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DECEMBER 30TH, 2011

LETTER OF COMPLAINT — MEDIA RELEASE

ONTARIO MINISTRY OF THE ENVIRONMENT

ENVIRONMENTAL SCIENCES AND STANDARDS DIVISION
STANDARDS DEVELOPMENT BRANCH
PESTICIDES MANAGEMENT SECTION

RE: TURFMAIZE LIQUID BIO-HERBICIDE CORN GLUTEN WEED PREVENTER (a.k.a. LIQUID CORN GLUTEN)

Without prejudice.

The Ontario Ministry of the Environment is proposing to add Liquid Corn Gluten as a Class 11 Green Alternative Pesticide ( a classification for biopesticides and certain lower risk pesticides ) for cosmetic uses under the provincial ban of conventional pest control products.

This letter is a complaint concerning THREE issues related to Liquid corn Gluten —

- The LOW EFFICACY of Liquid Corn Gluten
- The CONFLICT-OF-INTEREST of the Government of Ontario
- The ALLEGED LOWER RISK of Liquid Corn Gluten

#### The LOW EFFICACY of Liquid Corn Gluten

The Government of Ontario ALLEGES that Liquid Corn Gluten is somehow a NEW active ingredient.

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In fact, the ONLY SUBSTANTIAL CHANGE regarding this new product is its formulation, which is LIQUID — prior formulations were GRANULAR.

Despite the new formulation, Liquid Corn Gluten will still only provide LOW EFFICACY and POOR/NON-EXISTENT RESULTS in a weed control program.

According to the proposed label, Liquid Corn Gluten is recommended for ...

« ... the INHIBITION of dandelion and crabgrass ( smooth and large ) and white clover seed germination in lawns where established perennial ryegrass and Kentucky bluegrass predominate. »

Corn Gluten merely « *inhibits* » or « *suppresses* » certain weeds.

In general, « *suppression* » occurs when LESS THAN FIFTY PER CENT of the damaging weed population is killed by a single application of herbicide.

« Suppression » is NOT the same as « control ».

FULL EFFECTIVE « control » can only be attained with CONVENTIONAL pest control products where a VERY HIGH PER CENT of damaging weeds are killed.

In many circumstances, Corn Gluten is INEFFECTIVE and INADEQUATE.

In fact, U.S. university research indicates that Corn Gluten DOES NOT CONTROL ANY weeds in ANY trials under ANY circumstances.

There is NO evidence of pre- or post-emergence weed control.

It is INCONCEIVABLE that the Government of Ontario would approve the use of a herbicide with such a LOW LEVEL of efficacy.

At best, Corn Gluten is a VERY WEAK HERBICIDE that MAY have some uses for do-it-yourself home-owner weed management.

Unfortunately, Corn Gluten CANNOT BE TAKEN SERIOUSLY as a COMMERCIAL product for use in the PROFESSIONAL LAWN CARE INDUSTRY.

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Most assuredly, the Government of Ontario would NEVER IN A MILLION YEARS consider approving this type of product for use in the AGRICULTURE INDUSTRY.

It appears as though the Government of Ontario is using the PROFESSIONAL LAWN CARE INDUSTRY as the DUMPING-GROUND for BOGUS INFERIOR Green Alternative Pesticides.

Why is the Government of Ontario SQUANDERING and WASTING RESOURCES on a product that, essentially, DOES NOT WORK ?!?!

For more information about Corn Gluten Herbicide, please go to the following link ...

http://pesticidetruths.com/toc/corn-gluten-meal-herbicide-dismal-failure/

#### The CONFLICT-OF-INTEREST of the Government of Ontario

In 2010, the Government of Ontario, through the Ministry of Environment, provided an initial 480-THOUSAND-DOLLARS to the Agricultural Adaptation Council (AAC) to establish the Cosmetic Use Pesticide Research and Innovation (CUPRI) funding to investigate so-called « new approaches » to pest control.

The Environmental Factor BENEFITED from this program with a 30-THOUSAND-DOLLAR GRANT.

The GRANT was provided for « *research* » into the efficacy of Liquid Corn Gluten in controlling weeds.

Although The Environmental Factor is the REGISTRANT for this product, it is NOT a research organization.

Moreover, why is the Government of Ontario SQUANDERING and WASTING RESOURCES on a product that is, essentially, DISMAL FAILURE ?!?!

Unfortunately, by providing the GRANT, the Government of Ontario GAINED A VESTED FINANCIAL INTEREST in Liquid Corn Gluten.

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In essence, the Government of Ontario is in SEVERE CONFLICT-OF-INTEREST BY DIRECTLY PARTICIPATING in the development of Green Alternative Pesticides like Liquid Corn Gluten.

For more information concerning The Environmental Factor, please go to the following link ...

http://pesticidetruths.com/toc/the-environmental-factor/

#### The ALLEGED LOWER RISK of Liquid Corn Gluten

According to the Government of Ontario, bio-pesticides like Liquid Corn Gluten have characteristics such as « *low toxicity to humans, minimal impact to the environment, and act in a non-toxic way in controlling intended pests.* »

Bio-pesticides are supposed to be « *lower-risk green alternative to conventional turf herbicides* ».

However, the proposed label for Liquid Corn Gluten contains the following statements ...

« May cause SENSITIZATION. TurfMaize Liquid Bioherbicide Corn Gluten Weed Preventer should not be applied if a member of the household has a SENSITIVITY OR ALLERGY TO CORN. May IRRITATE EYES AND SKIN. Avoid contact with skin, eyes or clothing. May cause respiratory irritation. Avoid breathing spray mist. Do not re-enter or allow re-entry of adults, children or domestic pets into treated areas until the spray is dried. »

Corn Gluten is ALLEGED to be a so-called « *lower-risk green alternative to conventional turf herbicides* ».

This is NOT true.

In many ways, Corn Gluten is HIGH-RISK and MORE TOXIC when compared to conventional turf herbicides.

Contact with Corn Gluten may cause TEMPORARY MILD IRRITATION.

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Corn Gluten may cause SENSITIZATION TO THE SKIN AND EYES.

Corn Gluten may ADVERSELY AFFECT people with known corn allergies — they are advised by the label to avoid exposure.

Why is the Government of Ontario SUPPORTING a product that is, essentially, HIGH-RISK and MORE TOXIC ?!?!

For more information regarding Green Alternative Pesticides, please go to the following link ...

http://pesticidetruths.com/toc/green-alternatives-bogus-dismal-failures/

#### Conclusion

Overall, Green Alternative Pesticides like Liquid Corn Gluten are INEFFECTIVE, INADEQUATE, HIGH-RISK, MORE TOXIC, and even STUNNINGLY EXPENSIVE!

In fact, there are NO viable, efficacious, economical, or low-risk alternatives to replace conventional pest control products.

Green Alternative Pesticides like Liquid Corn Gluten are BOGUS and DISMAL FAILURES — they DO NOT WORK and they are NOT INNOVATIVE products.

Liquid Corn Gluten is NOT SAFER, NOT BETTER, and NOT MORE EFFECTIVE.

The Government of Ontario is SQUANDERING and WASTING both MONEY and RESOURCES on this product.

It is recommended that the Government of Ontario RE-ASSESS its programs so that EFFICACEOUS, INNOVATIVE, and GENUINELY LOW-RISK Green Alternative Pesticides are brought to market.

WILLIAM H. GATHERCOLE AND NORAH G



#### WILLIAM H. GATHERCOLE AND NORAH G

**NORAHG** is the **N**ational **O**rganization **R**esponding **A**gainst **H**UJE that seek to harm the **G**reen space industry.

NORAHG morally represents the VAST SILENT MAJORITY of people associated with turf and ornamental plant maintenance who are OPPOSED to Anti Pesticide PROHIBITION and the CLOSURE or ABANDONMENT of green spaces under the RIDICULOUS PRETEXT of somehow « saving » the environment.

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.

NORAHG was the brainchild of William H. Gathercole and his colleagues in 1991. Mr. Gathercole is now retired, although his name continues to appear as founder.

We are living in the DARK AGE OF ANTI PESTICIDE TERRORISM where sound science is trumped by JUNK SCIENCE and UNVERIFIABLE SECRET EVIDENCE through FABRICATION, INNUENDO, and INTERNET RUMOUR — scientific research PROVES that pest control products CAUSE NO HARM and can be USED SAFELY.

HUJE are enviro-lunatics, anti-pesticide activists, and lawn-haters, who particularly DESPISE the golf industry. There is NO RECOURSE but LITIGATION against these HUJE, as well as CANCELLATION of GOVERNMENT GRANTS and REVOCATION of the TAX EXEMPT STATUS of their organizations.

NORAHG manages The Library of Force Of Nature Reports and References for all Anti Pesticide Terrorist Acts of Subversion.

The NORAHG of Library Force Of Nature Reports and References is a VAST ARCHIVE of DOCUMENTS, AUDIO CLIPS, and VIDEOS on ALL Anti Pesticide Activities has been made AVAILABLE through NORAHG to anyone interested in LITIGATION.

These ARCHIVES contain names, statements, activities, and affiliations of ALL Anti Pesticide Vermin, including Government Officials, as well as Charitable Prohibition-Terrorist-Organizations that DO NOT DESERVE ANY Tax Exempt Status.

Interested parties need only to send NORAHG their REQUESTS for ANY INFORMATION needed in the War Against Lunatic Terrorist PROHIBITION.

Anti-Pesticide Activists are advised that all names, statements, activities, and affiliations have been ARCHIVED for eventual CRIMINAL CHARGES.

When criminal charges for FRAUD and CONSPIRACY are laid, legal experts say that there is sufficient information to lead to a SUCCESSFUL PROSECUTION!

For more information, please go to The Pesticide Truths Web-Site that contains History, Links, Audios, Videos, and Media News Reports right off the press ...

http://pesticidetruths.com/

and

http://pesticidetruths.com/toc/