



PESTICIDE INDUSTRY REGULATORY COUNCIL (PIRC)

Administered by:

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The Honourable John Gerretsen
Minister of the Environment
12th Floor, 135 St. Clair Avenue West
Toronto, Ontario M4V 1P5

April 14, 2009

Email: minister.moe@ontario.ca Telephone: (416) 314-6790

Dear Minister,

Subject: How fair is it for the MOE to strip a person of their livelihood and business without notice

The PIRC asks itself, why would the MOE strip older license holders of the job that they have competently performed for decades? Why was no special mechanism put in place by the MOE to allow our older "landscape license" holders actively engaged in spider control work to earn a living and remain in business? To obtain a structural license these stakeholders need time to re-educate themselves in a different field. Notably, these affected operators were first informed of this major licence change by the MOE in a March 25, 2009 mailed out Memorandum letter.

It is also important to note that many of these license holders earlier held "Endorsed" Spider Control licenses. In 1998, under changes to Regulation 914, (now Regulation 63/09), "Endorsed spider control licenses" were phased out giving affected stakeholders several years to study and obtain a new Landscape or Structural License if they did not qualify to the renamed license classes to perform the same or similar work. The new "Landscape" license allowed, but restricted its licence holders to spray building exteriors for spiders while a structural licence was a comprehensive structural pest control licence.

The PIRC submits that it is highly unfair that Ontario's older licensed "Landscape" licence holders are not permitted to retain the rights that existed under their old license until their existing license expires or alternately allow a re-education grace period of one year. I submit to put this type of stress on our senior licensed exterminators who have served the public well for many decades is highly unfair. Notably, many of these older exterminators have for over a decade restricted their activities to exterior spider control.

In conclusion, since these licensed exterminators were not engaged in the structural pest control field, and due to their age, the PIRC pleads with the government, MOE Minister, and Cabinet to re-consider and allow a reasonable phase in for those individuals that will now suffer undue financial hardship as a result of this new regulation change notice.

Yours for a greener environment,

Gary VanderHeide

Gary VanderHeide - OIPMA Executive Director / PIRC Chair

