • THE INDUSTRY STRIKES BACK • THE MISCONCEPTIONS ABOUT CANCER • THE NATIONAL ANNIHILATION OF THE MODERN GREEN SPACE INDUSTRY • THE WISDOM OF BILL BELL • THE WISDOM OF DRYSDALE • THE WISDOM OF HEALTH CANADA • THE WISDOM OF HOLLAND • THE WISDOM OF LOWES • THE WISDOM OF MAINS • THE WISDOM OF THE SOLOMONS • 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 ! FORCE OF NATURE IS TOTALLY INDEPENDENT OF ANY TRADE ASSOCIATION OR BUSINESS OPERATING WITHIN THE GREEN SPACE INDUSTRY. DON'T THANK US. IT'S A PUBLIC SERVICE. AND WE ARE GLAD TO DO IT.

The Whole Truth from an Independent Perspective



The Whole Truth from an Independent Perspective