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As a former long-time London resident with over 30 years involvement in the pesticide and fertilizer industries both in Canada and the US, I found that the information often being presented to you has been at times unbalanced, filled with hyperbole and inaccurate.

In the last 25 years, lawn care has become an extermination business. Proper and preventative horticultural practices have been completely forgotten - practices that would not require the use of the volume of synthetic pesticides now being applied, practices that prevent the problems and subsequent symptoms (weeds, insects, etc.), practices that results in strong, thick turf, and practices that allow lawncare operators to be profitable.

For your perusal and consideration, I have attached a letter reviewing what I have seen transpire and my comments on what is possible and what is "agenda". I apologize if you find my comments abrupt, but I have found that fence-sitting can lead to falling off which can hurt!

I am willing to be contacted if you would like clarification or more information.

Respectfully

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December 20, 2004

RE: London Pesticide By-law Proposals

To: The City of London Mayor and Members of City Council:

I have been following the progress of London's committees in their efforts to reduce the use of lawn pesticides by introducing a bylaw. I do so as a former 20 year resident of Byron, a long-time (over 30 years) pesticide industry employee and now living in Halifax where such a bylaw was introduced a couple of years ago. Let's just say that weeds have not taken over our lawns! I have carried pesticide applicator licenses for BC, ON and QC agriculture, and when I was at Pfizer/UAP (Pfizer sold their pesticide division to UAP Canada, located in Dorchester) we registered Par III, which is still probably the primary herbicide applied by LCOs. Interestingly, Patti Turner, former chair of your bylaw committee was a long-time employee of UAP before she moved to Kitchener-Waterloo. I was an executive member of the Ontario pesticide industry council (CPIC) and a Director of the National CPIC group. I have also worked in the fertilizer and plant biostimulant industry through-out North America.

The lawncare industry as we know it today started in the late 70's. Franchises could program lawn treatments on a calendar, make quick, green lush grass with a high nitrogen (N) fertilizer and solve any subsequent lawn problems with a pesticide application (weed, insect, disease) irrespective of the conditions of the, or in the, lawn. It became an industry of # of lawns/truck/day. A great many franchisees know nothing about growing grass – they are trained to work a system. The lawn care operators (LCO) became an exterminator and horticultural practices were dismissed.

Lawn pesticides treat symptoms. Symptoms may be weeds, insects, disease, dying grass, etc. Pesticides do not cure the cause of the symptom, aka the problem. Reduce or eliminate the problem and you will have healthy, thick turf that does not require pesticides. Spraying pesticides as the only practice is like taking penicillin all the time in case you get sick! We don't - we try to live right to prevent becoming ill.

IPM – yes IPM is used in some cropping practices – mostly fruit and vegetables. No cash cropper is going to wait to see if weeds come up and find they cannot spray because the rows have closed in! Also the 52% reduction figure is interesting in that the ag chem industry now applies highly active chemistry that requires gm/ac as opposed to the old bulky lbs. of product/ac. That makes the #s look great! Just as many acres are sprayed. Where IPM is effective, the growers have field scouts walking their crops putting up bait lures and these scouts then monitor these traps or look at the plant leaves closely to monitor the insect pressure. When a threshold is reached, only then is a spray applied.

LCOs will not be scouting lawns – they need to get paid for every stop! Lawn care IPM is not prevention. Also, usually 1 person within the company gets the IPM accreditation which allows them to put the stickers on all their trucks - but the applicators are not necessarily accredited! IPM creates a book-keeping exercise and you must show a decrease in chemical usage year to year to maintain this accreditation. This means that LCOs who now do not use synthetic pesticides in their operation cannot be IPM accredited! A problem system.

The Ontario IPM committee is made up of Barefoot Grass (a ChemLawn co), Bayer (the pesticide manufacturer of Merit and Sevin, the only chem. left for turf insect controls) and an employee of Simcoe District Coop in Alliston (a supplier of synthetic fertilizer and pesticides) - all chemical companies with NO interest in applying preventative practices to the turf industry which would result in reduced sales.

Having IPM accredited LCOs make your spray decisions is like having the fox in charge of the henhouse.

LCOs will not go out of business. They may have to learn about a few different products, they may have to do better turf maintenance (mowing, aeration, verticutting, over seeding, etc.), use better quality and balanced fertilizers (in spite of the golfey names on lawn fertilizers, a golf superintendent doesn't use these unbalanced fertilizers), they will need to soil test to balance the nutrients (resulting in more available fertilizer to the plants and better results), improve the soil organic matter (which increases soil microbial activity and reduces water requirements), etc. And it's being done now! One LCO in London did 1000 soil tests and reduced his pesticide sprays by 94%. This is what London wants!

We started a Turf supply business (**Turf Logic**) here in NS using the aforementioned horticultural principles. We now have distribution across Canada, work with many LCOs, cities and universities in BC, Ont. and the Maritimes and they don't need synthetic pesticides to have great turf. Interestingly, the LCOs involved are making good profits. We developed a turf care course called **The Logical Approach** (the instructor is a Certified Horticultural Technician, holds almost all available Ont. pesticide licenses, is a pesticide examiner and oversees 2 LC companies – 1 is "IPM" and the other is organic) which even PLCAO (Professional Lawn Care Assoc of Ont.) has encouraged their members to take, developed a **Turf Rx** soil test system (we use a London lab) that's easy to understand for the LCO and lawn owner, we offer educational seminars to client municipal employees and develop individualized turf programs for LCOs, parks and sports fields. We also supply a broad line of organic, natural and balanced synthetic fertilizers that are safe to the environment, people and pets, and deliver good turfgrass. We do grow good strong turf!

What does London implement.....not IPM –you're being led by the nose with this one! The weed exemption excuse is not real – weeds are the easiest symptom to reduce or control with other tools. If they

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are exempted, you won't have a reduction bylaw. At the most, allow a 1 year phase-in...clean up your weeds and change your practices to prevent future weeds.

Allowing for an insect exemption is sensible for now. Grubs of all kinds can be reduced biologically with nematodes but chinch bugs can be tougher (and very damaging). For the record, chinch bugs are a symptom of a problem that is preventable. I know many in London (and here) who are surrounded by chinch bug damage, and yet their unsprayed lawn is thick and green (and it's not because of high watering).

Bringing horticulture back to lawn care means knowing soil science and fertility, plant physiology, entomology, agronomy and turf management techniques. Applying these principles will reduce drought problems by as much as 50%, reduce pests including weeds and makes for a thicker, more durable and darker green turf. Manage the soil and you will have great grass without the problems and without the pesticides.

The one-sided agendas, hyperbole, and doom and gloom scenarios that were presented to the City were troubling. Much more needs reviewing and I am available anytime to discuss this further with anyone who would be interested. Also I will be in Ontario the week of Jan. 10th. However until then I may be contacted by phone, fax or email.

Respectfully,

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