



FORCE OF NATURE

THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE from
National Organization Responding Against HUJE that seek to harm the Green Space Industry (NORAHG)

Hero

Jacquie Doherty

**Pest Control Products are SAFE
and NECESSARY Tools that
PROTECT OUR LANDSCAPES
from the Damage Caused by Pests**

November 8th, 2011

Jacquie Doherty

Presentation to Special Committee on
Cosmetic Pesticides, British Columbia

Selected and adapted excerpts

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Hero Jacquie Doherty

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Integrated Environmental Plant Management Trade Association

My name is JACQUIE DOHERTY.

I am the President of the INTEGRATED ENVIRONMENTAL PLANT MANAGEMENT ASSOCIATION OF WESTERN CANADA, and with me today is Paul Visentin.

He is a director of our association.

I'll just give you a little background.

My husband and I own and have owned for the last 23 years a Professional Lawn Care company in Kamloops, British Columbia.

Paul Visentin and his wife have a Professional Lawn Care company in Cranbrook, British Columbia.

Our association was established in 1983 as the Environmental Standards Association.

Over the years, it has evolved into the Integrated Environmental Plant Management Association of Western Canada.

Our main focus is our annual educational conference held at the end of January in Kelowna.

We represent PROFESSIONAL CERTIFIED PEST CONTROL PRODUCT APPLICATORS in British Columbia, Alberta, Saskatchewan and Manitoba.

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Purpose of Presentation

Although Integrated Environmental Plant Management Association have members throughout Western Canada, we are here today to represent our British Columbia members and their clients, as they will be the ones affected by the recommendations of this committee.

Why we are here today —

... to provide input to the Special Committee on Cosmetic Pesticides regarding pest control products and the impact a ban would have on the Professional Lawn Care Industry and also on British Columbia landscapes.

Pesticides Are NOT Cosmetic

Pest control products are NOT cosmetic.

They are applied to help PROTECT OUR LANDSCAPES from the damage caused by insects, weeds, and disease.

Insecticides, herbicides, and fungicides are used very selectively, and only when necessary to PROTECT THE HEALTH of our lawns, trees and ornamentals in our Urban Landscapes.

Anti-Pesticide

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Speaking Out Against

First and foremost, pest control products are NOT USED PRIMARILY FOR AESTHETIC REASONS.

They are tools that help to ENSURE A HEALTHY LANDSCAPE.

The use of pest control products PROTECTS OUR LANDSCAPES as VALUABLE ECOLOGICALLY IMPORTANT AREAS.



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The Benefits of a Well-Maintained Landscape

Residential landscapes are TREMENDOUS ECONOMIC ASSETS as well as vital green spaces that ENHANCE OUR COMMUNITY'S BEAUTY and OVERALL HEALTHY STATE.

Some of the benefits of a well-maintained landscape —

- a healthy green spaces REDUCE NOISE POLLUTION
- a lawn FILTERS SURFACE WATER and returns it back to the water table
- a nicely landscaped yard ADDS VALUE TO THE PROPERTY by as much as 25 per cent
- a thick, healthy lawn PREVENTS SOIL EROSION
- a well-maintained landscape MAKES US FEEL GOOD
- a well-maintained landscape trees and lawns COOL AND CLEAN THE AIR WE BREATHE
- an attractive landscape is PLEASING TO THE EYE

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Speaking Out Against

Vancouver Coastal Health in British Columbia

Vancouver Coastal Health is a Government Agency that is responsible for health care services in in the following regions of British Columbia —

- Along the Sea-To-Sky Highway
- Central Coast
- City of North Vancouver
- City of Richmond
- City of Vancouver
- City of West Vancouver
- Sunshine Coast

According to Dr. James D. Lu, Medical Health Officer of Vancouver Coastal Health —

<< *The aesthetics of urban landscapes has PUBLIC HEALTH VALUE. Appealing and well-kept neighbourhoods INCREASE THE PUBLIC SENSE OF SAFETY and INCREASE OUTDOOR ACTIVITIES in neighbourhoods.* >>

Of course, that's what we are all striving for — safe, healthy communities.

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Provincial Legislation in British Columbia

On December 31st, 2004, the Province of British Columbia passed the INTEGRATED PEST MANAGEMENT ACT.

British Columbia was the first jurisdiction in North America to REQUIRE THE USE OF INTEGRATED PEST MANAGEMENT, or IPM, on all public and private land by commercial pest control product applicators.

Because of British Columbia's forward thinking, we have the most modern and sustainable approach to managing pests in a way that minimizes economic, health and environmental risks.

Integrated Pest Management is a method of combining biological, cultural, physical and chemical tools to maintain landscapes.

Federal Regulatory System in Canada

When it comes to the SAFETY of pest control products, we believe you should RELY on our federal regulatory system.

Health Canada's Pest Management Regulatory Agency (PMRA), and its 350 highly qualified scientists, are THE EXPERTS to be relied upon.

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Speaking Out Against

Federal Regulatory System in Canada (continued)

We TRUST Health Canada and its label instructions for the safety of pest control products.

We believe in a SCIENCE-BASED APPROACH to the registration and use of pest control products.

CONSEQUENCES of Prohibition in Ontario

I know we've heard some comments about what's happening in the Province of Ontario.

I wanted to touch on the Ontario BAN on pest control products, which came into effect on April 22nd, 2009.

This is a photo taken of the Queensway in Toronto on July 28th, 2010.

(See next page.)

No ... those are NOT ornamental plants.

Those are actually WEEDS that are probably four to five feet high, growing along the road-way.

Jacquie Doherty

Presentation to Special Committee on
Cosmetic Pesticides, British Columbia

CONSEQUENCES
of Prohibition in Ontario
(continued)



**Weed-Infested Public Green Space in Toronto
— the Effects of PROHIBITION in Ontario**

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Speaking Out Against

DEVASTATING Effects of Prohibition in Ontario

According to Cheryl Machan of the trade association called Professional Lawn Care Association of Ontario —

**... the ban has had a DEVASTATING EFFECT
on the Professional Lawn Care Industry.**

Since the ban was enacted, HALF the Professional Lawn Care companies HAVE CLOSED THEIR DOORS.

The remaining Professional Lawn Care companies have LOST 30 TO 50 PER CENT OF THEIR CUSTOMERS.

Businesses servicing commercial properties have LOSSES OF 50 TO 75 PER CENT.

They expect the one- and two-truck operations WILL DISAPPEAR WITHIN THE NEXT YEAR.

One company, for example, had six trucks running full-time, six days a week, and is now DOWN to three trucks operating only on a part-time basis.

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More DEVASTATING Effects of Prohibition in Ontario

I also spoke with Steve Chance from the trade association called Landscape Ontario.

He reported that in the 2011 season alone, GROSS REVENUES of companies are DOWN AN AVERAGE OF 30 PER CENT.

PROFIT MARGINS HAVE DROPPED TO 5 TO 10 PERCENT from the original 25 to 30 percent, most due to the cost of the Green Alternative products, and the limited availability of those products.

New Green Alternative products are COSTING APPROXIMATELY 20 TIMES MORE than that of the traditional products used.

Besides their EXORBITANT COSTS, the Green Alternative products are proving to be NOT VERY EFFECTIVE.

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Speaking Out Against

Statements from DEVASTATED Businesses

Landscape Ontario also recently did a SURVEY of its Professional Lawn Care businesses.

These are just some of the statements that they received —

<< We're just barely hanging on. >>

<< In a year or two, we won't exist. >>

<< None of my clients are willing to pay 90 dollars per application for a weed control on a small lawn. >>

<< I have lost all my large properties, because they will not pay 600 to 1,000 dollars for a weed spray. >>

Jacquie Doherty

Presentation to Special Committee on Cosmetic Pesticides, British Columbia

The FAILURES of Green Alternatives

Clients of Professional Lawn Care businesses are UNWILLING TO ACCEPT PRICE INCREASES for Green Alternative products because the results from the previous year were NOT UP TO EXPECTATIONS.

Clients are NOT HAPPY with Professional Lawn Care services because of THE LACK OF PEST CONTROL (i.e., weeds and insects).

These are just some of the statements received from Professional Lawn Care businesses —

<< The cost of the products needs to come down or we can't stay in lawn care anymore. Everyone is teed off about not having the traditional weed control products. >>

<< Many clients are still using the banned products. >>

The following pictures were taken the University of British Columbia's Organic Weed Control Program.

(See next page.)

Anti-Pesticide

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Speaking Out Against

MORE FAILURES
of Green Alternatives



2009 Green Alternative Results

—

**University of British Columbia
Organic Weed Control Program**

Jacquie Doherty

Presentation to Special Committee on
Cosmetic Pesticides, British Columbia

MORE FAILURES
of Green Alternatives
(continued)



2009 Green Alternative Results

—

**University of British Columbia
Organic Weed Control Program**

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Speaking Out Against

Regulatory Consequences

On that note, how are these clients using the BANNED products ?

I found a few news headlines —

<< *Gardeners Cross-Border Shop for Illegal Pesticides.* >>

<< *Ontario Shoppers Escape Pesticide Ban in U.S.* >>

<< *Canadians Go On-Line.* >>

<< *Cross Border to Skirt Pesticides Ban.* >>

Jacquie Doherty

Presentation to Special Committee on
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Regulatory Consequences (continued)

These are some of the REGULATORY CONSEQUENCES that we think need to be a concern —

One — PROHIBITION is going to create a BLACK MARKET for pest control products.

We know that is happening in Ontario.

The public is crossing the border.

Two — PROHIBITION is going to remove the trained, licenced, certified applicators.

So the professionals who know what they're doing will no longer be allowed to apply the products.

Three — PROHIBITION undermines Health Canada's authority.

The bans suggest that Health Canada isn't doing its job, and we believe, in fact, Health Canada IS doing its job.

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Speaking Out Against

Regulatory Consequences (continued)

Four — PROHIBITION encourages SMUGGLING OF UNREGISTERED pest control products.

What I mean by « *unregistered* » is that Canada has a VERY STRICT REGULATORY SYSTEM.

So there are products in the United States that are NOT REGISTERED for use in Canada — these products are being brought across the border as well, and that's a big concern.

Five — PROHIBITION also encourages HOME-MADE CONCOCTIONS.

People are making home-made pest control products in their kitchens, and they're using them out in their yards and gardens, WITHOUT BEING ASSURED THAT THESE PRODUCTS ARE SAFE for their health or for the environment.

Six — PROHIBITION DEREGULATES the use and control of products being applied, which goes hand-in-hand with the government LOSING REAL CONTROL and knowledge of what's actually being used.

So now, the home-owners are MAKING THEIR OWN PRODUCTS.

They're bringing products from across the border, or whatever, but the federal government has NO IDEA what exactly is going on out there.

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Regulatory Consequences for British Columbia

In British Columbia, of course, we have a lot of our population in the lower portion of the province, so they have EASY ACCESS TO CROSSING THE BORDER to the United States and gathering products.

Then, we also have the British Columbia border adjoining the Province of Alberta.

NO PROHIBITION in Alberta

The Province of Alberta has taken the stand that they TRUST Health Canada and WILL NOT PROHIBIT pest control products.

Alberta WILL NOT PLAN ON BANNING pest control products for residential use.

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Speaking Out Against

Weed-and-Feed Products

What Alberta has done is removed the combination « *Weed-and-Feed* » products.

Alberta believed « *Weed-and-Feed* » products did not fit into an Integrated Pest Management plan.

So, the home-owner buys a bag of « *Weed-and-Feed* », covers the whole lawn with it, and, in fact, there may not be weeds over the whole lawn.

It would be a better alternative and remove the unnecessary use.

You can go buy a bag of fertilizer, apply it to the lawn area, and then you can buy a little container of weed control product, and spot-apply to those weeds, so that's a better alternative.

That's an alternative that Integrated Environmental Plant Management Association would support as well.

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Assessments by Health Canada

Integrated Environmental Plant Management Association (IEPMA) of Western Canada supports the use of pest control products under the guidelines of Health Canada's Pest Management Regulatory Agency.

When Health Canada ASSESSES pest control products, it uses the PRECAUTIONARY PRINCIPLE.

I wanted to bring to your attention is that pest control products like 2,4-D has been the subject of over 40,000 studies.

Some activists who oppose pest control products may present themselves as medical doctors, but I don't think medical doctors are toxicologists.

So I'm not really sure if these activists are in their realm of expertise when making their statements.

I guess our position is we trust Health Canada, and we trust toxicologists.

We trust the 350 scientists that have looked at these products.

We believe in experts like Keith Solomon when they say that these products are NOT TOXIC.

On the matter of domestic use, Health Canada takes into account that possibly the home-owner may not use these products appropriately — so that's already factored into risk assessment.

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Speaking Out Against

Survey from Canadian Consumer Specialty Products Association

In 2011, Canadian Consumer Specialty Products Association did a SURVEY of home-owners in British Columbia.

The first paragraph of this survey's news release is what I wanted to pay attention to —

<< A new survey shows the MAJORITY of British Columbians FAVOUR THE CONTINUED USE OF PESTICIDES around their homes and in public green spaces, as opposed to having a province-wide ban on these products. >>

British Columbians are certainly NOT IN FAVOUR OF A PROVINCE-WIDE BAN.

They realize that they need and they want to continue to use these necessary and safe products.

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Presentation to Special Committee on Cosmetic Pesticides, British Columbia

Summary of Position

To summarize ...

Integrated Environmental Plant Management Association (IEPMA) of Western Canada supports the use of pest control products under the guidelines of ...

- Health Canada's Pest Management Regulatory Agency, and
- British Columbia's Integrated Pest Management Act and Regulations.

Integrated Environmental Plant Management Association of Western Canada
DOES NOT SUPPORT FURTHER RESTRICTIONS.

Integrated Environmental Plant Management Association of Western Canada
believes pest control products ARE NOT COSMETIC.

IEPMA believes that pest control products are necessary tools for homeowners and companies throughout British Columbia.

IEPMA believes in a SCIENCE-BASED APPROACH when dealing with pest control products.

IPMA and the MAJORITY of British Columbians supports continued use of pest control products.

**STOP lying around
doing NOTHING against
Lunatic Terrorist
PROHIBITION**



What YOU can do in the war against Lunatic Anti-Pesticide Terrorism ?!?!?!

What can YOU do against Anti-Pesticide Lunatics ?

WRITE AGAINST THE LUNATICS !

**FIGHT AGAINST the
CONSPIRACY to PROHIBIT
pest control products
in the Urban Landscape**

**RAT-OUT the Anti-Pesticide Lunatics
with COMPLAINTS through
LETTERS TO THE EDITOR
and with SUBMISSIONS
to the government**

**Anti-Pesticide Lunatics are GOVERNMENT-
FINANCED with TAX-FREE MONEY**

**Demand a REVOCATION of their organizations'
REGISTERED CHARITY TAX-EXEMPT STATUS !**



FORCE OF NATURE

NORAHG

In the 9|11 Era of Environmental Terrorism, at least ONE SUBVERSIVE ACT OF TERROR is Perpetrated EVERY SINGLE DAY by enviro lunatics.

We are living in the DARK AGE OF ANTI PESTICIDE TERRORISM where sound science is trumped by JUNK SCIENCE and UNVERIFIABLE SECRET EVIDENCE through FABRICATION, INNUENDO, and INTERNET RUMOUR — scientific research PROVES that pest control products CAUSE NO HARM and can be USED SAFELY.

NORAHG is National Organization Responding Against HUJE that seek to harm the Green Space Industry.

NORAHG represents the VAST SILENT MAJORITY of people in the Green Space Industry who are OPPOSED to PROHIBITION.

NORAHG is a NATIONAL NON PROFIT NON PARTISAN organization dedicated to reporting the work of RESPECTED and HIGHLY RATED EXPERTS who promote ENVIRONMENTAL REALISM and PESTICIDE TRUTHS.

Anti Pesticide HUJE are enviro lunatics and lawn haters who particularly DESPISE the golf industry — they are Hateful Underhanded Jokes as Environmentalists who have been WRONG FOR OVER 50 YEARS.

There is NO RECOURSE but LITIGATION against these HUJE, as well as CANCELLATION of GOVERNMENT GRANTS and REVOCATION of the TAX-EXEMPT STATUS of their organizations. HUJE should Get OFF Our grASS, and they should Roast In Hell.

Anti Pesticide HUJE are advised that all names, statements, activities, and affiliations have been ARCHIVED for eventual CRIMINAL CHARGES.

NORAHG manages the Library Computer Access and Retrieval System for all anti pesticide terrorist acts of subversion.

The NORAHG Library Computer Access and Retrieval System is a VAST ARCHIVE of DOCUMENTS, AUDIO CLIPS, and VIDEOS on ALL anti pesticide activities — it has been made AVAILABLE to anyone interested in litigation.

These ARCHIVES contain names, statements, activities, and affiliations of ALL anti pesticide vermin, including government officials, as well as charitable prohibition terrorist organizations that DO NOT DESERVE ANY tax exempt status.

Interested parties need only to send NORAHG their REQUESTS for ANY INFORMATION needed in the War Against Lunatic Terrorist PROHIBITION.

NORAHG also produces FORCE OF NATURE, reports that present THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE about environmental issues, including anti pesticide terrorism.

FORCE OF NATURE is a series of reports destined for the green space industry, the environmental terrorist movement, governments, and the media, nationwide across Canada, the United States, and overseas.

FORCE OF NATURE is committed to SOUND SCIENCE, as well as ground breaking original reporting that informs, entertains, and creates real change.

The Force Of Nature Series of Reports — Agriculture • ALBERTA Conspiracy • Bee Colony Collapse Disorder • Bee Colony Collapse Disorder • Benefits of the Turfgrass Industry • Beyond Pesticides • Books That Screwed Up the World • BRITISH COLUMBIA Conspiracy • Canadian Cancer Society • Canadian Association of Physicians for the Environment • CARNAGE and Consequences of Lunatic Terrorist Prohibition • Controversial Prohibitions • Culprits of the Prohibition Conspiracy • Daffodils, Toxic Pesticide Treated Flowers Soaked Formaldehyde • Dating Services for Enviro Maniacs • David Suzuki Foundation • DDT and Our World of Politicized Science • Death and Illness (Alleged) • Departure Letters • Ecojustice Canada • Energy Sector • Environmental Terrorists UNMASKED • Environmental Terrorist Organizations • Enviro PROFIT • Environmental Defence • FAILURE of IPM, Pesticide Manufacturers, Prohibition, Trade Associations • Famous Quotations About Enviro Lunatics • Fertilizer TERROR • Food and Farming • Get Off Our grASS • Global Warming, The Scam of Our Lifetime • Golf Industry • Green Alternatives • Green Party • Halloween Terror • Happy Holidays • Health Canada • Health Concerns with Pest Control Products • Heroes Speaking Out Against Environmental Terror • History of Environmental Terror in Canada • History of the Turfgrass Industry • Letters to the Editor • LIARS and Lying Sacks of (Enviro Maniac) Cwap • Mock Advertisements • Mock Speeches • Myth BUSTING • NATIONAL Prohibition • NEW BRUNSWICK Conspiracy • NO Prohibition Exception for AGRICULTURE Industry • NO Prohibition Exception for GOLF Industry • NOVA SCOTIA Conspiracy • North America Free Trade Agreement (NAFTA) • ONTARIO Conspiracy, Haven For Environmental Terrorists • Ontario College of Family Physicians • Organic Golf Courses • Organic Maintenance • Organizations of the Prohibition Conspiracy • Pesticide Q & A (Questions and Answers) • Positive Waves (Interesting and Innovative Thinking) • PRINCE EDWARD ISLAND (PEI) Conspiracy • QUEBEC Prohibition • Quotations About Enviro Lunatics & Maniacs • Rachel Carson, The Queen of Junk Science • SASKATCHEWAN Conspiracy • Satire, Laughs & Insanity • Terror That NEVER Ends • TERROR Talk and Weasel Words • THE

The Whole Truth from an Independent Perspective

