

PRECAUTIONARY PRINCIPLE

Part 2



FORCE OF NATURE

THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE from
National Organization Responding Against HUJE that seek to harm the Green Space Industry (NORAHG)

In the 9|11 Era of Anti-Pesticide Terrorism ...

The CO-OPTED ANTI-PESTICIDE VERSION of the Precautionary Principle

- Anti-Pesticide Activists have CO-OPTED A DIFFERENT VERSION of the Precautionary Principle.
- The MORE WIDELY-ACCEPTED VERSION, called the Rio Declaration, actually states that a LACK OF FULL SCIENTIFIC CERTAINTY shall not be used as a reason for postponing cost-effective measures.
- The CO-OPTED ANTI-PESTICIDE VERSION of the Precautionary Principle ...
 - ... is an ILLUSORY and UNATTAINABLE GOAL — nothing is fully established scientifically, EVER — science is a PERPETUAL ARGUMENT.
 - ... allowed itself to be applied to VIRTUALLY ANYTHING, for almost ANY REASON.
 - ... states that measures be taken even if CAUSE-AND-EFFECT relationships are not fully established scientifically.
- The Precautionary Principle actually RULES AGAINST ENACTING THE PROHIBITION OF PEST CONTROL PRODUCTS, particularly as it applies to human health and well-being, as well as the environment.

The Wisdom of John J. Holland



Precautionary Principle

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John J. Holland

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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 John J. Holland



*Anti-Pesticide Activists have CO-OPTED a
DIFFERENT VERSION of the Precautionary Principle*

Misunderstanding the Precautionary Principle

Anti-Pesticide Organizations (including Canadian Cancer Society) CO-OPTED A DIFFERENT VERSION of the Precautionary Principle.

It is called the Wingspread Statement on the Precautionary Principle, which was formulated in 1998 by a small group of environmentalists.

The Wingspread Statement has become very popular with Anti-Pesticide Activists who MISUNDERSTAND the Precautionary Principle.

It is — at the same time — both MORE AMORPHOUS and MORE INCLUSIVE than the MORE WIDELY-ACCEPTED VERSION called the Rio Declaration.

The Wisdom of a REAL Expert



*The Rio Declaration states that LACK
OF FULL SCIENTIFIC CERTAINTY shall
not be used as a reason for postponing
cost-effective measures*

The Rio Declaration

The MOST WIDELY-ACCEPTED VERSION of the Precautionary Principle is the United Nations Rio Declaration of June 1992.

The Rio Declaration states —

*<< Where there are THREATS OF SERIOUS OR IRREVERSIBLE
DAMAGE, LACK OF FULL SCIENTIFIC CERTAINTY SHALL NOT be used
as a reason for postponing cost-effective measures to pre-
vent environmental degradation. >>*

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*The CO-OPTED ANTI-PESTICIDE VERSION of the
Precautionary Principle states that measures be
taken even if CAUSE-AND-EFFECT relationships
are not fully established scientifically*

The Wingspread Statement

The Wingspread Statement, the CO-OPTED ANTI-PESTICIDE VERSION of the Precautionary Principle, was released by Enviro-Lunatics in January 1998 —

*<< When an activity raises THREATS OF HARM TO HUMAN
HEALTH OR THE ENVIRONMENT, precautionary measures should
be taken even if some CAUSE-AND-EFFECT relationships are
NOT FULLY ESTABLISHED SCIENTIFICALLY. >>*

The Wisdom of a REAL Expert



The Wingspread Statement (continued)

« *Threats of serious or irreversible damage* » — which appears in the the United Nations Rio Declaration — was DELETED by Anti-Pesticide Activists.

« *Threats of harm to human health or the environment* » has been ADDED to the Wingspread Statement, the CO-OPTED ANTI-PESTICIDE VERSION of the Precautionary Principle.

The Wingspread Statement allowed itself to be applied to VIRTUALLY ANYTHING, for almost ANY REASON.

What is seldom mentioned is ANOTHER CLAUSE from the Wingspread Statement, as follows —

<< *The process of applying the Precautionary Principle must be OPEN, INFORMED AND DEMOCRATIC and must include potentially affected parties.*

It must also involve an examination of the full range of alternatives, including NO ACTION. >>

The Wisdom of John J. Holland



*The CO-OPTED ANTI-PESTICIDE VERSION of
the Precautionary Principle is an ILLUSORY
and UNATTAINABLE GOAL*

Nothing is fully established scientifically, EVER

Science is a PERPETUAL ARGUMENT

Stewart Brand is a renowned environmentalist, creator and former editor and publisher of The Whole Earth Catalog.

In 2009, Stewart Brand wrote about the Wingspread Statement in his book An Ecopragmatist Manifesto —

*<< They had me at « precautionary », worried me at
« some CAUSE-AND-EFFECT », and lost me at « FULLY ESTAB-
LISHED SCIENTIFICALLY ».*

The Wisdom of a REAL Expert



That is an ILLUSORY, UNATTAINABLE GOAL.

NOTHING IS FULLY ESTABLISHED SCIENTIFICALLY, EVER — not gravity, not Darwinian evolution, not the safety of peanut-butter-and-jelly sandwiches.

SCIENCE IS A PERPETUAL ARGUMENT. >>

NO Lack of Any Certainty

There is NO LACK OF ANY CERTAINTY concerning « *threats of serious or irreversible damage* » to the employees and families of Professional Lawn Care companies.

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 ANY CERTAINTY about this.

There are NO efficacious or cost-effective alternatives to the conventional products being banned.

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DISMAL FAILURE of Green Alternatives

Due to their poor performance, Green Alternative products have to be applied MORE OFTEN, with MORE APPLICATOR VISITS, dramatically INCREASING AN APPLICATOR'S ENVIRONMENTAL FOOT-PRINT.

There is NO LACK OF ANY CERTAINTY about this.

Therefore, the Precautionary Principle RULES AGAINST ENACTING THE PROHIBITION OF PEST CONTROL PRODUCTS, particularly as it applies to human health and well-being, as well as the environment.

*The Precautionary Principle actually dictates
that pest control products NOT BE PROHIBITED*

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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)

John J. Holland (continued)

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 CAN-NOT 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 down-played 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-

John J. Holland (continued)

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.

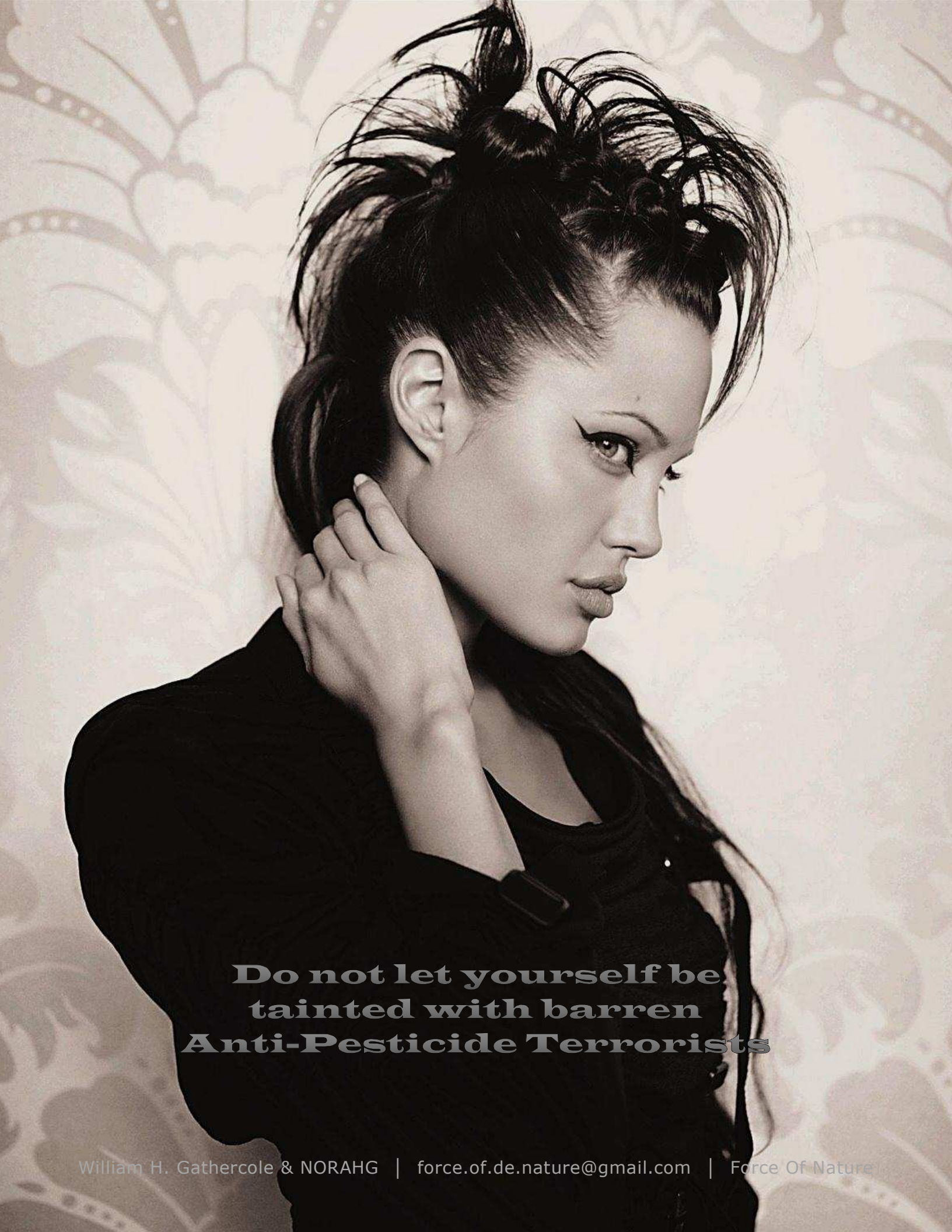
It must first be noted that there is NO SUCH THING as « full scientific certainty ». ONE CANNOT PROVE A NEGATIVE. It is IMPOSSIBLE to prove scientifically that pest control products — or any substance, including water — could NEVER harm anything or anyone under ANY circumstances. There is also NO PROOF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

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.



**Do not let yourself be
tainted with barren
Anti-Pesticide Terrorists**