



November 7, 2011

File: Licence 14443

Robert Brewer  
Wilderness Vegetation Management  
494 Hwy 17, Unit 6  
Heyden, ON  
P6A 5K7

Dear Sir:

**Re: Notice of Non-Compliance with the *Integrated Pest Management Act and Regulation***

This letter is written in follow-up to a report of a possible violation of the IPM Act and Regulation forwarded to the Ministry of Environment by Wilderness Vegetation Management on July 8, 2011, and a subsequent inspection conducted by the Ministry of Environment on July 26, 2011. This letter serves as a report of our findings and a notice of non-compliance with the *Integrated Pest Management Act and Regulation*.

**Background**

The Ministry of Environment received an email from Chad Horton dated July 8<sup>th</sup>, 2001 regarding a possible violation of Pesticide Free Zones (PFZ's) under the Integrated Pest Management Act and Regulation along the Canadian Pacific (CP) rail line Cascade subdivision, in the vicinity of Mile 119.

In response to that notification, Jeff Fournier and I inspected several sections of the CP mainline in the company of Wilderness employee Chad Horton and a CP rail track supervisor on July 26, 2011.

We observed that the applicator conducted an extra-wide ballast application through this area. Instead of a narrow "between the rails only" treatment that was prescribed (1.5m spray width from track centre), it appears that the applicator "kick" sprayed the right-of-way and has impacted vegetation as far away as 8 m (slope distance) from the tracks in some locations. At that time we were advised that this treatment was contrary to instructions received by CP rail.

Following the inspection a phone interview was conducted with the applicator Paul LeBoeuf. He confirmed that the kicker was used along this track section contrary to instructions received from CP rail, and that appropriate buffer zones were likely missed along streams.

Based on the visual evidence (dry and distressed vegetation, epinasty) and verbal confirmation from the applicator there has been significant encroachments into the PFZ in multiple locations, and it appears that there is a strong likely-hood that glyphosate has been directly input into several streams.

### The Violations

Based on our observations and measurements, Wilderness Vegetation Management has been found to be in violation of the following sections of legislation;

#### **Violation of Section 73(1) of the *Integrated Pest Management Regulation*:**

**73(1)** Except as provided in sections 74(1) and (2), a licensee, for the purposes of a pesticide use described in section 5(1), and a confirmation holder, for the purposes of a pesticide use for which the confirmation is required, must ensure that minimum 10m pesticide-free zone is maintained around or along bodies of water, dry streams and classified wetlands.

**74(1)** A licensee for the purposes of a pesticide use described in section 5 (1) (a), (b), (k) or (l) and a confirmation holder for the purposes of a pesticide use described in section 24 (2) (a), (b) (f) or (g) using glyphosate, may reduce the pesticide-free zone required under section 73 (1) as follows:

- (a) to 2 m along or around a body of water or a classified wetland that is fish bearing or that drains directly into a fish bearing body of water or a dry stream that when wet is fish bearing or drains directly into a fish bearing body of water

- (i) if the treatment area is

- (A) railway ballast, signal, switch or yard, or

- (B) another industrial site that must be free of vegetation, or

- (ii) if the pesticide is applied using selective application methods;

- (b) except as provided in section 77 (2), to 5 m along or around body of water or a classified wetland that is fish bearing or that drains directly into a fish bearing body of water or along or around a dry stream that when wet is fish bearing or drains directly into a fish bearing body of water, unless the treatment area is described in paragraph (a) (i);

- (c) except as provided in section 77 (2), to a 2 m no-treatment zone along or around a body of water if the body of water is not fish bearing at any time of the year and does not drain directly into a fish bearing body of water.

**74(2)** A person described in subsection (1), despite that subsection, may apply glyphosate

(a) up to but not below the high water mark of temporary, free-standing bodies of water, and

(b) over dry streams that are not fish bearing at any time of the year and do not drain directly into a fish bearing body of water.

### Conclusion

This Notice is the minimum enforcement response to violations of the *Integrated Pest Management Act and Regulation*. This notice, the violations and the circumstances to which it refers will form part of the compliance history of Licence 14443 and may be taken into account in the event of future violations.

In your response to us dated October 24, 2011, we note that Wilderness has indicated its intention to create a specific pre-spray and safety checklist that all applicators will be required to review with a CP employee (pilot) and submit to their office daily for management review.

It is our expectation that these and any other actions required to prevent further violations under the *Integrated Pest Management Act and Regulation* will be undertaken.

If you require further information, please feel free to contact me at 604-582-5342.



Scott Bennett, R.P.F.  
Pesticide Management Officer  
Lower Mainland and Vancouver Island Regions

cc (email only): David Spata, Canadian Pacific Railway



August 17, 2012

File: 56050-25/FEES GEN  
Pesticide licence number: 14443

Mr. Robert Brewer  
dba Wilderness Environmental Services  
930-3025 Lougheed Hwy  
Coquitlam BC V3B 6S2

Dear Mr. Brewer:

**Re: Notice of Non-Compliance with the *Integrated Pest Management Act* and Regulation**

This letter is written as a follow-up to the discovery of a possible exceedance of your license maximum treatment during work conducted in 2011. This letter also serves as a notice of non-compliance with the *Integrated Pest Management (IPM) Act* and Regulation.

**BACKGROUND**

On May 15, 2012, Ministry staff reviewed your 2011 Annual Use Summary (AUS) and discovered that you reported application of pesticide totalling 1951.15 ha. You clarified through email correspondence that some of the applications were tank mixes and the total area treated was actually less than the total of all products reported. However, there is sufficient evidence to conclude that, even though the actual total is less than what is indicated on the AUS, you have exceeded your license category maximum of 500 ha. For example, you reported using two different glyphosate products over approximately 500 ha (485.99 and 495.33 ha).

Despite numerous requests by this office for your company to provide clarification, you have failed to provide any additional evidence in the past three months that would explain how this activity did not contravene sections of the *Integrated Pest Management Act* and Regulation.

**SUMMARY OF NON-COMPLIANCE**

Application above a license category maximum without notifying this office and making the additional payment is a violation of the IPM Regulation. Based on the information provided, I have determined that Robert Brewer (license no. 14443) dba Wilderness Environmental Services is in non-compliance with the following sections of the *Integrated Pest Management Act* and Regulation:

1. IPMA S. 3(1)(b) Without limiting any other provision of this Act, a person must not (b) use, handle, release, transport, store, dispose of, or sell a pesticide other than in accordance with this Act and the regulations;

2. IPMR S. 47(1)(c) Within 30 days after a change in any information provided by the licensee in an application under section 45 [*licence applications*], the licensee must give written notice to the administrator of the change;
3. IPMR S. 13(8) If a licensee is required by the term and condition in section 47 (1) (c) [*licence terms and conditions*] to give notice to the administrator of a change that has the effect of increasing the fee payable in relation to the licence, the notice must be accompanied by the amount of the increase.

## REQUIRED ACTIONS

The Ministry of Environment is requiring a written response to this letter including a request to modify your license application for 2011 to apply to more than 500 ha per year and submission of the outstanding balance. This submission is to be received in our office before September 17, 2012.

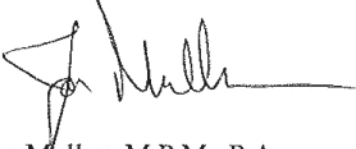
## CONSEQUENCE OF INADEQUATE RESPONSE

Upon receiving your written response to this letter and subsequent payment, Ministry staff will amend your previous license. In the event that your company should fail to carry out satisfactory action by the indicated date, there are a number of compliance and enforcement options available to the Ministry of Environment. These options include, but are not limited to, the issuance of violation tickets, licence suspension, licence revocation, and the recommendation of formal charges. These options take into consideration previous compliance history and your company's willingness to undertake voluntary compliance to ensure the regulatory requirements outlined in this letter are met.

Please ensure you make yourself aware of your 2012 treatment activity and notify this office of an amendment request if you plan to exceed the 500 ha limit of your current license category.

Should you have any questions please contact the undersigned at (250) 387-9416.

Yours sincerely,



Jon Mullan, M.P.M., P.Ag.  
Pesticides Officer – Large Industry Specialist  
Integrated Pest Management Program

cc: Jerry Daoust, IPM Officer, Ministry of Environment Prince George Office  
Chris Nunn, IPM Officer, Ministry of Environment Surrey Office  
Andreas Wins-Purdy, IPM Officer, Ministry of Environment Penticton Office



August 6, 2013

File: Licence 14443

Robert Brewer  
Wilderness Vegetation Management  
494 Hwy 17, Unit 6  
Heyden, ON  
P6A 5K7

Dear Sir:

**Re: Notice of Non-Compliance with the *Integrated Pest Management Act and Regulation***

This letter is written in follow-up to two complaints of possible non-compliance received by the BC Ministry of Environment, and a subsequent site inspection conducted by a Pesticide Management officer. This letter serves as a report of our findings and a notice of non-compliance with the *Integrated Pest Management Act and Regulation*.

### **Background**

The Ministry of Environment received a complaint on May 18, 2013, and a second complaint on May 27, 2013 regarding possible violations of the *Integrated Pest Management Act and Regulation* in the vicinity of the City of White Rock BC, along the New Westminster subdivision of the BNSF railway between Mile 121 and 122.

In response to these complaints, those sections of the BNSF railway were inspected by myself in the company of BNSF consultant Stuart Craig, and BNSF rail track supervisor Ernie Arneson on June 13, 2013.

We identified two sections of the right of way along the White Rock promenade which had been sprayed that were not intended to be treated. The public had access to these areas, and no signage had been placed. Based on visual evidence (footprints) it also appears that at least one person was able to access the area before drying of the applied product (Vantage XRT) or the Restricted Entry Interval (REI) time had elapsed. The applicator, licensee, consultant, and BNSF all indicated that the error was a mistake on the part of the applicator 'pushing the wrong button'.

During our inspection and interviews with the parties involved, I found that the applicator did not have ready access to detailed maps or the Pest Management Plan, and that he was not specifically aware of what areas required Pesticide Free Zones or special management considerations. I also found that the applicator exhibited deference to a BNSF employee that was not a certified applicator. In addition, although the applicator informed his supervisor and BNSF that an overspray had occurred, no precautions were subsequently taken to ensure no unprotected human exposure took place.

### **The Violations**

Based on our observations and interviews, Wilderness Vegetation Management has been found to be in violation of the following sections of legislation;

#### **Violation of Section 7 of the *Integrated Pest Management Act*:**

- 7** (1) A person must not use or authorize the use of a prescribed pesticide or class of pesticides, or use a pesticide for a prescribed use, unless
- (d) the person who uses the pesticide acts, in relation to all matters related to that pesticide use, strictly in accordance with the information provided in the pesticide use notice.

#### **Violation of Section 71 of the *Integrated Pest Management Regulation*:**

- 71** (1) A licensee, for the purposes of a pesticide use for which the licence is required, and a confirmation holder for the purposes of a pesticide use for which the confirmation is required, must do all the following before the pesticide use:
- (a) ensure that each individual who will be using the pesticide is informed of
    - (i) the boundaries of the proposed treatment area.
- 71** (2) A person described in subsection (1) must ensure that the following precautions are taken in carrying out the pesticide use:
- (a) precautions to prevent unprotected human exposure to pesticide.

### **Penalty**

By way of this letter you are warned that;

A person who is convicted of an offence under this Act is liable to a fine of not more than \$200,000 or imprisonment for 6 months, or to both, and if convicted of a subsequent similar offence, to a fine of not more than \$400,000 or to imprisonment for 6 months, or to both.

A corporation that is convicted of an offence under this Act is liable to a fine of not more than \$400,000, and if convicted of a subsequent similar offence, to a fine of not more than \$800,000.

Also your attention is directed to Section 27 of the *Integrated Pest Management Act*. If a corporation commits an offence under this Act, an employee, officer, director or agent of the corporation who authorized, permitted, or acquiesced in the offence commits the offence, whether or not the corporation is convicted.

In addition, under Section 15 of the IPM Act the administrator may revoke or suspend the licence and under Section 23 the administrator may levy an administrative penalty.

### **Conclusion**

This warning letter is the intermediate level enforcement response to a violation of the *Integrated Pest Management Act*. This warning, the alleged violations and the circumstances to which it refers will form part of the compliance history of Wilderness Vegetations Management, Licence 14443, and will be taken into account in the event of future violations.

The Ministry of Environment notes that this is the second non-compliance Wilderness has been involved with regarding an overspray within the last two years which would suggest a systemic issue or problem. It is incumbent upon Wilderness Vegetation Management and its staff to take immediate and appropriate action to ensure that non-complaint actions are prevented from occurring.

If you require further information, please feel free to contact me at 604-582-5342.

A handwritten signature in black ink, appearing to read 'S. Bennett', with a long horizontal stroke extending to the right.

Scott Bennett, R.P.F.  
Pesticide Management Officer  
Lower Mainland and Vancouver Island Regions



---

**From:** Wins-Purdy, Andreas H ENV:EX  
**Sent:** November 6, 2017 10:32 AM  
**To:** 'RBrewer@WildernessEnvironmental.com'  
**Cc:** 'Matthew.Daubert@WildernessEnvironmental.com'; Mariotto, Manuel R ENV:EX  
**Subject:** Inspection report and referral for investigation  
**Attachments:** Robert Brewer dba Wilderness Environmental Services - Notice of Investigation.pdf

Dear Robert Brewer,

Please find attached to this email an inspection report and referral to the Conservation Officer Service for investigation in relation to recent pesticide applications on CN Rail lines and yards.

Please do not hesitate to contact either myself or Senior IPM Officer Manuel Mariotto if you have any questions relating to this report. Your company's prompt response to requests for records and other information is appreciated and is noted in the report. A hard copy of the report will follow.

Sincerely,

Andreas Wins-Purdy, M.Sc., P.Ag.  
Integrated Pest Management Section Head  
Ministry of Environment and Climate Change Strategy  
Desk: (250) 490-8257  
Cell: (250) 462-6385



Report date: November 3<sup>rd</sup>, 2017  
Report number: 070734

File: 56050-30/14443

Via email and registered mail

ROBERT BREWER dba WILDERNESS ENVIRONMENTAL SERVICES  
UNIT 6 - 494 HWY 17  
AWERES TOWNSHIP, ON P6A 0E4

Dear ROBERT BREWER dba WILDERNESS ENVIRONMENTAL SERVICES,

**Re: An Investigation Referral, *Integrated Pest Management Act* pesticide user licence number 14443, ROBERT BREWER dba WILDERNESS ENVIRONMENTAL SERVICES**

Between October 11<sup>th</sup> and October 25<sup>th</sup>, 2017, Ministry of Environment and Climate Change Strategy Integrated Pest Management compliance staff conducted both an on-site and an office review inspection under the *Integrated Pest Management Act* (IPMA) and Regulation of pesticide applications conducted by pesticide user licence number 14443, ROBERT BREWER dba WILDERNESS ENVIRONMENTAL SERVICES.

For your information, this inspection record is being referred to the Conservation Officer Service for investigation.

**Inspection Details:**

<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Act</b> 4 (1)(c): Except as provided in the regulations, a person must not (c) provide or offer to provide any service respecting pesticides, unless the person (e) holds the licence that is, under the regulations, required for that purpose, and (f) complies with the terms and conditions in or attached to that licence
---------------------------------	---

<b>Details/Findings:</b>	<p>In response to a complaint from the public, inspections of herbicide-damaged vegetation along Canadian National Railway Company's rights of way between Prince Rupert and Terrace were conducted by Senior IPM Officer Manuel Mariotto on October 11th and 12th, 2017 (photos 1-6 appended to report). All inspection activities, including photos taken, were conducted from the shoulder of Hwy 16, and indicated that herbicides had recently been applied to the vegetation on the rail right of way.</p> <p>Between October 19<sup>th</sup> and October 25<sup>th</sup>, 2017, Pesticide Use Records from Robert Brewer dba Wilderness Environmental Services were inspected for pesticide applications conducted between August 22nd and September 5th, 2017, on Canadian National Railway Company railway rights of way and yards in multiple areas in BC, including Fort Nelson, Fort St. John, Dawson Creek, Prince George, Nechako, Bulkley, Telkwa, Skeena, and Lillooet.</p> <p>A total of 1851 hectares of land was treated with non-excluded pesticides: 232.5 ha of mainline ballast, 1583.5 ha of mainline right of way, and 35 ha of yards. A total of 3828 kilograms of pesticides were applied: 1328 kgs of Arsenal (Pest Control Products Act Registration number 30203, active ingredient imazapyr), 86 kgs of Milestone (P.C.P. # 28517, active ingredient aminopyralid), 2135 kgs of VP480 (P.C.P. # 28840, active ingredient glyphosate); and 279 kgs of Clearview (P.C.P. # 29752, active ingredients aminopyralid and metsulfuron-methyl).</p> <p>Robert Brewer dba Wilderness Environmental Services holds valid pesticide user license #14443 with the categories of Industrial Vegetation &amp; Noxious Weed - General, Pesticide User- Service, and pesticide use on more than 500 ha a year.</p>
<b>Compliance:</b>	In
<b>Requirement Description:</b>	<p><b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b></p> <p>46 (1): For the purpose of section 5 (2) of the Act, the duties that a licensee providing a service using a class of pesticides prescribed in section 15 [pesticides prescribed in relation to certified individual] must ensure are performed by a certified individual are the following:</p> <p>(a) be present when the service is provided; (b) either (i) perform the use, or (ii) supervise, in accordance with section 59.3 [supervision requirements], not more than 4 assistant applicators who perform the use.</p>

<b>Details/Findings:</b>	<p>Pesticide Use Records inspected indicate that 1558 hectares were treated with non-excluded pesticides by certified applicator Brandon Houle (certificate number 204371, category industrial vegetation and noxious weeds, expires May 2018) and certified applicator William Blackwood (certificate number 198249, category industrial vegetation and noxious weeds, expires April 2021). Records also indicate that 226 hectares were treated with non-excluded pesticides by uncertified applicator Mike Brier, and 21 hectares were treated with non-excluded pesticides by uncertified applicator Blake Millroy.</p> <p>Ministry records indicate that Mike Brier wrote and failed the exam for the certificate category of INDUSTRIAL VEGETATION &amp; NOXIOUS WEED – GENERAL on April 27<sup>th</sup>, 2017, receiving a mark of 51% on his exam. A minimum of 60% is required to obtain a one-year certificate. In an email received on October 30<sup>th</sup>, 2017 from Matt Daubert, Division Manager for Wilderness, Mr. Daubert indicated that the company was aware that Mike Brier had failed his exam, but that a different applicator, Tyler Brewer, was present for all of Mr. Brier's applications. Mr. Daubert indicated that the company believed that Mr. Brewer had a valid certificate during this time, however as a result of the Ministry's inspection activities the company became aware that Mr. Brewer's certificate in the INDUSTRIAL VEGETATION &amp; NOXIOUS WEED – GENERAL category had expired on April 19<sup>th</sup>, 2017.</p> <p>The Ministry does not have any records of certification or exam results for Blake Millroy.</p>
<b>Compliance:</b>	Out
<b>Requirement Description:</b>	<p><b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b></p> <p>35 (1)(a): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (a) if the use was performed as a service, the name and address of the person for whom the service was performed;</p>
<b>Details/Findings:</b>	None of the pesticide use records inspected included the name and address for whom the service was performed
<b>Compliance:</b>	Out
<b>Requirement Description:</b>	<p><b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b></p> <p>35 (1)(b): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (b) if the service was performed for another licensee or a permit or confirmation holder, the number of the person's licence, permit or confirmation;</p>
<b>Details/Findings:</b>	Canadian National Railway Company was not an authorization holder at the time of pesticide application
<b>Compliance:</b>	Not Applicable

<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(c): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (c) if the use was not performed as a service, the name and address of the owner or manager of the treatment location;
<b>Details/Findings:</b>	Not applicable – pesticide application conducted as a service
<b>Compliance:</b>	Not Applicable
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(d): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (d) the name and certificate number of the pesticide applicator certificate holder who used the pesticide or supervised the use;
<b>Details/Findings:</b>	Applicator name was recorded for applications conducted by a certified applicator. Certificate numbers were not recorded in any pesticide use records inspected
<b>Compliance:</b>	Out
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(e): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (e) the date and time of the pesticide use;
<b>Details/Findings:</b>	All Pesticide Use Records inspected contained a date and time of pesticide use
<b>Compliance:</b>	In
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(f): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (f) the name of the pest targeted by the use or the purpose of the pesticide use;
<b>Details/Findings:</b>	Name of the pest targeted or purpose of the pesticide use was not recorded on any pesticide use records inspected.
<b>Compliance:</b>	Out

<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(g): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (g) the trade name of each pesticide used and its registration number under the federal Act;
<b>Details/Findings:</b>	All Pesticide Use Records inspected contained the trade name and PCP number of the products applied
<b>Compliance:</b>	In
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(h): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (h) for each pesticide used, the method and rate of application and the total quantity used;
<b>Details/Findings:</b>	Pesticide Use Records inspected included the method, rate, and total quantity of pesticide used
<b>Compliance:</b>	In
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(i): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (i) if the use was outdoors, the prevailing meteorological conditions including temperature, precipitation and velocity and direction of the wind;
<b>Details/Findings:</b>	Pesticide Use Records inspected included temperature, wind speed, and wind direction. Precipitation not applicable.
<b>Compliance:</b>	In
<b>Requirement Description:</b>	<b>Integrated Pest Management Act, Integrated Pest Management Regulation (604/04) (IPMA)</b> 35 (1)(j): A licensee who uses a pesticide, other than a wood preservative, must keep a record containing the following information for each treatment location and day of use: (j) pest monitoring methods and injury thresholds used to fulfill the licensee's integrated pest management requirements in relation to the use;
<b>Details/Findings:</b>	Pesticide Use Records inspected did not include any pest monitoring methods nor injury thresholds used to fulfill the licensee's integrated pest management requirements
<b>Compliance:</b>	Out

*Please be advised that this inspection report may be published on the provincial government website within 7 days.*

**Compliance History for Robert Brewer dba Wilderness Environmental Services:**

**November 7th, 2011** - Notice of Non-Compliance under the Integrated Pest Management (IPM) Act and Regulation for violation of the Pesticide-Free Zone requirements under sections 73 and 74 of the IPM Regulation.

**August 17th, 2012** - Notice of Non-Compliance under the Integrated Pest Management (IPM) Act and Regulation for an exceedance of the maximum number of hectares allowed under the licence.

**August 6th, 2013** - Warning letter under the IPM Act and Regulation for violation of Section 7 of the IPM Act and Section 71 of the IPM Regulation - failure to take adequate precautions to prevent unprotected human exposure to pesticides.

**Further notes:** It is noted that the authorization holder was very cooperative and prompt in providing records and information related to this inspection.

Below are attachments related to this inspection. If you have any questions about this letter, please contact the undersigned.

Yours truly,

Manuel Mariotto, RPF  
Senior Integrated Pest Management Officer

**Attachments:**

- 1) Photo 1 - herbicide-damaged vegetation along CN Rail line (east of Basalt Creek, along Hwy 16).JPG      Photo 1
- 2) Photo 2 - herbicide-damaged vegetation along CN Rail line (30 m West of Basalt Creek, along Hwy 16).JPG      Photo 2
- 3) Photo 3 - herbicide-damaged vegetation along CN Rail line (West of Kyex River, along Hwy 16).JPG      Photo 3
- 4) Photo 4 - herbicide damage to conifers along CN Rail line (east of Basalt Creek, along Hwy 16).JPG      Photo 4
- 5) Photo 5 - herbicide-damaged vegetation on CN Rail line (east of Kyex river, along Hwy 16).JPG      Photo 5
- 6) Photo 6 - herbicide-damaged vegetation on CN Rail line (east side of Kyex river, along Hwy 16).JPG      Photo 6

**Deliver Via:**

**Email:** ☒

**Fax:** ☐

**Mail:** ☐

**Reg Mail:** ☒

**Hand Deliver:** ☐

**DISCLAIMER:**

Please note that the sections of the authorization or regulation referenced in this inspection record are for guidance and are not the official version. Please refer to the original authorization or regulation.

To see the most up to date version of the *Integrated Pest Management Act* and Regulation please visit <http://www.bclaws.ca>

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization, therefore compliance is noted only for the requirements or conditions listed in the inspection record.





Img : Photo 1 - herbicide-damaged vegetation along CN Rail line (east of Basalt Creek, along Hwy 16).JPG



Img : Photo 2 - herbicide-damaged vegetation along CN Rail line (30 m West of Basalt Creek, along Hwy 16).JPG



Img : Photo 3 - herbicide-damaged vegetation along CN Rail line (West of Kyex River, along Hwy 16).JPG



Img : Photo 4 - herbicide damage to conifers along CN Rail line (east of Basalt Creek, along Hwy 16).JPG



Img : Photo 5 - herbicide-damaged vegetation on CN Rail line (east of Kyex river, along Hwy 16).JPG



Img : Photo 6 - herbicide-damaged vegetation on CN Rail line (east side of Kyex river, along Hwy 16).JPG