









NATIONAL ALLIED GOLF ASSOCIATION - BRITISH COLUMBIA PESTICIDE LEGISLATION BRIEFING DOCUMENT COVER LETTER

October 17, 2011

Dear BC Golf Industry Personnel,

A special bi-partisan government committee has been struck to review the issue of cosmetic pesticides, including those used on golf courses. This 'Special Committee on Cosmetic Pesticides' is tasked with making public policy recommendations to the government concerning the sale and use of 'cosmetic pesticides' in the province of British Columbia.

NAGA - BC believes a pesticide ban on golf courses would have a dramatic negative impact on the entire golf industry in this province.

A briefing document has been created by NAGA - BC for submission to the BC Government in opposition of any further restrictive legislation pertaining to the use of pesticides on golf courses. This document will also assist individual and regional lobby efforts relating to the potential cosmetic pesticide ban currently being considered by the government.

This is not just an issue for golf course superintendents. All golf industry and related personnel, including players, are encouraged to become pro-active by contacting local MLA's to voice your concerns. NAGA BC also asks that each region of the province puts together a panel to do the same.

This panel may typically include a golf course superintendent, a general manager or owner, a golf professional and a regional tourism board representative. Groups are already being formed in both the Kootenays and Okanagan.

It is critically important that our message is consistent throughout the process and along with the briefing document, NAGA - BC has other support material outlining the economic impact of golf in the province, the social and environmental benefits golf brings and a description of an Integrated Plant Management approach where pesticides are used judiciously and only when absolutely necessary.

Key statement from NAGA - BC:

'Golf is good for our health, our environment, and the economy of British Columbia.'

Some helpful tips:

- Discuss the issue amongst the management/ownership of your golf facility. Ask the question, 'How would a pesticide ban affect our business?'
- Contact your local MLA by phone or email. Ask them to visit and tour your facility or at the very least, request a meeting in their office.
- Feel free to use NAGA BC support material as needed but do not use a form letter. State your beliefs in your own words as to how a pesticide ban will affect your golf course.
- A maximum of three or four key people from your facility should be involved in any MLA
 meeting. The superintendent should be included to help explain why pesticides are used
 and where. Other personnel from your facility should be able to speak about the business
 side of your operation, ie. number of staff employed at your facility, annual gross sales,
 spin-off revenues and the like.
- Thank MLA's for their time, exchange business cards and invite them back to your facility.
- Contact information for all BC MLA's can be found at http://www.leg.bc.ca/mla/3-1-1.htm

While all pesticides are highly regulated by Health Canada, many organic alternatives have been around for some time and more are coming on the market. Their effectiveness is often very limited however, which drives the need for further research into solutions golf courses can use. NAGA - BC has already begun looking at funding strategies and is hopeful that, in spite of the current economy of golf, each industry association will realize the importance of the pesticide issue and make this a high priority.

For further information on this or any other NAGA - BC initiative, please contact Barrie McWha, Executive Director of the BC Golf House Society and NAGA – BC Chair at (604) 222-4653 (GOLF) or bmcwha@bcgolfhouse.com

You may also contact any of the following:

Doug Ferne – National Golf Course Owner's Association, BC Chapter dferne@ngcoa.ca

Kris Jonasson – British Columbia Golf Association kris@bcga.org

Donald Miyazaki – Professional Golfers Association of BC donald@pgabc.org

Davin Marr – British Columbia Golf Superintendents Association davintmarr@hotmail.com

Jerry Rousseau – Western Canada Turfgrass Association exec.director@wctaturf.com











NATIONAL ALLIED GOLF ASSOCIATION - BRITISH COLUMBIA BRIEFING NOTE REGARDING FURTHER RESTRICTIVE PESTICIDE LEGISLATION

ISSUE

The members of the National Allied Golf Association - British Columbia (NAGA - BC) are requesting the support of the BC Government to exempt golf course grounds from any further restrictive legislation pertaining to the use of federally regulated pest control products.

BACKGROUND

Due to the harsh and variable Canadian climate, golf courses in British Columbia are challenged by any number of disease, weed and insect infestations that can negatively affect the quality and playability of the course. At times, the severity of such damage can render a golf course, or portions thereof, completely unplayable.

The members of NAGA - BC will suffer unnecessary economic hardship if provincial regulations supersede Health Canada's stringent pesticide control act [by enacting an outright ban].

- Golf courses **are not motivated** to apply more pesticides, in fact, the opposite is true. Golf courses do not make more money by applying more pesticides; they are only used within an Integrated Pest Management program which is proven to use up to 60% less pesticides.
- Use of pesticides on golf courses is not cosmetic. A four-year study at Cornell University concluded that "nonchemical management [is] not sustainable given the current technology and negative impact on revenue from reduced golfer play."
- The golf industry collectively allocates **significant funds toward research programs** that helps ensure golf courses are being managed in a sustainable and environmentally friendly manner.
- Nine BC golf courses have been certified by the prestigious Audubon International Society and many more are in various stages of the certification process. The Audubon Cooperative Sanctuary Program for Golf Courses is a voluntary 3rd party program of environmental stewardship that promotes an extremely high level of Integrated Pest Management, beyond even BC's own IPM Act.

Understanding that pest control products are already highly regulated at both the federal and provincial levels, it appears that any further regulatory requirement is completely unnecessary. It should be noted that in every jurisdiction where pesticide legislation has become more restrictive, golf courses have been exempted.

The Regulations

The BC Ministry of Environment is responsible for the protection of human health and the environment in British Columbia. The BC *Integrated Pest Management Act (IPMA),* which relates to the sale and application of pesticides, was passed in the Legislature in October, 2003, replacing the *Pesticide Act.* The *Integrated Pest Management Regulation* was brought into force on December 31, 2004.

British Columbia was the first jurisdiction in North America to enact legislation that required an integrated approach to plant health where pesticides were used only as a last resort. The primary goals of the *Integrated Pest Management (IPM)* Act and Regulation are to:

| ☐ Establish regulatory requirements based on degree of risk to human health and the environment; |
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| ☐ Promote environmental stewardship and integrated pest management; and |
| ☐ Set clear and enforceable standards for the protection of human health and the environment. |

The *Act* and Regulation require the use of Integrated Pest Management for pesticide use on public land; on private land used for forestry, transportation, public utilities and pipelines; and for pest control service companies.

The *Act* links to provisions established under the federal *Pest Control Products Act* regarding pesticide classification and labeling and for unregistered pesticide uses for research purposes.

Federally, Health Canada's Pest Management Regulatory Agency (PMRA) is responsible for administering the *Pest Control Products Act* (PCPA) on behalf of the Minister of Health. The PCPA regulates the products used for the control of pests.

The *Pest Control Products Act* (PCPA) received Royal Assent on December 12, 2002, and came into force on June 28, 2006

The PMRA must also consider other Acts, such as the *Pesticide Residue Compensation Act* (PRCA) and the *Food and Drugs Act* (FDA), which have an impact on pest management.

REQUEST TO BC GOVERNMENT

The members of NAGA - BC have great confidence in the systems and legislation currently in place that safeguard the registration, transportation, dispensing, storage, application and disposal of pest control products. We trust that like our own initiatives, these programs are not static and are constantly evolving as needs change and new technology/information arrives.

NAGA - BC believes that further restrictive pesticide use legislation and regulation on a provincial level is unnecessary and asks the BC Government to exempt golf courses from a proposed provincial pesticide ban – the same treatment as all other jurisdictions where pesticide bans have been enacted.

NAGA - BC also asks that any future legislation addresses the problem of the trend toward municipal pesticide by-laws and regional inconstistencies that ensue.

About NAGA - BC

NAGA - BC comprises all sectors of the golf industry including golf course owners (NGCOA), golf professionals (PGA of BC), golf course superintendents (BCGSA), the governing body for amateur sport and players (BCGA) and the body charged with turfgrass research and development (WCTA).

Golf is the number one sport in Canada based on participation and is played by an estimated 812,000 resident golfers in **British Columbia** at over 316 golf course facilities.

The BC golf industry employs 47,000 people generating \$1.08 billion in household income, \$160.7 million in property and other indirect taxes and about \$256.5 million in income taxes.

Golf in **British Columbia** generates \$4.05 billion in total gross production through direct, indirect and induced spending impacts. The total direct economic activity (total direct sales) resulting from the **British Columbia's** Golf Industry is estimated at \$2.01 billion. Of this total, the revenues generated directly by golf courses, and their associated facilities is estimated at \$617.1 million.

For further information, please contact NAGA - BC Chair, Barrie McWha at bmcwha@bcgolfhouse.com.