



May 16, 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 010-3348: re Bill 64 - Legislative Amendments to the Pesticides Act to ban the use and sale of pesticides for cosmetic purposes

Dear Mr. Bilyea:

The Canadian Golf Superintendents Association (CGSA) 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.

On behalf of the CGSA, I am pleased to offer our support for Bill 64. Although our organization believes that the approval process imposed by Health Canada through the Pest Management Regulatory Agency (PMRA) on pesticides used in the golf industry in Ontario is rigorous and virtually guarantees that they are safe to use, we do appreciate the role and responsibilities of the government with respect to its need to respond to the concerns and requests of the electorate. At the same time, pest control products when used as part of an IPM program at a golf facility are in no sense cosmetic or non-essential. They are, in fact, essential to maintaining the most important asset that the golf business has, that being, the golf course itself.

As noted in our submission on the previous **EBR Registry Number: 010-2248 Notice of intent to introduce legislation that would ban the cosmetic use of pesticides 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. This work has resulted in the development of many tools aimed at assisting the superintendents in Ontario and across Canada in the environmentally sound management of golf courses. Much of the discussion in our previous submission remains relevant to the discussion on Bill 64 but rather than repeat those points here, I would ask that you make reference to that previous submission in considering our recommendations. I have included a copy of that letter for your reference.

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Bill 64 provides for an exemption for “uses related to golf courses, if any prescribed conditions have been met”. Presumably this would enable golf courses to continue to use products that have been approved by Health Canada provided they were used in accordance with the label specifications.

In our previous submission, the CGSA outlined its recommendations concerning those “prescribed conditions”. They included the following:

- That the prescribed condition for continued use of pesticides by golf courses be that the facility be IPM certified and have a qualified IPM Agent (on staff) ;

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. 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;

- That a minimum period of three years be provided in regulations for all golf facilities in Ontario to become IPM certified. This time frame, if extended to five years, would reduce the potential that a golf course may be prevented from receiving accreditation through no fault of its own but potentially due to a lack of available auditors to conduct all of the required audits within the three year period.

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 show proof 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, provided the program is completed within the five year period.

Bill 64 also restricts municipalities from passing by-laws related to pesticides, unless those bylaws are required to be passed under another Act. The CGSA supports this provision on the basis that:

- if municipalities are permitted to develop unique requirements with respect to product use and availability, it has the potential to create different requirements and 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.

In addition:

- 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 or regulation that would require golf courses to

have IPM accredited staff. 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.

Since the golf course business in Ontario has a wide range of business models operating within the marketplace it should be anticipated that the associated cost of maintaining accreditation in the IPM program may be onerous for some of these enterprises (smaller golf courses and driving ranges). As such, the CGSA is encouraging the Provincial Government to provide financial assistance with these costs to help to ensure compliance.

CGSA is also very conscious of the need for ongoing research to develop new cultural practices and products that will reduce the need to use inputs of all types and, where products are required, ensure that they are environmentally sound. As such, the CGSA would ask that the Ontario Government consider investing funds in turfgrass and golf course management research in partnership with the Ontario Turfgrass Research Foundation and the Guelph Turfgrass Institute.

In addition, the CGSA would offer its expertise through its professional members to assist the government with the drafting of the regulatory provisions 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.

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

Yours sincerely,

Robert Burrows, Master Superintendent (MS)
President
Canadian Golf Superintendent Association