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**Re: EBR posting # 010 – 5080 - New General Regulation under the Pesticides Act, 1990 to implement the Cosmetic Pesticides Ban Act, 2008.**

The Ontario Allied Golf Associations (OAGA) has been working cooperatively with the MOE to find reasonable conditions for the regulation of pesticide use on golf courses under Bill 64. The Ontario government has recognized the special nature of golf course turf through the exception provided in Bill 64. The regulation presented in EBR posting #010-5080 intends to regulate the conditions under which golf courses will be permitted to use pesticides in the future.

Since Integrated Pest Management (IPM) has been scientifically proven to reduce pesticide use on golf courses, the Ontario golf industry supports the requirement for all Ontario golf courses to become IPM Accredited, recognizing that full accreditation may take up to three years to complete.

We further understand the government's desire for transparency and, as such, we concur with providing the public with specific information about the type and amount of pesticides used and what measures have been taken through IPM to reduce their use. For this reason, the golf industry supports the documentation of this use in the report described in section 20 of the draft regulation. We also support the posting of this report on a public website.

The OAGA believes that the timing of this requirement unfairly targets golf courses that have already voluntarily become IPM accredited, by requiring the submission and posting of this public report within a year of the regulations taking effect. The Association also notes that the regulation requires the posting of a printed copy of the report in a building that is on the golf course property and is accessible to the public. This could be problematic given that some private club properties have restricted access and are not accessible to the public. The OAGA believes that the requirement to provide a written copy of the annual report on request should suffice, since the posting of the report on a public website already ensures access. Indeed, the posting of the report on a public website, the availability of a written copy of the report upon request, as well as the availability of golf course staff for further inquiries, provides a very high level of

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transparency for the public to be able to understand how IPM Accreditation ensures the minimum use of pesticides. The requirement of an annual public meeting will **not** further enhance this transparency.

Holding public meetings is counter to the original intent of Bill 64 as expressed by the province. Bill 64 was introduced with the explanation that it would replace the patchwork of municipal bylaws so that all communities are treated equally. Public meetings have the potential to ensure that this emotional issue is opened up annually, in most Ontario municipalities, pitting neighbour against neighbour every year. Golf courses located in a community where a particularly passionate anti-golf activist may reside will be treated quite differently than other communities. Mandatory advertising of these meetings could provide anti-golf activists from outside the community, intent on protesting all aspects of golf operations, with a public forum every year.

The requirement for an annual, mandatory public meeting at each golf course is tantamount to downloading the regulation of golf course pesticide use from the Ministry to members of the public, who may be uniformed or biased. The argument that public meetings provide an opportunity for golf course management to inform the public assumes those in attendance wish to be informed. Municipal public meetings on the subject of pesticides have proven that this is not always the case.

The Ontario Allied Golf Associations respectfully requests that the provisions of the draft regulation that would require annual public meetings and the posting of the annual report in a building accessible to the public be removed from the regulation. The Ontario golf industry remains supportive of the efforts of the MOE to reduce pesticide use through IPM, as a science-based solution.

If you have any questions or if you would like to discuss this matter further, please contact Ken Cousineau, CGSA (905) 602-8873 ext. 222; Julie Dionne, RCGA (905) 849-9700 ext. 387; Jarrod Barakett, OGSA (519) 650-5310 or Vince Kishimoto, NGCOA (905) 826-6790.

Respectfully submitted (on behalf of the OAGA)

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