## The Conversation Continues on the Precautionary Principle

## To the editor:

With interest I've been following [your] discussion of the Precautionary Principle.

I can appreciate the concerns expressed by Larry Wilson of the NY Alliance for Environmental Concerns. His probing questions suggest a "misplaced" and "ill fit" of how the Precautionary Principle is obfuscated by impressionable and misguided politicians. I could not agree more, especially where politicians in Quebec, Ontario and Ottawa "skewed" the principle to coincide with their views to justify anti-pesticide actions.

In short, the Canadian judgements came after the activists in Canada adopted the contorted anti-pesticide American activists' agenda and strategy as their own. [As a] result (and without adequate industry opposition) frightened policymakers yielded to further restrict pesticide use. Unfortunately, and imprecise Precautionary Principle or "Precautionary Policy" using a few questionable anti-pesticide studies (without challenge to the contrary) offered cover and enough cause that [politicians] believed sufficient to alter policy that's negative to lawn care.

The current adaptation of the Precautionary Principle has fault. There appears to be no clear recognized consensus by scientists, regulators and politicians as to what constitutes the components, and their relative weight, in an operating model to work from in the risk assessment analysis. I agree with Dr. Suzanne Snedeker that "sound science" must be central to the Principle. If following this undertaking in Canada, then sharp peer review and critique should have been used in a better and more clearly defined Precautionary Principle to dissuade authorities from proceeding further against lawn care. Over the past four years since Albany enacted 48-hour lawn care neighbor notification, the New York State Lawn Care Association has repeatedly been confronted in county after county with professional anti-pesticide activist tirades holding up the Precautionary Principle as good reason that pesticide use should be further restricted. It's uncomfortable to hear these folks define their Precautionary Principle as the standard for perceived risk assessment and [a claim] based on any suggestion of harm is enough for more restrictive policy.

Equally distressing, these same protagonists say society cannot trust nor accept reputable, authoritative and prevailing science from universities. They claim university findings are too easily compromised or tainted by beholding to research dollars from industry. And for industry, even less confidence because monetary selfinterest overrides trustful research. So, like in Canada, another "P" principle reigns supreme, the Political Principle.

In my view, the Precautionary Principle should be understood primarily as the sciencebased process component in evaluating risk assessment and not the ultimate arbiter for policy.. Politics should not be part of the process where there's too much temptation for bias. Otherwise, if included, science becomes degraded and even meaningless. Distinctly separate, and after Precautionary Principle findings, the final policy determination and responsibility rests (as it should) with appropriate regulatory and political officials. A science-based Precautionary Principle serves as a tool in the risk evaluation process—open to scrutiny and questions [based on] established standards. What's politically "in" or "fashionable" at the moment should not be an integral part of this process.

> Donald W. Burton New York State Lawn Care Association

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## Readers Respond

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