

Robert Bilyea
Senior Policy Advisor
Ministry of the Environment
Integrated Environmental Planning Division
Strategic Policy Branch
135 St. Clair Avenue West
Floor 11
Toronto Ontario
M4V 1P5

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

Dear Mr. Bilyea,

I am the <owner/operator/manager/superintendent> of <golf course name> in <municipality>.

By way of this letter, I express my strong objection to the section of the draft regulation that that would require our golf course to advertise and host a public meeting every year. This action will accomplish little other than to stir up this emotional debate with local residents. The municipal public debates have shown that there are some people who are not willing to listen to science or reason and will not be satisfied until pesticides are banned everywhere.

I support the goal to reduce the use of pesticides and our facility is willing to become IPM accredited. It would also be willing to submit a report of our pesticide use with an explanation of what products were used and why. Pesticides are strictly expense items for us and we would not be using them if they were not necessary to provide the playing conditions required to stay in business.

I am concerned about posting pesticide use numbers on a public website, but if there is adequate explanation for why some years may show little decrease or even an increase in use, I would be willing to comply with this requirement.

If our club is forced to host these public meetings every year, I must question the need to become IPM accredited since the management of our golf course is ultimately to be judged not by qualified regulators such as the MOE, but rather by our neighbours. The resulting situation will likely be worse than the municipal meetings that were at least facilitated by professionals and followed the procedures of the municipal government.

I value our property and consider myself a steward of the land. I am willing to work with the government to reduce the amount of pesticides in our environment and to educate the public on their use, but the requirement to host annual public meetings is not only unfeasible, it will incite confrontation with neighbours and activists that make a living speaking at pesticide meetings.

I request that the MOE remove this requirement from the regulations.

Yours truly,