**Agenda and discussion points for the meeting with Mike Morris Apr 23 2019:**

Crawford (introductions)

* Fact exchange/reconnaissance – what is really behind this idea of a ban?
* Find out at what stage the bill is at
  + - Within the legislature
    - Within Liberal Caucus
    - Within Riding Association
* Ask if IVMA can provide information (on herbicide use, etc) – *segue….*

Peter: Information sharing can benefit all; IVMA, Mike Morris, Constituents and the Public.

* Reduction of deciduous vegetation and browse. Where is the information coming from? *(see attached data for back up to this discussion)*
  + - Loss of habitat
    - Fire
    - Biodiversity
* FLNRO data clearly shows that deciduous inventory in stands is on the increase and has always been.
* Impacts to Moose populations – information is misrepresented *(see comments/data and studies)*

Peter: Clarification of stance on glyphosate *(see summary on Glyphosate data attached)*

* + - Where/When is it OK to use it?
    - Residual concentrations/acceptable risks. PMRA & acceptable levels.

Peter: Where is this need for a glyphosate ban coming from? What are the main drivers?

* + - Strategic?
    - Public Pressure?
    - How can IVMA help with clarity of information?

Peter: Benefits of Herbicide use:

* + - Critical to controlling invasive weeds
    - Critical to cost effective forest regeneration on some of the most critical stands to future timber supply and where there is no real alternative
    - As opposed to some alternatives the use of herbicides has important ecological advantages with positive impacts to ecosystems and water quality.
  + Avoids impacts to soil physical properties and onsite displacement of soil and organic matter thereby minimizing erosion and sedimentation of streams.
  + Avoids nitrogen losses associated with burning

* + - Worker safety (trip/fall/strain, chainsaws and brushsaws, 2 cycle exhaust gas!!)
    - Glyphosate is only one tool in the toolbox and is frequently only used selectively when circumstances permit (ie Aspen Patches > 1 hectare) which means selective impacts to habitat
    - Other tools are also used and a well considered selection process is followed before considering herbicides as a choice
    - Rigorous standards for use and a robust system of regulation to follow when contemplating use of Herbicides (IVM Program Development)
    - Ultimately a ban such as proposed would have serious downstream impacts. Is it really necessary or can we achieve the objectives by doing something else or differently?? *- Segue*

Rick: Proposed Alternatives to a Glyphosate ban: *(see notes attached for backup to this discussion)*

* + - Other methods and existing regulations could achieve the same objectives with respect to wildlife impacts (notices & orders etc)
    - Information about consultation during PMP development and NIT stage. A robust system is already in place. People need to know it exists and they will be heard.
      * Members of the public and FNs must be made aware that they can provide information about specific resources they would like to protect, and companies will take appropriate steps.

***Conversational supporting points***

***FLNRO Inventory Data Summary and Comment;***

***Why is it necessary to Control Competing Vegetation Following Harvesting in Forestry?***

* Following harvest, numerous pioneer plant species (e.g., grass, Trembling aspen, alder, fireweed, Black twinberry, Red elderberry) which are well adapted to disturbed sites and open growing conditions, easily outcompete newly established crop trees (e.g., spruce, Lodgepole pine, Douglas fir), for nutrients, light, water and growing space.

***What is really happening on the landscape?***

* Forest companies in the Interior are not in the business of logging deciduous stands and for the most part pure conifer stands are harvested.
* Any Aspen or other decidous is usually left standing or put into wildlife Tree Patches (WTPs).
* Treating Aspen as problem vegetation makes up a small portion of what gets treated and is usually done selectively (only patches of +/-1 hectare or greater). As harvesting moves further away from town and into pure Spruce/Balsam stands the target vegetation that needs to be treated is severe herbaceous competition which threatens plantation establishment on very good growing sites.
* These sites are some of the richest sites in the Province. Herbicides allow for the temporary control of vegetation to prevent damage from aggressive vegetation. Allowing these sites to become Not Sufficiently Regenerated (NSR) would have considerable negative effects on future timber supply.

***What is the current Inventory in the Timber Harvesting Land Base (THLB) Compared to Free Growing once stands are regenerated?***

|  |  |  |
| --- | --- | --- |
| *Timber Supply Area* | *Inventory on THLB*  *( TSA Discussion Papers from the Inventory Branch)* | *Inventory at FG Inventory Branch Data all licensees 5 year rolling average (Inventory Branch data which is provided to the District Managers every year)* |
| *Prince George* | 93 % conifer 7 % deciduous | 90% Conifer 10% deciduous |
| *Mackenzie* | 93% conifer 7% deciduous | 88% conifer 12% deciduous |
| *Quesnel* | 93% conifer 7% deciduous | 87% conifer 13% deciduous |

***FLNRO’s current moose research in central BC facts.***

* survival rate varied between 86% and 100% annually from 2012 to 2017.
* Aproximately half of mortalities in the study were due to predation,
* the other half were due to a variety of factors including health, hunting and accidents.
* The 11% attributed to ‘**apparent starvation**’ are currently being investigated by the provincial veterinarian since other factors, such as tooth wear and decay, parasites and disease, can cause emaciation and **apparent starvation**.

***Some Glyphosate facts to help clarify.***

* IIARC Rating as “probable human carcinogen” – rating based on hazard (the potential to cause harm) rather than risk(takes into account extend and route of exposure).
* Studies had serious methodological flaws and were greatly outnumbered by studies that showed no effects.
* The Iarc rating also includes as probable carcinogens red meat, wood fires, emissions from frying food, shift work, drinking hot beverages (>65 degrees) and hair dressing
* European Chemical Agency’s (ECHA) independent analysis determined that evidence used in IARC doesn’t meet criteria for carcinogenic classification.
* USEPA, European Food Safety Association and PMRA focus their determination on Risk not Hazard and all have concluded the Glyphosate does not pose a cancer risk to humans.
* In 2018 Health Canada (PMRA) conducted a review of its 2017 re-evaluation of glyphosate after objections were raised by environmental groups. In Jan 2019 the results were released. They concluded that ‘the objections raised did not create doubt or concern regarding the scientific basis for the 2017 re-evaluation decision for Glyphosate”. Also – “no pesticide regulatory authority in the world considers glyphosate to be a cancer risk to humans at the levels at which humans are currently exposed”.

***Proposed Alternatives to a Glyphosate ban:***

* Ensure the Government protects certain areas and or habitats which have been proven to be negatively impacted rather than a total ban (orders, notices etc – other tools exist already!!)
* Make the public and user groups (trappers, guides etc) more aware of alternative avenues for communicating concerns when industrial activities are impacting habitat in specific areas of concern
* Make legislation changes if required but only to address valid concerns that are scientifically proven
* Verify the facts; Request more validation and/or studies from Health Canada or any other government agency (MOF – wildfire branch, inventory branch) to alleviate specific concerns that would cause a ban to considered or thought of as necessary
* Work on public education and reach out to reduce the misinformation that circulates.
* Inform the public of the multiple benefits of herbicide treatments vs alternatives and actual use levels/impacts for greater public engagement and understanding

*We already have a very robust and inclusive regulatory process in place when Industrial herbicide use is being considered. Clarifying the public’s ability to participate in the PMP Development Process is a major component of these alternatives. So how can FNs and Public Protect Specific sites and Resources??*

* Members of the public and FN have the opportunity to provide concern and/or objection to treatment about specific resources they would like to protect during two phases in any commercial, governmental or industrial operation that uses pesticides under a PMP (legislated by the Integrated Pest Management Act).  They also have the right to contact the Ministry of Environment and Climate Change (MoECC) at any time to report a concern.  It is most effective to report their concerns during the following stages.
  1. PMP Development – A PMP has a life span of 5 years and during the development of any PMP the owner of the PMP has the legislated obligation to consult with FN and the public.  During this 45 day phase anyone has the opportunity to bring forward specific values that they would like to protect.  Some specific examples may be a berry patch or a specific animal habitat such as a den.  The PMP owner must consult to a point where both parties are satisfied.  If this point can’t be achieved then the Ministry of Environment becomes involved to resolve the issue. It is worth noting that concerns must be specific and cannot be blanket concerns such as “stop all spraying because it’s bad.”
  2. Notice of Intent to Treat is a legislated requirement where the PMP owner must provide the government with notice 21 days prior to spraying each year during the life of the specific PMP.  It may also be required if requested during the PMP development consultation phase that FN or the public is also notified 21 days prior to treatment. Again, the PMP owner is required to consult with the individuals with specific concerns to a point of satisfaction.  Again also, if this point can’t be achieved then the Ministry of Environment becomes involved to resolve the issue.