

# Analysis and Commentary On Canadian Cancer Society Presentation To Kamloops Council

## Part 1



# **The Wisdom of John J. Holland**



## **Analysis and Commentary On Canadian Cancer Society Presentation To Kamloops Council**

**June 12<sup>th</sup>, 2012**

**John J. Holland**

**Media Release**

**Selected and Adapted Excerpts**

John J. Holland is Communications Director for Integrated Environmental Plant Management Association of Western Canada ( IEPMA ). He is Canada's most eloquent and intelligent writer on the subject of public policy and pest control products.

# The Wisdom of a REAL Expert



Analysis and Commentary  
on the June 12, 2012 Presentation  
to Kamloops Council by the Canadian  
Cancer Society's Jerilynn Maki

By John J. Holland,  
Kelowna, BC,  
June 19, 2012

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Jerilynn Maki, the BC-Yukon Canadian Cancer Society's Health Promotion Coordinator for the Southern Interior Region, made a presentation to Kamloops Council on June 12.

While Ms Maki is no doubt sincere in her beliefs, what should have been a science-based presentation became one that is BOTH SHORT ON FACTS AND REplete WITH MISINFORMATION — and is thus MUCH WORSE THAN NO PRESENTATION AT ALL.

In the words of Ms Maki, « *the work that we do is based on scientific research and what we are finding is that there is a growing body of evidence that link exposure to pesticides to certain kinds of cancer* » ( « *a growing body of evidence* » is a much-loved term that the CCS and others opposed to pesticides have become very fond of using WHEN THEY COME UP SHORT ON THE ACTUAL SCIENCE ).

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## NO Pesticides Are Human Carcinogens

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After previously detailing many scientific sources from which she claims the CCS receives its information, Ms Maki maintained that her organization's stance on « *cosmetic* » pesticides « *aren't our opinions* ».

Although Ms Maki claims that the CCS position isn't « *our opinion* », it also certainly isn't that of Health Canada, the US Environmental Protection Agency, the American Cancer Society, the British Cancer Society, and many others.

The International Agency for Research on Cancer ( IARC ), for example, is on Ms Maki's list.

But a recent report from the IARC states that —

*VERY FEW currently available pesticides are ESTABLISHED EXPERIMENTAL CARCINOGENS, and NONE is an established HUMAN CARCINOGEN. Studies in humans have FAILED TO PROVIDE CONVINCING EVIDENCE of an increased risk, even in heavily exposed groups.*

International Agency for Research on Cancer, 2007, Attributable Causes of Cancer in France in the Year 2000, IARC Working Group Report, Volume 3

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## 23 Million Pages of Scientific Studies

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The CCS position is, on the other hand, CONGRUENT WITH THOSE OF ALL THE ANTI-PESTICIDE AND NON-SCIENCE-BASED ORGANIZATIONS in Canada.

Ms Maki speaks of, and one of her Power Point slides highlights, the following —

*Over 100 STUDIES have linked pesticide exposure to both adult and childhood cancers.*

The findings of this LIMITED NUMBER OF STUDIES can be challenged by reference to the following, provided by Health Canada's Pest Management Regulatory Agency ( PMRA ) —

*We estimated that just proprietary studies that are submitted to us, which we keep on file, AMOUNTED TO ABOUT 23 MILLION PAGES OF SCIENTIFIC STUDIES that are used to support the decisions that we make on pesticides, which is FAIRLY SIGNIFICANT. [ Emphasis added ]*

Jason Flint ( Director, Policy and Regulatory Affairs Division, Communications and Regulatory Affairs Directorate ), January 17, 2012, before the BC Special Committee on Cosmetic Pesticides



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## Cherry-Picked Weak Epidemiological Studies

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Furthermore, what Ms Maki FAILED TO EXPLAIN is that her 100 STUDIES are ALL EPIDEMIOLOGICAL OBSERVATIONAL STUDIES WITH VERY WEAK LINKS between pesticides and disease.

She further stated that *« once all of these studies have been evaluated, we have what we call the weight of the evidence »*, with the obvious implication being that the *« weight »* is against the use of pesticides, and therefore *« we are saying we have enough evidence now that we want people to start taking precautions »*.

This statement could be true if the selected ( *« cherry-picked »* ) weak epidemiological studies were the only evidence submitted.

As the PMRA explains —

*Epidemiology studies identify associations rather than causation, and are examined IN CONJUNCTION WITH well conducted toxicity studies that are specifically designed to elicit toxic effects over a series of dose levels.*

*These animal toxicity data are assessed to determine if there is any biological basis for the potential associations noted in epidemiology studies.*

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*The examination of animal toxicity data 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 PMRA undertakes this kind of assessment to supplement information about 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.*

« *Answers to Additional Questions for Health Canada (PMRA)* », submitted by the BC Special Committee on Cosmetic Pesticides, April 30, 2012 [ Emphasis added ]



## Our Hero !



**John J. Holland**    iepma@shaw.ca

John J. Holland is Communications Director for Integrated Environmental Plant Management Association of Western Canada ( IEPMA ).

He is Canada's MOST ELOQUENT and INTELLIGENT WRITER on the subject of public policy and pest control products.

In Letters To The Editor, Holland has EFFECTIVELY and FREQUENTLY SPOKEN OUT AGAINST Anti-Pesticide Activists.

The Integrated Environmental Plant Management Association of Western Canada ( IEPMA ), in conjunction with its membership, has been VERY decisive regarding the CONSPIRACY to PROHIBIT pest control products in British Columbia.

After all, conventional pest control products are HEALTH-CANADA-APPROVED, FEDERALLY-LEGAL, SCIENTIFICALLY-SAFE, and PRACTICALLY-NON-TOXIC.

The Integrated Environmental Plant Management Association has correctly recognized that this is a BEACH-HEAD in the FIGHT FOR VICTORY against the ANTI-PESTICIDE CONSPIRACY to PROHIBIT pest control products in British Columbia.

Here are Mr. Holland's career highlights and accomplishments —

Fields of study — Honours BA in History and Geology, post-graduate work in History

Notable work — owner of a large professional lawn and tree care company in the Okanagan Region of British Columbia ( 1983 — 2004 ) — supervisor of a structural pest control company ( 1979 — 1982 )

Special contributions — Communications Director of Integrated Environmental Plant Management Association of Western Canada ( 2007 — present ) — Vice-President of Integrated Environmental Plant Management Association of Western Canada ( 1998 — 2007 ) — President of Environmental Standards Association ( 1985 — 1994 ) — Co-Founder of Environmental Standards Association, the fore-runner to IEPMA ( 1984 )

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Here are some examples of Holland's wisdom —

*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.*

*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 pest control products. Not being a scientist, I have always been guided by the work of those who are the actual experts.*

*As you may be aware, there are also numerous MISLEADING — or UN-SCIENTIFIC — 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. The information used by those like the OCFP 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 ).*

*CAPE and Forman also seem to believe, with NO SCIENTIFIC PROOF, that all synthetic pesticides cause cancer.*

*Despite popular belief, Canadian Cancer Society, which has taken such a large and activist role against pesticides, is NOT A SCIENTIFIC ORGANIZATION. Canadian Cancer Society is a volunteer advocacy and fund-raising association, with NOT A SINGLE SCIENTIST on staff with pesticide expertise.*

*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.*

*It must first be noted that there is NO SUCH THING as « full scientific certainty ». ONE CANNOT PROVE A NEGATIVE. It is IMPOSSIBLE to prove scientifically that pest control products — or any substance, including water- — could NEVER harm anything or any-*

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*one under ANY circumstances. There is also NO PROOF of « environmental degradation » caused by what are erroneously termed « cosmetic » pest control products.*

*Municipal and provincial governments and even health-related professional organizations have been taking advice on pesticides from those who are THE LEAST QUALIFIED TO PROVIDE IT. These governments also ignore those who have THE ESSENTIAL EXPERTISE, such as Health Canada's Pest Management Regulatory Agency ( PMRA ).*

*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.*

*Proper weed control on turf HELPS PREVENT SLIPPING INJURIES by eliminating broad-leaved weeds. [ ... ] the Precautionary Principle dictates that, with the choice between treating and not treating, the decision for proper weed control must be made. Therefore, turf pest control products SHOULD NOT BE PROHIBITED.*

*There are NO efficacious or cost-effective alternatives to the conventional products being banned. Due to their POOR PERFORMANCE, the « alternative » products left have to be applied more often, with more applicator visits, dramatically increasing an applicator's environmental foot-print — there is no lack of certainty about this.*

*There is SUBSTANTIAL AND UNDENIABLE PROOF for both « serious » and « irreversible » harm to employees and families of applicator companies ( and to the companies themselves ). In Quebec and Ontario, many companies have been driven out of business — there is no lack of any certainty about this. In spite of the claims of activists to the contrary, THOUSANDS OF EMPLOYEES HAVE LOST THEIR JOBS, and they and their families are suffering the consequences, health and otherwise — there is no lack of certainty about this.*


*While there have been numerous studies published on the effects of pesticides on human health, the VAST MAJORITY have shown that there are NO DISCERNABLE HEALTH PROBLEMS.*

*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.*









**Anti-Pesticide Terrorists  
have the means to LIE, but  
no REAL FACTS to LIE with**