



September 4, 2015

TO:

Beaver River Watershed Initiative ("What Water Wants"), The Canadian Environmental Law Association, Ducks Unlimited Canada, Environmental Defense, Georgian Bay Forever, Georgian Triangle Anglers' Association, Lake Simcoe/South-Eastern Georgian Bay Clean-up Fund (Environment Canada), Niagara Escarpment Commission, Nottawasaga Steelheaders, Trout Unlimited Canada, Wasaga Beach Fish & Game Club, Conservation Ontario

Copies for information:

County of Grey, County of Simcoe, Grey Sauble Conservation Authority, Municipality of Grey Highlands, Nottawasaga Valley Conservation Authority, The Town of the Blue Mountains Township of Clearview, Town of Collingwood, South Georgian Bay Lake Simcoe Source Protection Committee

Re: Class 9 pesticide pollution

For over 20 years the Blue Mountain Watershed Foundation has been dedicated to protecting and enhancing the area watersheds encompassing over 92,000 hectares in Simcoe and Grey Counties. In 2008 a concern was brought to the Trust with respect to the impacts of potential golf course pesticide run-off on our area streams. We initiated a monitoring program and we detected Class 9 pesticides in streams flowing from several area golf courses. The Material Safety Data Sheets for all of the pesticides we detected contain precautionary statements to the effect that they are toxic to aquatic life.

Over the past six years all of the data collected from Collingwood area golf courses has been shared with the Ministry of Environment and Climate Change (MOECC) and can be viewed on our web site www.watershedtrust.ca. We encourage you to access our "Report On Watershed Pesticide Concerns" under the Current Issues tab / Golf Course Pesticide Monitoring.

The purpose of this letter is to make you aware that the MOECC has repeatedly failed to properly address our Class 9 pesticide concerns (listed below), and to ask your support in getting them addressed.

In our submissions to the MOECC we have stated the following:

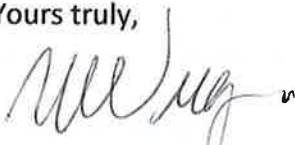
1. Some Class 9 pesticides are allowed to be used in Ontario where there is no published Provincial Water Quality Objectives (PWQO). We say that such pesticides should be banned until a PWQO is assigned.
2. Some Class 9 pesticides are not capable of being analyzed down to the level of the PWQO by any MOECC certified laboratories. Such pesticides should be banned until the concentration in runoff waters can be measured.
3. Golf courses are required under the Pesticide Act and Reg. 63/09 to publish the amounts of Class 9 pesticides they use in an annual report. This report can be submitted as many as 20 months after the application of a pesticide. That is far too late for any meaningful corrective action. We request that a more timely publishing of use should be made. We have proposed that pesticide usage should be published no later than five days after each pesticide application.
4. There is no requirement for routine monitoring of Class 9 Pesticides in runoff from golf courses. We feel a routine monitoring program is necessary to protect the health of our watercourses.

To date the MOECC has failed to properly address our concerns. The most recent response from MOECC dated August 12 has again failed to address these four simple points. We expect them to implement these recommendations or to tell us why they should not be implemented.

We ask for your comments and support in publicizing this concern and encourage you to respond directly to the Minister of the MOECC, Glen Murray, 135 St. Clair Avenue West, Toronto ON M4V 1P5 (please copy us) and request that his Ministry make the necessary changes to the Regulations to correct these obvious and serious flaws in the Ontario pesticide legislation.

If you have any questions on the above or would like to meet with us, please do not hesitate to contact the undersigned at 705 445 0357 or norman.wingrove@sympatico.ca.

Yours truly,



Norman Wingrove, President
Blue Mountain Watershed Trust Foundation
705.445.0357
norman.wingrove@sympatico.ca

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