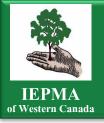


Presentation to the Special Committee on Cosmetic Pesticide Use

November 8, 2011
Jacquie Doherty, President
Paul Visentin, Director



Who We Are

- Our Association was established in 1983 as the Environmental Standards Association, and over the years has evolved into the Integrated Environmental Plant Management Association of Western Canada. Our main focus is an annual educational conference held at the end January, in Kelowna.
- We represent professional certified pesticide applicators in BC, Alberta, Saskatchewan and Manitoba.
- Although we have members throughout Western Canada, we are here today to represent our BC members and their clients as they will be the ones affected by the recommendations of this committee.



Why We Are Here

 We are here today to provide our input to the committee regarding "Cosmetic Pesticides" and the impact a ban would have on our industry and BC landscapes.





Are Pesticides Cosmetic and Unnecessary?

- Pesticides 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.
- First and foremost, pesticides are not used primarily for aesthetic reasons: They are tools that help to ensure a healthy landscape. The use of these products protects our landscapes as valuable, ecologically-important areas. Residential landscapes are tremendous economic assets as well as vital green spaces that enhance our communities' beauty and overall healthy state.



The Benefits of Healthy Maintained Urban Landscapes

- A thick healthy lawn prevents soil erosion
- Trees and lawns cool and clean the air we breath
- A Lawn filters surface water and returns it to the water table
- Healthy green spaces reduces noise pollution
- A nicely landscaped yard adds value to our property (as much as 25%)
- Attractive landscapes are pleasing to the eye and make us feel good



Dr. James D. Lu, Medical Health Officer for Vancouver Coastal Health, has stated:

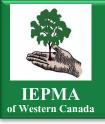
"The aesthetics of urban landscapes has public health value. Appealing and well-kept neighborhoods increase the public's sense of safety and increase outdoor activities in neighborhoods".

And of course we all want Safe Healthy Communities



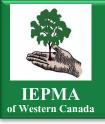
Integrated Pest Management Act

- On December 31, 2004, B.C. passed the Integrated Pest Management Act. BC was the first jurisdiction in North America to require the use of Integrated Pest Management (IPM) on all public and private land by all commercial pesticide applicators.
- Because of BC's forward thinking we have the most modern and sustainable approach to managing pests in a way that minimizes economic, health, and environmental risks.
- IPM it is a method of combining biological, cultural, physical and chemical tools to maintain landscapes.



Pesticide Safety

- When it comes to pesticide safety, we believe you should rely on our federal regulatory system.
- Health Canada's PMRA and it's 350 highly- qualified scientists are the experts to be relied upon.
- We trust Health Canada and its label instructions for the safety of pesticides.
- We believe in a science-based approach to the registration and use of pesticides.



Ontario's cosmetic pesticide ban came into effect on April 22, 2009.



The Queensway, Toronto, Ontario



According to Cheryl Machan of the Professional Lawn Care Association of Ontario (PLACO):

- The ban has had a devastating effect on the lawn care industry
- Since the ban was enacted, half of the Lawn Care Companies have closed their doors.
- Companies that are left have lost 30 50 % of their customers.
- Business servicing commercial properties have losses of 50 to 75 %.
- The 1 and 2 truck operations are expected to disappear within the next year.
- One company, which had 6 trucks running full time, 6 days a week, is down to 3 trucks operating part-time.



According to Steve Tschantz, Landscape Ontario:

- This season alone gross revenues of companies are down an average of 30%.
- Profit margins have dropped to 5-10% from 25-30%, mostly due to the costs of the alternative products and their limited availability.
- New products cost approximately 20 times that of traditional products
- Besides their exorbitant cost, the alternative products are not very effective.



Landscape Ontario Recently did a Survey of Lawn Care Operators The following are some of the comments received:

- We're just barely hanging on. In a year or two we won't exist.
- None of my clients are willing to pay \$90.00 per app. for a weed control, and that's
 on a small lawn. I have lost all my large properties because they won't pay \$600 to
 \$1000 for a weed spray.
- (Clients) unwilling to accept price increases for organic products because they feel from the results last year, the organic options were not up to expectations
- (Clients) not happy with services, because of the lack of pest control i.e. weeds insects.
- The cost of 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 banned products.



Regulatory Consequences of a Cosmetic Pesticide Ban

Recent News Headlines

"GARDENERS CROSS-BORDER SHOP FOR ILLEGAL PESTICIDES"

CBC News May 19, 2011

"ONTARIO SHOPPERS ESCAPE PESTICIDE BAN IN U.S."

Toronto Sun August 21, 2011

"CANADIANS GO ONLINE, CROSS BORDER TO SKIRT PESTICIDE BAN"

ca.news.yahoo May 20, 2011



Regulatory Consequences of a Cosmetic Pesticide Ban

These are some of our concerns with prohibiting necessary products:

- Creates a black market for the products
- Removes trained and licenced certified applicators
- Undermines Health Canada's Authority (bans suggest Health Canada isn't doing their job)
- Encourages Smuggling of un-registered products
- Encourages Homemade concoctions
- Encourages Homeowners to stockpile products prior to ban
- De-regulates the use and control of products being applied
- The Government loses real control and knowledge of what is actually being used



Do British Columbians Support a Ban?

August 17, 2011, Ottawa, ON –

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.

http://www.healthycleaning101.org/english/media.html



CCSPA CANADIAN CONSUMER SPECIALTY PRODUCTS ASSOCIATION®

ACPCS L'ASSOCIATION CANADIENNE DE PRODUITS DE CONSOMMATION SPECIALISÉS ®

News Release

British Columbia residents support continued use of pest control products

– a recent poll says

August 17, 2011, Ottawa, ON – 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.

"There is a misperception that most residents want a ban," said Shannon Coombs, President of the Canadian Consumer Specialty Products Association (CCSPA), which commissioned the study. "The results of this poll clearly reflect it is only a minority of the population, especially when residents are asked about specific pest problems and scenarios."

The poll presented respondents with eight potential scenarios. Responses to these scenarios included:

Insect control

- 88% of those surveyed indicated insect control by homeowners inside their residences should be allowed (65%) or allowed under certain circumstances (23%). This number climbed to 92% support when respondents were asked if professional insect control inside homes should be allowed or allowed under certain circumstances.
- 73% of respondents said homeowners should also be allowed or allowed under certain circumstances to use insect control products on their lawns and gardens. This number increased to 84% if the pesticides were to be applied by trained operators.

Weed contro

 64% of respondents indicated homeowners should be allowed to use weed control products on their lawns and gardens. 70% of respondents said trained or licensed operators should be allowed to use these products on privately owned lawns and gardens.

When looking at all eight potential scenarios covered by the poll, 25% of respondents said pest control products should be allowed for all scenarios; and 83% said "yes" to at least one scenario. It is important to note that less than 10% said "no" to six or more of the eight scenarios and only 2% said "no" to every scenario.

The poll also highlights that 69% of British Columbia (B.C.) residents trust Health Canada's regulation of the sale and use of pest control products and 58% of residents are aware of the provincial government's role in ensuring relevant information is provided to consumers at point of purchase. These data indicate the B.C. Government has an excellent opportunity to reach out to consumers even more and provide value-added information.



To Summarize

- The IEPMA supports the use of pesticides under the guidelines of Health Canada's PMRA and BC's Integrated Pest Management Act and Regulations. It does not support further restrictions.
- The IEPMA believes pesticides are not "cosmetic" and are necessary tools for homeowners and companies throughout BC.
- The IEPMA believes in a science-based approach when dealing with pesticides.
- The IEPMA and the majority of British Columbians support continued use of pesticides.



UBC's Organic Weed Control Program



Lawn Damage From Insects, Weeds, and Disease



Lawn effected by Red Thread Fungus



June Beetle or European Chafer larvae



Damage caused by June Beetle or European Chafer larvae



Unhealthy lawns encourage the establishment of broadleaf weeds

A healthy lawn after fertilizing and a spot application of a herbicide