



PESTICIDE INDUSTRY REGULATORY COUNCIL (PIRC)

Administered by the

Ontario Integrated Pest Management Association (OIPMA)

Mailing Address: 1 Renny Cres London ON N6E 2C4

Email: pirc@oipma.ca 1-800-615-9813 www.pirc.ca / www.oipma.ca



The Four Essentials For Homeowners To Have A Healthy Lawn:

PIRC members know how to improve poor homeowner lawn care cultural practices.

Encouraging good horticultural IPM activities, soil management, planting quality seed, mowing lawns at 3", and correct watering practices are daily promoted by OIPMA members. However, we cannot support legislating cultural IPM practices under the *Pesticides Act*. In contrast, we will support stakeholder annual verification of Legislation and IPM Technology updating commonly called **company IPM Accreditation**, without exclusiveness, which has been instituted by both industry councils, (PIRC or PIC), in cooperation with their affiliated established IPM council. This joint independent administration and delivery is in accordance with our long standing Memorandum of Understanding (MOU) published by the MOE at its SWAT site in these words, "The Ministry of the Environment has a Memorandum of Understanding to allow the two councils to administer licencing and certification for Exterminators and Technicians."

A healthy lawn requires four essentials: soil management, quality seed, high mowing, watering

a) How to correct poor soil management:

- The government alone has the ability to set IPM cultural topsoil requirements for residential, commercial and industrial builders if such is deemed necessary. Imposing cultural IPM soil management requirements to be carried out by professional licensed urban lawn care pesticide applicators I submit is correctly outside MOE mandated responsibility under the *Pesticides Act*. PIRC and the IPM-EHC Council and the OIPMA membership responsibly promote its substantial benefits to the public. However, we submit that such is inappropriate under the *Pesticides Act*.

b) How to correct poor turfgrass varieties selection:

- The government alone has the ability to restrict inferior turfgrass seed varieties from being sold in Ontario if such is deemed necessary. Box stores and garden centres, not the licensed industry are the most common source of poor turfgrass seed acquired by the public. Imposing cultural IPM turf grass management requirements on the professional licensed urban lawn care pest management industry is misdirected and not a MOE mandated responsibility under the *Pesticides Act*. PIRC members actively promote its substantial benefits to the public is self-evident. However, we submit that such is inappropriate under the *Pesticides Act*.

c) How to correct poor mowing height:

- The government alone has the ability to restrict lawn mowers sold within Ontario to be factory set to cut at not less than two and half inches and can be raised up to four inches (2 ½" - 4") if such is deemed necessary. Imposing cultural IPM lawn mowing requirements on the professional certified IPM industry is not a mandated MOE responsibility under the *Pesticides Act*. PIRC does promote its substantial benefits to the public but legislation in respect thereto is inappropriate under the *Pesticides Act*.

d) How to correct poor watering practices:

- Water and sewer charges and water bans are controlled by municipalities and are a major factor in urban public watering decisions of homeowners and complex managers. The above solution is clearly beyond licensed industry control. Imposing cultural IPM watering requirements on the licensed industry makes no common sense. PIRC members and OIPMA promote the substantial benefits to the public of deep watering but legislation in respect thereto is inappropriate under the *Pesticides Act*.