

## Ontario Golf Superintendents' Association

OGSA

ONTARIO GOLF  
SUPERINTENDENTS'  
ASSOCIATION



January 30, 2017

Pest Management Regulatory Agency  
Health Canada  
2720 Riverside Drive  
Ottawa, Ontario K1A 0K9

Dear Sir or Madam:

### **Re: Proposed Re-evaluation Decision PRVD2016-20 (Imidacloprid)**

I am writing on behalf of the Ontario Golf Course Superintendents' Association (OGSA) in response to the PMRA's proposed re-evaluation decision for imidacloprid. The OGSA represents golf course superintendents around the Province of Ontario.

Our membership is concerned that if all uses of imidacloprid are cancelled, it will have a significant impact on the turf industry. Imidacloprid is a very important insecticide that is integral to the turf industry. This chemical is required to control insects and grubs in turf such as Japanese Beetles, European Chafer, and Black Turfgrass Ataenius. Our profession cannot do without this defense against these destructive pests, which if left untreated can destroy the most important asset of the golf industry – the course itself.

Imidacloprid plays a key role in the management of insect pests on turf before outbreaks occur. Without imidacloprid, turf managers could be forced to use curative treatments repeatedly, resulting in overall increased chemical applications.

There are currently only two suitable alternative products available, Arena and Acelepryn. Eliminating imidacloprid leaves us with one fewer option for treatment, ultimately limiting our options for effective resistance management. There are new insecticides which have been submitted for approval by manufacturers that may serve as replacements in some cases, or approved insecticides that may be expanded for use, however, some of these insecticide alternatives may have cost implications, be less effective against specific pests, or be under re-evaluation themselves.

The *Pesticides Control Act* requires that products have value when used according to the label directions, and we respectfully submit that this is certainly the case in our industry. The golf course industry in Ontario is governed by legislation (mandatory IPM accreditation along with Provincial pesticide regulations), which requires golf course staff to be trained in the judicious use of such chemicals, and meticulous records are required to be kept as to their use.

The adverse ecological effects that are described by the PMRA with respect to the use of imidacloprid are unlikely to occur in golf course applications. This is due to the nature of turf itself. Turf has a dense canopy and thatch layer helps to reduce runoff and acts as a natural filter for chemicals, thus virtually eliminating the risk of chemicals finding their way to surface and groundwater.

Our industry would be willing to work with the PMRA to help find alternative risk management solutions in order to keep certain uses of imidacloprid in turf situations, including increasing the buffer zones, and creating vegetative buffer zones around existing surface water if necessary.

We thank you for your consideration of our submission addressing some of the concerns of our industry and membership. We would be pleased to speak to you in person, by teleconference, or email, in order to answer any questions that you may have regarding the position of our organization on this very important issue. I can be contacted at [cjanzen@westmountgolf.com](mailto:cjanzen@westmountgolf.com)

Yours sincerely,



Cory Janzen, President  
Ontario Golf Superintendents' Association

Westmount Golf & Country Club

Cc: Tim Muys, IPM Director,