



February 15, 2008

Ministry of the Environment
Integrated Environmental Planning Division
Strategic Policy Branch
135 St. Clair Ave. West
Floor 11
Toronto, ON
M4V 1P5

Attention: Robert Bilyea, Senior Policy Advisor

Re: EBR Registry Number: 010-2248 Notice of intent to introduce legislation that would ban the cosmetic use of pesticides in Ontario

Dear Mr. Bilyea:

The Canadian Golf Superintendents Association represents over 1,500 individuals involved in the management of golf facilities across Canada. Its mission states that it is a society committed to excellence in golf course management and environmental responsibility through the continuing professional development of its members.

In Ontario, the golf industry has worked for more than a decade to educate golf course superintendents on the judicious use of pesticides in the management of turfgrass. In fact, Canada was the first country to introduce Environmental Guidelines for Golf Courses and has been referenced in the *Environmental Principles for Golf Courses in the United States* and *An Environmental Strategy for Golf in Europe*. The Canadian guidelines were developed in 1993 by the Royal Canadian Golf Association in consultation with the Canadian Golf Superintendents Association (CGSA) and revised in 2007.

In 2001, the CGSA developed the Environmental Management Resource Manual for golf. This guideline was distributed to all of its members and was recognized by both the Golf Course Superintendents Association of America and the British International Golf Greenkeepers Association as a key resource in the area of golf course management. In addition, since 1997 all superintendent and assistant superintendent members of the CGSA have been required to be licensed through their respective provincial government authority in the proper use of approved pest control products.

The motivation for these and many other initiatives is both economic and environmental. Besides the fact that pesticides require a significant expenditure, the current patchwork of municipal by-laws restricting the use of pesticides creates a situation that has the potential to be confusing for the superintendents and the golf industry. It could also

205-5520 Explorer Drive, Mississauga, Ontario, Canada L4W 5L1
Tel: 905-602-8873 . Toll Free 800-387-1056 . Fax 905-602-1958
Email: cgsa@golfsupers.com Website: www.golfsupers.com

serve to drive golfers out of one community to an adjacent municipality to find the playing conditions they seek. As such, the Ontario golf industry welcomes the Provincial Government's proposal to introduce pesticide legislation that will level the business playing field from the uneven situation currently being created by the enactment of municipal by-laws. From the perspective of the environment, stewardship has always been at the forefront of the profession of golf course management in Canada. As such, the value of the golf course as a "green" enterprise within the community has never been more in the forefront than it is today. This value is further enhanced by the current industry focus on issues such as water quantity and quality, carbon reduction, habitat protection and the need to maintain green space corridors within urban settings.

Given the above factors, the CGSA would recommend the following inclusions in the Province's legislative package:

- That the legislation include a provision requiring each golf facility to be IPM accredited and to have a qualified IPM Agent ;
- Provide a minimum period of three years but preferably five years for all golf facilities in Ontario to become certified;
- A provision in the legislation that restricts municipalities from passing legislation related to pesticide use, and;
- That the legislation be supported by the provision of funding assistance for small budget facilities to enable them to comply with the legislation.

In addition, the CGSA would offer its expertise through its professional members to assist the government with the drafting of the legislation and with the ongoing implementation of the IPM accreditation program. Again we would emphasize that the CGSA is committed to the protection of Ontario communities. We feel that the best way to minimize inputs of all types is through the use of IPM.

The following points form the framework for our submission and the legislative proposals included above:

- turf on the golf course is **NOT** cosmetic or non-essential. The greens, tees and fairways are playing surfaces that are necessary to the game and to the business of golf. Since the business of golf depends on the quality of the playing surface, the negative economic impact of unsuitable or unplayable turf conditions would be economically devastating to a golf facility. As such, turf is essential to the business of golf and pesticides are vital to the proper health and care of turf;
- the majority of golf course superintendents have a minimum of a two-year post-secondary diploma in turfgrass management (CGSA Compensation and Benefits Survey, 2007). They are trained and licensed to use, store and properly dispose of pesticides. They receive continuing education through a variety of sources (including national and regional conferences, regional seminars, web casts, university courses and online education) on new cultural practices, products and turf species, all focused on using all of the necessary inputs to provide suitable playing surfaces;
- as a result of pesticide applicator licensing and the other ongoing educational opportunities, superintendents practice good product stewardship, follow label

instructions regarding personal protective equipment to minimize risk and re-cycle containers where programs exist to do so;

- ***the pest control products used are expense items and are used only when needed.*** Golf is a business, like most other recreational pursuits, and the economics of the business require superintendents to operate within the limits of annual budget estimates. It is not in the superintendent's best interest to exceed these budget estimates. However, when IPM protocols indicate that they are needed, there really are no other viable options. There are fungal organisms that can destroy large areas of turf overnight that must be pre-treated when the climate conditions for disease development are observed. One such organism is pythium blight. In the case of snow mould, this pathogen must be treated in the fall before it snows. If it is not treated, it can have a negative impact on the club in the spring. There are also insect and weed species that require the use of approved pesticides to ensure that significant damage to the turf will not occur which, in turn, would be expensive to repair and would result in reduced income for the golf property. Any of these scenarios could be cause for termination of employment for the superintendent;
- the golf industry is committed to finding plant species and management practices that are complimentary to the objectives of integrated pest management (IPM). The golf industry funds research at Canadian universities through the Canadian Turfgrass Research Foundation (CTRF) and several other turfgrass research organizations at the provincial level, including the Ontario Turf Research Foundation (OTRF). Research being conducted at the University of Guelph at the Guelph Turfgrass Institute and at McGill University in Montreal is focused on the development of new products for the control of turf pests. These products, when commercially available, may provide additional mechanisms that can be used to improve the superintendents' efforts at the control and prevention of harmful pests;
- most golf courses have controlled access. All golf courses are required to post signs 24 hours in advance of using pest control products. These signs are placed at the entrance to the golf course, in the pro shop and at the first and tenth tees. Also, in most cases, entry to the property is through controlled access points where a fee is required to be paid, further limiting the possibility of uninformed access to the property;
- the turf used on golf courses is made up of very different species than turf found on a residential lawn or parkland. For example, creeping bentgrass was developed specifically for low mowing heights to create a quality playing surface;
- the golf industry around the globe has embarked on an effort to reduce the expectations of the golfer so as to reduce the need for intense maintenance practices;
- if municipalities develop unique requirements with respect to product use and availability it will potentially create different playing conditions from one municipality to the other. This, in turn, could result in golfers choosing to change where they play resulting in economic hardship for golf courses in the regulated community;
- while research to find biological alternatives takes time and money, we do know from research conducted at Bethpage State Golf Course on Long Island by Cornell University, that Integrated Pest Management (IPM) does help to curb pesticide use. Unfortunately, a

zero pesticide regime with cultural amendments resulted in dead turf, reduced play and significant economic loss;

- the golf course industry pro-actively developed an IPM Accreditation program offered by the IPM/PHC Council of Ontario. It provides a way to ensure that a golf course is practicing IPM. This process requires tracking of all pesticide use and includes an annual third party audit. Administered by Ridgeway College, which is affiliated with the University of Guelph and the Ontario Ministry of Agriculture and Food, this program ensures adherence to IPM through an examination and auditing process;
- a by-law that does not exempt golf courses but allows pesticides to be used during an “infestation”, such as the wording in the City of Toronto by-law, can result in more pesticides being used than legislation requiring an IPM accreditation program. Permitting pesticides to be used during an infestation would require a turf manager to wait for the pest level to reach an infestation which would usually result in a negative impact on playing conditions. This timing would usually require a higher total load of pesticides in response rather than the more judicious spot-spraying and/or pre-treatment approach that would generally be utilized within an IPM program;
- by requiring golf courses to become IPM Accredited, the province will be able to monitor pesticide usage through the IPM/PHC Council of Ontario and each property will be audited by independent environmental auditors at no cost to the province;
- the associated cost of maintaining accreditation in the IPM program may be onerous to smaller golf courses and driving ranges. Financial assistance from the province with these costs would help to ensure compliance;

It should be noted that the current IPM accreditation program can take up to three years for full accreditation since the on-site audit may not occur until the third year after registration in the program. This delay in full accreditation should be noted within the compliance procedures. As long as a golf course can prove that it is moving through the process to become accredited, the CGSA would recommend that it be considered to be in compliance with the requirements of the legislation.

Thank you for your consideration of our submission. Should you have any questions or if you would like to further discuss anything in this submission, please contact Ken Cousineau, Executive Director, CGSA (905) 602-8873 ext. 222.

Yours sincerely,

Terry McNeilly, Master Superintendent (MS)
President
Canadian Golf Superintendent Association