

scientifically-reported concerning the safety of quintozene, to both the environment observers have commented that it is INCOMPREHENSIBLE that Canadian Golf Superintendents Association would SQUANDER its resources and DAMAGE its CREDIBILITY in order to SAVE QUINTOZENE by CONCOCTING a NON-EXISTENT CRISIS

VIII SafeAssociation

Quintozene Crisis?

What Crisis?

June 24th, 2010

Health Canada

Re-evaluation Decision RVD2010-06 Quintozene

Selected and adapted excerpts



QUINTOZENE FUNGICIDE RE-EVALUATION DECISION BY HEALTH CANADA

ACCORDING TO PEST MANAGEMENT REGULATORY AGENCY OF HEALTH CANADA -

After a re-evaluation of the fungicide quintozene, Pest Management Regulatory Agency of Health Canada (PMRA), under the authority of the Pest Control Products Act (PCPA) and Regulations, is granting continued registration of certain uses while requiring a PHASE-OUT of other uses of quintozene products for sale and use in Canada.

10 Sarade Association

Products containing quintozene used on COLE CROPS and for ORNAMENTAL BULB DIP TREATMENTS do NOT pose unacceptable risk to human health or the environment, and have an agricultural value when used according to the label directions.

All other uses of quintozene are being phased-out due to the health and / or environmental concerns. All turf and ornamental uses are phased-OUT.

BACKGROUND INFORMATION FROM AN INDEPENDENT PERSPECTIVE —

(CGSA) leaders and staff decided to SAVE QUINTOZENE.

CGSA leaders and staff decided to CONCOCT A QUINTOZENE CRISIS.

MISGUIDED, MISLEADING, and INCOMPETENT.

CANADIAN GOLF SUPERINTENDENTS ASSOCIATION Unsubstantiated Allegations Concerning the Impact Caused by the Phase-Out of Quintozene Fungicide

ACCORDING TO PEST MANAGEMENT REGULATORY AGENCY OF HEALTH CAN-ADA, comments regarding the value of quintozene were received from various stake-holders.

Over 200 letters were received from representatives of turfgrass and golf associations. Most blindly agreed with the CGSA SUBMISSION of March 23rd, 2009,

Trade Associa

ACCORDING TO THE MISGUIDED AND MISLEADING CGSA SUBMISSION -

Repeat applications of alternative active ingredients would be required to provide a prolonged period of protection equivalent to that of one application of quintozene.

ACCORDING TO THE MISGUIDED AND MISLEADING CGSA SUBMISSION -

Quintozene is a cost effective pest management tool for turf management.

Its loss as a turf pest management tool will result in a greater damage to turf from Snow Molds.

ACCORDING TO THE MISGUIDED AND MISLEADING CGSA SUBMISSION —

Damage to turf from Snow Molds will result in lost income as a direct result of -

• a reduced period of playability to greens and tees.

additional turf maintenance costs.

• an increase in pesticide expenditures — the registered alternative products to the quintozene products are more costly, and will require more than one application. [Wrong!]

BACKGROUND INFORMATION FROM AN INDEPENDENT PERSPECTIVE -

Trade Ass

ACCORDING TO THE MISGUIDED AND MISLEADING CGSA SUBMISSION —

Quintozene is needed for rotation with registered alternative active ingredients with different Modes of Action to delay the development of resistance.

Most of the recently-registered alternative active ingredients to quintozene have a SINGLE-SITE mode of action.

Greater use of active ingredients with a single-site mode of action will increase the risk of developing resistance.

ACCORDING TO THE MISGUIDED AND MISLEADING CGSA SUBMISSION —

Quintozene acts as a contact fungicide — this is critical for control of Snow Molds as ALTERNATIVE systemic fungicides will be less effective since turf is dormant when these pests are active.

ACCORDING TO PEST MANAGEMENT REGULATORY AGENCY OF HEALTH CAN-ADA ...

... viable ALTERNATIVE active ingredients to quintozene are currently registered for the control of turf diseases.

BACKGROUND INFORMATION FROM AN INDEPENDENT PERSPECTIVE -

Canadian Golf Superintendents Association Misguided and Misleading Submission

March 23, 2009



John Worgan Director General Re-Evaluation Management Directorate Pest Management Regulatory Agency Tupper Building C390, Health Canada AL 6603B 2720 Riverside Drive Ottawa ON K1A 0K9

Re: Response to the Proposed Re-evaluation Decision Document of Quintoz-

Dear Mr. Worgan.

On behalf of the Canadian Golf Superintendents Association (CGSA), please accept our thanks for the opportunity to respond to the proposed re-evaluation decision document for quintozene, particularly as it relates to the use of this ingredient on golf course turf.

As you are no doubt aware, quintozene, the active ingredient in Terraclor Flowable, Terraclor 75WP and various fertilizer combination products, is an important tool for the control of snow mould [sic].

Snow mould [sic] is the most prevalent and potentially most devastating of all turf diseases in Canada.

Our long Canadian winters with abundant snow fall provide the perfect conditions for the development of snow mould [sic].

Therefore, golf courses across Canada must apply a fungicide or run the risk of facing significant turf loss once the snow recedes in the spring.

Turf loss or death results in unacceptable playing conditions which, in turn, results in lost revenue until such time as the conditions are repaired.

Repairing the turf requires time and significant, unbudgeted, input costs (seed, fertilizer, labour, etc.) to re-establish damaged areas.

Canadian Golf Superintendents Association Misguided and Misleading Submission

To summarize, excessive snow mould [sic] damage can have a dramatic economic impact on a golf course operation.

Further, the snow mould [sic] application is the most costly of all applications made during the season.

Therefore, it is imperative that golf course superintendents have reliable and cost effective options available. [The alternatives are unreliable ?!?!?!]

The quintozene-based products provide consistent disease control at prices that are significantly more cost effective than alternative chemistries currently registered for snow mould [sic].

The loss of quintozene will significantly limit the ability of some golf courses to adequately protect their courses from this disease. [?!?!?!]

Although there are alternative fungicides available to golf superintendents for snow mould [sic] control, quintozene is a major tool in a resistance management program. [?!?!?!]

Quintozene is one of only a few contact fungicides, and has a multi-site mode of action. [So what ?!]

Most of the newer fungicides have a single site mode of action. [?!?!?!]

If quintozene is no longer available these single site products will have to be used more often. [Wrong!]

This will cause a significant increase in the risk of resistance occurring.

The loss of quintozene would have dramatic financial and agronomic impacts on golf courses across Canada. [?!?!?!]

The CGSA respectfully requests that, as part of the re-evaluation process, the PMRA give consideration to the value of quintozene within the turf industry and to the continuation of its availability to the golf course sector.

Canadian Golf Superintendents Association Misguided and Misleading Submission

Letter drafted by Canadian Golf Superintendents

PLACE YOUR LETTERHEAD HERE

March 23, 2009

John Worgan Director General Re-evaluation Management Directorate Pest Management Regulatory Agency Tupper Building C390, Health Canada AL 6603B 2720 Riverside Drive Ottawa ON K1A 0K9

Re: Response to the Proposed Re-evaluation Decision Document of Quintoz-

Dear Mr. Worgan.

Please be advised that I have reviewed the letter submitted by the Canadian Golf Superintendents Association regarding the proposed re-evaluation decision document for Quintozene, and I concur with the submission of the CGSA.

Please include my support in your consideration of this decision.

Yours truly,

Your Name

Your Title

Your Company

THE VERY LAST TIME

This trade association has SEVERELY DAMAGED its credibility in Public Policy

to SAVE QUINTOZENE MISLEADING and INCOMPETENT

Observers have concluded Canadian Golf Superintendents Association are truly NOT COMPETENT ENOUGH concerning pest control products

WITHDRAWAL OF QUINTOZENE

It has also been withdrawn from the United States (U.S.) market.

QUINTOZENE CANCELLATION SCHEDULE

in Canada -

- plementation details of the decision for turf uses, which are as follows »
- product with turf use claims will be allowed to be imported, sold, or used in Canada. »

- « Canadian fungicide registrants will be responsible for replacing all end-use product labels with revised labels in the marketplace by December 31, 2010. »
- hands of users. »
- Canada Food Inspection Agency regarding appropriate timeframes for implementing this decision. We will provide an update as soon as this is available. »

DESCRIPTION OF QUINTOZENE

Quintozene is a FUNGICIDE that is also known as PCNB.

This active ingredient has been used in the Golf Industry in very affordable products like Terraclor and FF II.

Quintozene is a product that was brought to market fifty years ago, in the mid-Twentieth Century.

USE OF QUINTOZENE

as well as on the foliage.

Best results are obtained when quintozene is used in a PREVENTIVE application program.

It is sometimes recommended that quintozene be watered lightly as a SOIL DRENCH to wash the chemical down into the soil.

Turf managers have claimed to experience several problems when using quintozene, especially when maximum rates are used.

Here are some examples —

- Chemical root-pruning of desirable grasses, especially after continuous and repeated use for sev-
- Increased injury from specific diseases, such as Take-All
- SENSITIVITY TO RAIN AND MELTING-SNOW, leading to a poor DURATION OF CONTROL and the need for an increased frequency of application

EFFECTS OF CLIMATE ON QUINTOZENE

Rain and melting snow severely affect the performance of quintozene.

Snow Mold, in at least FOUR distinct periods of time —

- Early winter, just prior to the first permanent snow-fall
- Late in the fall, during periods of high rain fall

COMPARISON WITH MODERN FUNGICIDES

For the control of Snow Mold diseases, the DURATION OF FUNGICIDE CONTROL will be ADVERSELY AFFECTED when ...

- humid conditions are caused by UNCEASING RAIN and MELTING SNOW, or
- when foliage does not stop growing.

adequate control against the Snow Mold diseases.

The amount of fungicide applied late in the fall, JUST PRIOR TO THE FIRST PERMANENT SNOW FALL, must persist until snow-melt, and preferably until early spring.

Some fungicides will persist longer than others.

cially Instrata, will tend to REMAIN LONGER on foliage than older chemicals like quintozene.

In general, practical field experience has indicated that iprodione, and many other modern ingredients, have a LOW SENSITIVITY to rain or melting-snow, tolerating up to FIVE-INCHES of accumulated

On the other hand, quintozene may have a HIGHER SENSITIVITY to rain or melting snow, tolerating NO MORE THAN THREE-INCHES of accumulated rain.

ADVANTAGES OF QUINTOZENE

Some turf managers claim that quintozene provides a major advantage over other more conventional

for problems of disease resistance to the product.

It should be noted that the resistance of fungicides to Snow Mold diseases is a RARE occurrence, and it is UNLIKELY that ANY turf manager will EVER encounter resistance to any pest control product at

Some turf managers select quintozene because it is AFFORDABLE.

However, affordability is inconsequential once the problems associated with quintozene are put into

AMERICA'S DECISION REGARDING QUINTOZENE

In the United States, the Environmental Protection Agency (EPA) concluded that the risks when using quintozene were SUBSTANTIAL from an environmental standpoint.

The major concerns cited are [the EMPHASIS is our own.] ...

- Quintozene is PERSISTENT IN THE ENVIRONMENT, with aerobic and an anaerobic soil metabolism
- Quintozene BIOACCUMULATES in the aquatic food chain. It persists in the environment (half-life
- example, significant quintozene residues have been detected in regions where the product was never
- Quintozene is immobile in most soils, but potentially able to partition to organic matter in the soils, and move to surface water through erosion. Therefore, the surface water was FOUND MORE LIKELY TO BE CONTAMINATED.

The Environmental Protection Agency concluded that the re-registration of quintozene was acceptable provided that ALL TURF USES WERE TERMINATED.

It is not surprising that Pest Management Regulatory Agency of Health Canada (PMRA) followed with the same decision, by PROHIBITING the SALE and USE of quintozene beyond 2010.

CGSA ATTEMPT TO SAVE-QUINTOZENE

Incredibly, some trade associations have SQUANDERED an enormous amount of their resources in the

Here is an excerpt from the CGSA petition on March 23rd, 2009 –

- « [...] the snow mould [sic] application is the most costly of all applications made during the season. Therefore, it is imperative that golf course superintendents have reliable and cost effective options available. The quintozene-based products provide consistent disease control at prices that are [sic]. The loss of quintozene will significantly limit the ability of some golf courses to adequately protect their courses from this disease. »

- « The loss of auintozene would have DRAMATIC FINANCIAL AND AGRONOMIC IMPACTS ON GOLF COURSES ACROSS CANADA [?!?!]. »

« The CGSA respectfully requests that, as part of the re-evaluation process, the PMRA give consideration to the value of quintozene within the turf industry and to the continuation of its availability to the golf course sector. »

PUTTING FUNGICIDE USE INTO PERSPECTIVE

The CGSA may have EXAGGERATED the financial impact associated with the loss of quintozene.

Overall, fungicide usage on the golf course represents LESS THAN TEN PER CENT of a golf course CENT of the budget.

manpower and nutrients.

DEPENDENCE ON QUINTOZENE

It should also be noted that in Canadian regions that are severely prone to the development of Fusaproduct of choice — IN GRANULAR FORM.

Granular quintozene is applied with ordinary rotary or drop spreaders.

The DEPENDENCE of the Golf Industry on this formulation is a direct result of the REFUSAL of many turf managers to purchase and operate modern LIQUID spray application equipment.

The loss of quintozene will likely represent an opportunity for many turf managers to advance them-

After the complete withdrawal of quintozene, all fungicides available for the control of Snow Molds will need to be applied WITH A SPRAYER.

CGSA SQUANDERING OF RESOURCES ON QUINTOZENE

sirable turfgrasses, observers have commented that it is INCOMPREHENSIBLE that Canadian Golf Superintendents Association (CGSA) would SQUANDER its resources in order to SAVE-QUINTOZENE.

Observers have also pointed out that CGSA should devote its resources to more serious issues concerning pest control products, such as the imminent threat of a NATION-WIDE PROHIBITION of pest control products, and the predictable REVOCATION of the Golf Industry Exception Status.

toxicity issues, the CGSA has WEAKENED its credibility as a public affairs spokesman for the Golf In-

issues, CGSA leaders seemingly prefer to WAG-THE-DOG.

DESCRIPTION OF CGSA ACTIONS TO WAG-THE-DOG

LOOMING SHIPWRECK which is on a COLLISION COURSE with Golf Industry PROHIBITION of its pest control products.

CGSA leaders prefer to WAG-THE-DOG.

Furthermore, the leaders of CGSA have decided to ENDORSE the PROHIBITION of pest control products, and SUPPORT the policies of Environmental-Terror-Organizations ... as long as the Golf Industry is provided with an Exception Status.

The 1500 professional members of CGSA NEVER ratified this DISGUSTING and UNACCEPTABLE DECI-SION.

This will ultimately lead to their DOOM!

Moreover, CGSA leaders continue to deceive its DOOMED members with statements like —

- « The Province of British Columbia is currently conducting a consultation exercise to determine if it
- « There is no indication that golf will be included in the prohibition. [...] Golf's use of Health Canada approved pesticide products is not cosmetic. »

CRISIS-?-WHAT-CRISIS-?

VOKING the Golf Industry Exception Status.

The leaders of Canadian Golf Superintendents Association (CGSA) do NOT understand that they are

THE-DOG.

The Enviro-Terrorist THREAT against the Golf Industry is LOOMING!

CGSA WAG-THE-DOG WITH QUINTOZENE

ciation performing what is called WAG-THE-DOG.

WAG-THE-DOG is best known as a 1997 film starring Robert De Niro and Dustin Hoffman.

This film was based on the novel AMERICAN HERO.

It is the story of a group of people who attempt to DISTRACT the U.S. electorate from a presidential

This event was CONCOCTED in order to take political pressure away from the sex scandal.

- Premiers of Quebec CONCOCTED Referendums for Separation, which were used to DISTRACT the electorate from problems with the economy
- President Bill Clinton CONCOCTED the NATO bombing of Kosovo, which was used to DISTRACT the electorate from his sex scandal with Monica Lewinski
- President George H. W. Bush CONCOCTED Operation Desert Storm
- President Jimmy Carter CONCOCTED Operation Eagle Claw, which was used to DISTRACT the electorate from his weaknesses as President
- DISTRACT its membership from the LOOMING SHIPWRECK which is on a COLLISION COURSE with

Rather than deal with the LOOMING GOLF INDUSTRY SHIPWRECK, CGSA leaders clearly prefer to WAG-THE-DOG.

To implement a doomed operation to SAVE-QUINTOZENE is a means of diverting negative attention away from the more serious and complex issues surrounding the PROHIBITION of pest control products that are FEDERALLY LEGAL, SCIENTIFICALLY SAFE, and TOTALLY IRREPLACEABLE.

LEADERS RESPONSIBLE FOR WAG-THE-DOG

Observers do not necessarily hold the elected CGSA leadership responsible for the DISGUSTING and UNACCEPTABLE DECISIONS of CGSA.

Some observers blame the Administrative Staff of CGSA.

elected officials.

Unfortunately, observers have concluded that CGSA Administrative Staff is perhaps NOT SUITED for the task of Public Affairs.

Nor does CGSA Administrative Staff seem to understand the issues regarding DIOXIN, which is a contaminant in quintozene.

In fact, observers strongly recommend that CGSA Administrative Staff be removed from the functions of Public Affairs. They are NOT COMPETENT to represent the Golf Industry.

Distractions like CRISIS-?-WHAT-CRISIS-? and WAG-THE-DOG must end!

CGSA is NOT COMPETENT to represent the Golf Industry in matters of Public Policy



Force Of Nature presents THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE from National Organization Responding Against HUJE that seek to harm the Green Space Industry (NORAHG). It is a series of Reports destined for the Green Space Industry, the Environmental Terror Movement, Governments, and the Media, nationwide across Canada, the United States, and overseas. 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. The neutrality of these Reports might be disputed. Don't thank us. It's a public service. And we are glad to do it.

HUJE 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 use of the terms Maniac, Culprit, Terrorist, or Basterd are not accusations of any legal wrong doing. Force Of Nature is simply holding Enviro Maniac Activists accountable for conspiring to change public policies that TER-RORIZE, HARM, and THREATEN the Green Space Industry.

HUJE is a term used to describe Enviro Maniac Activists that routinely concoct FEAR MONGERING, FRAUDULENT LIES, MISCONCEPTIONS, COERCION, THREATS, 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 CONSPIRACY to PROHIBIT conventional pest control products that are FEDERALLY LEGAL SCIENTIFICALLY SAFE, TOTALLY IRREPLACEABLE, and ARSOLUTELY INDISPENSABLE.

HUJE have created LOSS OF REVENUES, BUSINESS FAILURES, BANKRUPTCY, and UNEMPLOYMENT, inflicting DESPAIR and DESTITUTION for THOUSANDS of hapless victims throughout the Green Space Industry. The DEPRAVED INDIFFERENCE of Maniac Culprit Terrorist Basterd HUJE is viewed as a form of TERROR, HARM, and THREAT against the Green Space Industry.

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Force Of Nature, and its various incarnations, is the brainchild of William H. Gathercole and his colleagues. Mr. 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 UNI-VERSITY 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, PROFESSIONAL LAWN CARE, and CHEMICAL INDUSTRY, and has served in environmental compliance, government negotiations, public affairs, and workplace safety. Mr. Gathercole has supervised, consulted, programmed, and/or overseen the successful and safe 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 and his colleagues have followed the evolution of ENVIRONMENTAL TERRORISM for over a quarter century. For FIFTEEN YEARS, the strategies designed and implemented by Mr. Gathercole and his colleagues guaranteed the control of the VERMIN OF ENVIRONMENTAL TERROR for the entire Modern Green Space Industry across Canada. Their involvement in Environmental Issues reached a fevered pitch in the 1990s, when he orchestrated, with his colleagues, legal action against the Forces of Environmental Evil in the Town of Hudson, Quebec.

Today, Mr. Gathercole is the ONLY TRUE RELIABLE WITNESS of the Hudson Affair. Mr. Gathercole is personally credited for crafting the Golf Industry Exception Status that endures to this day. He is also the creator of the signs that are now used for posting after application. His vast knowledge of our long journey with Environmental Issues is UNDENIABLE — hopefully! Mr. Gathercole is now retired, although his name continues to appear as FOUNDER of Force Of Nature.

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