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Response to ERO # 019-0601 – Amendments to Pesticide Regulation (63/09 General)

The IPM Council of Canada (The Council) is a not-for-profit association that brings together industry associations and groups committed to having integrated pest management (IPM) as the standard in turf, landscape care, structural and public works vegetation management. The Council administers the IPM Certification & Accreditation Programs for Golf, IPM Certification Program for Specialty Turf and IPM Certification Program for Public Works.

The Council recognizes and appreciates the Ministry's goal to eliminate duplication in the area of pesticide regulation and steam-line how pesticide products are managed and used in Ontario.

The Council also appreciates the elimination of the public meeting requirement for golf courses to present their Annual Report – Class 9 Pesticides Use. Even though the public meetings were never part of the Council's IPM Accreditation Program, since the report was created using data from our accreditation program, the Council and our environmental auditors often received complaints about the expense and poor attendance associated with these meetings.

We note that an exception to the cosmetic pesticide ban is proposed for cemeteries. This exception would require IPM Certification of pesticide applicators, similar to the program for public works. As a recognized IPM Certification program, we respectfully request an adequate amount of time to develop a program for cemeteries. Since IPM for cemeteries would be different from golf courses, specialty turf and public works, appropriate study materials need to be identified and exams must be developed.

In addition, existing exams and documents for both the Golf & Specialty Turf and Public Works Certification and Accreditation programs must be updated to ensure they comply with the amended O. Reg. 63/09 once it comes into effect.

While most of the updates to the existing programs should be accomplished in time for the 2020 growing season, we cannot guarantee that a whole new cemetery program and examination process can be in place in time for spring 2020. We also request that the updated materials meet a timely approval process by the Ministry, in order to serve the affected industry sectors efficiently.