

February 1, 2014

NB Department of Natural Resources

Hugh John Flemming Forestry Centre

1350 Regent Street

Fredericton, New Brunswick

E3C 2G6 Canada

Dear Hon. Robichaud;

We are in receipt of a letter signed by your predecessor Hon. Northrup in response to Petition # 46 on herbicide spraying in New Brunswick tabled by Hon. Jack Carr on December 8, 2011. Most of the content of this letter, in addition to comments from the NB Department of Natural Resources and some in the forest industry contain half-truths at best, and downright manipulation of data at worst. The issue of herbicide use on publically-owned land and its impacts on our forests and wildlife is an issue that requires the understanding and input of the public in our province, and to make informed decisions, there is great need to get the facts straight.

To this end, we wish to clarify points you and others have made on this issue and to have such propaganda cease. While it may not be DNR's intent to mislead the public, statements your department and industry staff repeatedly make routinely underestimate the extent of herbicide use and the obvious impacts that glyphosate has had following repeated use for over 20 years on our publically owned land. With more updated and factual information we believe very strongly that your position on the use and impacts of herbicide will change dramatically.

For example – in this letter it is stated that “The Crown land herbicide program is essential to the future of the NB forest industry”. While we clearly understand that inflated AAC's are only possible through the strategy of high fiber yield from plantations, how you achieve high stocking rates of softwood trees – especially when alternate means can create much needed employment - is always be open for debate. Herbicide use may be the cheapest means of removing competing hardwoods, but the above statements make the grossly inaccurate assumption that it is the ONLY way. This is totally false. Men on the ground using spacing saws to remove hardwoods is a much better alternative. This issue is not about what is “essential”, but about what is most profitable. Given that the money used to remove this hardwood is TAXPAYERS money, we strongly submit that the METHOD of hardwood removal be open to public input – particularly if the use of herbicides is detrimental to other aspects of the environment.

In a climate where our province is struggling to keep skilled workers from moving west, why would we not consider a method of hardwood removal that will create many good paying jobs for rural New Brunswickers, and does not carry with it the threats and damage that herbicides cause?

The second statement that is made repeatedly by those defending the use of herbicides is the loss of jobs within the forest industry if it is discontinued. This at best is a poor prediction, and at worst is fear-mongering. We take great offence to statements like these from an industry that has eliminated far more woods workers in the name of modernization and efficiency than would ever be lost switching to a different means of hardwood control in plantations. Forestry jobs are down dramatically since logs were harvested with chainsaw and skidder, and using spacing saws will actually CREATE jobs. This issue is not about companies losing workers or going bankrupt. It is about reducing profits. Companies will still reap profits, but not quite as much as they can on the backs of a taxpayer-funded spray program. Given the negative impacts of herbicide, it is high time professionals take responsibility to look for alternative means of hardwood reduction that create jobs and stop caving in to bullying tactics used by large business.

Your statement that herbicide use is not harmful to wildlife is grossly incorrect and assumes as long as deer and other wildlife don't drink or eat it that impacts are negligible. Further, DNR Staff and the forest industry constantly suggest that because only 1% of the forest is sprayed annually, any concerns are grossly exaggerated. However, if we speak in terms that the public can understand, this picture looks entirely different. This 1% represents an area of 13,000 hectares a year – or over 26,000 acres. This land mass is equivalent to an area as wide as a Terry Fox run (10 kilometers) running from Fredericton to Saint John (130 km). That is one huge piece of real estate. From a deer's perspective, an acre of regenerating land can produce between 20,000-40,000 stems of hardwood, equaling a ton of deer food per acre. Deer consume on average 2 kg of this browse daily, so in effect, herbicide spray removes at least 26,000 tons of deer food a year from Crown land. We believe this provides much insight into vacant deer yards on Crown land. This has been done for 20 years. In reality, by using this form of hardwood removal you are responsible for the removal of nearly a half a billion tons of deer and moose food from the public forest the past 20 years – definitely not insignificant. This sprayed 1% a year - after 20 years adds up to almost ¼ of our Crown land in monoculture.

We have a forest management strategy that has slowly and steadily contributed to the demise of the Crown land deer herd. This is not news to the hunting community – they have seen it for years and this is behind much of the frustration they have repeatedly voiced to DNR staff for years. However, rather than scientists and biologists crunching the numbers and looking into this issue and its impacts on wildlife, it appears easier to simply send out a letter blindly stating there is no harm using glyphosate on such a small amount of land. Now that deer have been forced to private land where good deer food still grows, large forestry companies believe they have licence to clearcut the last remaining mature forests on our public land that is tied up and protected in deer yards.

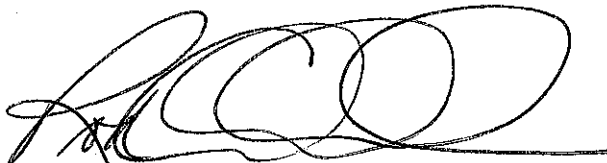
Another statement in the aforementioned letter that is used in ignorance is "studies following herbicide application in softwood plantation have shown the same species representation as before treatment". While this statement may have silenced people who don't understand scientific studies, we have looked into both the actual plantation stocking rates of DNR regeneration data as well as forestry based glyphosate studies. BOTH of these show emphatically that the vast majority of treated plantations in our province are 90-100% stocked with softwood trees and that glyphosate is by far the most effective herbicide for killing hardwood species and removing them **permanently** from treated sites. Not only

does field data and forestry-based glyphosate research bear this out, but anyone who has driven by plantations, walked through them or flown over them know for a fact that this statement is an outright lie. Dropping from 30,000 stems per hectare to several hundred they may technically qualify to still be "represented", however you have drastically and permanently changed the make-up of the Acadian forest for an entire human generation.

The remainder of this letter relies on the federal government's regulation of this herbicide. It fails to mention the current review being done by this agency on Glyphosate in view of emerging research that has revealed numerous problems with its use. It also fails to mention that both Nova Scotia and Quebec have discontinued the use of glyphosate for similar reasons. Glyphosate use has also been discontinued by major NB cities including our capital. If this herbicide is so safe, can you explain why so many agencies and jurisdictions are abandoning its use?

Using glyphosate on Crown land the past 20 years has had a dramatic effect on the structure of the Acadian forest – as has been pointed out by a federal research expert in our province. Its use has been questioned by an award winning forestry researcher at UNB. It has dramatically reduced the Crown land carrying capacity for deer and forced the future growth of our herd onto the backs of taxpayers of this province who own the lion's share of private land; municipalities and farmers bear the brunt of nuisance wildlife damage at their own expense while you defend the use of this product so forestry companies can realize higher profits on the backs of a taxpayer-subsidized chemical application program and at the expense of creating jobs for rural New Brunswickers.

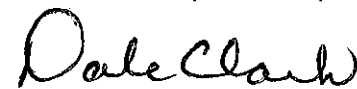
We are confident that when the average New Brunswicker realizes these details along with the growing body of research that has been ignored in letters such as the one we are replying to, this issue will take on a whole new importance in the next provincial election.



Rod Cumberland, CWB Retired Provincial Deer Biologist; *PRESIDENT, CENTRAL NB QUALITY DEER MANAGEMENT ASSOCIATION*

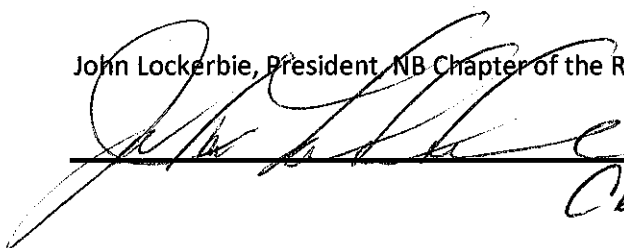


Charlie Leblanc, President, New Brunswick Wildlife Federation



Dale Clark, President, New Brunswick Professional Outfitters and Guides Association

John Lockerbie, President, NB Chapter of the Ruffed Grouse Society



CEO RGS CANADA



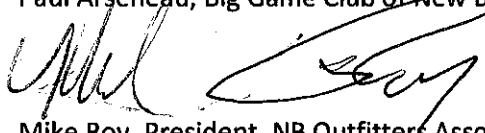
John Craft, President, Bowhunters of New Brunswick



Tracy Glynn, Conservation Council of New Brunswick



Paul Arseneau, Big Game Club of New Brunswick



Mike Roy, President, NB Outfitters Association

CC: Hon. David Alward, Premier & All Members of the Legislative Assembly
