



**Landscape  
Nova Scotia**

## **Landscape Nova Scotia Horticultural Trades Association's**

### **Response to the Proposed Non-Essential Pesticide Ban**

Healthy landscapes do more than beautify our communities – they also contribute to our health and well-being.



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# **Landscape Nova Scotia Horticultural Trades Association Submission**

## **February 4, 2010**

### **Re: Limiting our Risk – A Discussion Paper about a proposed provincial ban on non-essential lawn care pesticides**

Landscape Nova Scotia Horticultural Trades Association (LNS) is pleased to make its submission in response to the Discussion Paper. The use and safety of pesticides is an issue of concern for Nova Scotians and LNS welcomes the opportunity to share its views on this important issue.

LNS has a simple goal - to help Nova Scotians keep the landscape around them beautiful, functional, sustainable and safe. LNS represents landscaping and lawn care services, retail, lawn and garden equipment stores, nursery and greenhouse ornamental horticultural production, manufacturing, landscape architecture and design, greenhouse manufacturing, and wholesale trade. The landscape industry employs thousands of Nova Scotians and provides products and services to many more. According to a survey carried out by Deloitte Inc. for the Canadian Ornamental Horticulture Alliance, the nursery and landscape industry in Nova Scotia generated over \$150 million in sales of goods and services in 2007.

LNS recognizes that Nova Scotians want to maintain healthy, beautiful landscapes and its members work hard to assist its customers in achieving this goal. LNS also understands that Nova Scotians want to do this in an environmentally sustainable manner, and in a manner that respects the health and safety of people and animals. LNS shares these goals.

LNS members only use products that are certified as safe for human and animal health by Health Canada. Employees who use these products are fully licensed and trained in the handling, storage and application of these products and follow the label instructions on their proper handling, storage and application.

It is important to note that the landscape industry has heard the concerns of Nova Scotians on the use of pesticides.

First and foremost, the landscape industry has developed the Integrated Pest Management (IPM) process for controlling pests. IPM will be discussed further below.

The industry has also developed new plant varieties and technologies. These include plant varieties that are more resistant to disease and insects and the development of bio-pesticides, which control pests using naturally occurring elements or processes.

The Discussion Paper poses three questions for comment; LNS' answers follow.

#### **1. Do you believe that the application of pesticides for lawn maintenance is non-essential? Why or why not?**

LNS believes that the properly regulated use of pesticides that are deemed safe are an essential tool in maintaining plant health. Lawn and turf maintenance provides many substantial environmental benefits such as erosion prevention and control, cooling, pollution absorption, noise pollution reduction and carbon capture and sequestration. Well maintained public and private spaces (of which lawns and turf play a major part) make for healthier and happier communities. This includes lawns on private property, and public facilities such as parks and sports fields. Pesticides protect lawns and other plants from insect, weed and disease infestation. Some cultural practices will help

reduce the likelihood of such infestations. However, even the best maintained green spaces will sometimes require the use of pesticides to control infestations.

Uncontrolled insect and disease infestations can very quickly destroy a green space. Early and effective intervention using pesticides approved as safe for use is often required to prevent total loss of a landscape. The effect of weed infestations is more gradual but can be just as severe and can also lead to total loss of the landscape. In addition, uncontrolled weed growth leads to significantly higher pollen amounts in the air, which causes respiratory problems and discomfort for people with allergies and asthma. Failure to control pests with early intervention with pesticides approved as safe for use can lead to significant costs, as property owners must replace landscapes that are destroyed or significantly degraded.

Unfortunately, these benefits are not fully recognized or are discounted in discussions on pesticides. This is apparent in the use of terms such as “non-essential”, “cosmetic” or “aesthetic” when referring to the pesticide use to control lawn/turf pests. For the foregoing reasons, LNS believes that the proper use of approved pesticides is an essential tool for the control of lawn/turf pests.

## **2. Do you agree with the provincial ban on non-essential lawn care pesticides proposed by the Government of Nova Scotia? Why or why not?**

The proposed provincial ban will prohibit the use of properly regulated pesticides that are deemed safe on lawns in Nova Scotia. The Discussion Paper proposes that a list of permitted lawn/turf pesticides will be developed as part of the proposed ban.

LNS believes that there are better alternatives to the proposed ban that should be considered by the Government of Nova Scotia. These alternatives recognize the substantial environmental and community benefits provided by healthy lawns. They also recognize the harm and cost to our environment and health caused by uncontrolled infestations of insects, disease and weeds and the need for properly regulated pesticides that are deemed safe to help control those infestations. One such alternative that LNS strongly advocates is the IPM certification requirement recently adopted by the Province of New Brunswick in its new pesticide rules announced in 2009. Starting in 2010, New Brunswick lawn care professionals will be required to be IPM accredited and follow IPM practices in maintaining lawns.

IPM is a systematic decision making process that takes a preventative approach to controlling pests. It requires proper plant health cultural practices as the first step in controlling pests. IPM considers all available information and treatment methods to reduce (but not completely eliminate) pest levels. Targeted applications of pesticides are only used when necessary to control pests based on monitoring of environmental conditions, pest populations and pest damage. IPM minimizes pest damage while at the same time protecting human health and the environment.

Prince Edward Island also recently announced new rules that take a similar approach to New Brunswick's. LNS recommends that Nova Scotia's new rules be consistent with those adopted by New Brunswick and Prince Edward Island through the adoption of IPM certification as a requirement for lawn care professionals.

## **3. Do you have any additional comments about the proposed non-essential pesticide ban?**

LNS has the following additional comments for the Nova Scotia government to consider:

**a. Rules based on peer reviewed science** – If the Nova Scotia government proceeds with some form of new pesticide restrictions, LNS strongly advocates that any rules on which pesticides are restricted or placed on a per-

mitted list be based on scientific principles on health and safety issues, including the principle of peer review. Health Canada's Pest Management Regulatory Agency (PMRA) completes a rigorous scientific review of health, safety and environmental issues before a pesticide is approved for sale and use. Nova Scotia should ensure its rules complement Health Canada's work in this area and are used to full advantage to protect the health of Nova Scotians along with a protection of Nova Scotia's environment. A sound scientific rationale should be provided for any restrictions that may be imposed as a result of this consultation. In addition, the government of Nova Scotia should clearly describe how it intends to measure the benefits, be they health, environmental or other, of any actions they take on this issue.

**b. Permitted Products List** – If Nova Scotia proceeds with a permitted products list, it is essential that it develop, in conjunction with industry and Health Canada, clear and transparent guidelines and a public process to create the list and to add products to the list in the future. Product manufacturers and lawn care operators need certainty and clarity on whether new products under development will be permitted or restricted from use. Further, it is essential that the Province use scientific criteria to determine which products make the permitted list.

**c. Avoid Patchwork Regulation** - Any new rules introduced by the Nova Scotia government should avoid patchwork regulation across the province. LNS strongly supports a consistent set of rules that apply to all Nova Scotians. It opposes giving municipalities the authority to regulate pesticides on top of provincial regulation. Patchwork regulation causes confusion among residents, industry and customers. It increases the costs of doing business for LNS members, which leads to higher costs passed on to consumers and potential job losses. LNS advocates that Nova Scotia ensure any new rules override any municipal bylaws on pesticides to create a consistent set of rules for the Province.

**d. Appropriate lead time for any Regulatory Changes** – If the Nova Scotia government does introduce new restrictions, then it is very important for our industry to have sufficient lead time to adapt to new rules. Our industry is seasonal in nature and the planning for the upcoming season starts in the fall of the preceding year. This planning includes inventory purchasing, capital investments, hiring and pricing decisions, among others. Introduction of new rules in the Fall that come into effect the following spring will not give businesses in our industry time to make the necessary adjustments to prepare for the new rules. The economic impact of insufficient notice will be severe for many in our industry. Therefore, LNS advocates for a notice period of a minimum of eighteen months to allow time for businesses to adapt. Sufficient lead time is also necessary to allow the Nova Scotia government time to educate the public on new rules. Our industry can play an important role in assisting with that educational process and is willing to work with the Nova Scotia government in this regard.

LNS thanks the Nova Scotia Department of Environment for this opportunity to share its views on the Discussion Paper.

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