



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

March 19, 2018.

Publications

Pest Management Regulatory Agency,

Health Canada,

2720 Riverside Drive,

A.L. 6607 D

Ottawa, ON

K1A 0K9

Dear Minister,

**Re: Proposed Pollinator Decisions for the Neonicotinoid Pesticides
Clothianidin and Thiamethoxam (PRVD2017-23 and PRVD2017-24,
PRD2017-17 and PRD2017-18)**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

Farmers work to produce safe and healthy food in a way that allows for efficient production, while also protecting the health of their plants, soils, and the environment around them. Farmers depend on a variety of methods and tools, including insecticides, to help them control pest problems that put their production at risk.

Insecticides need to be used responsibly and should not be employed prophylactically where an increased environmental risk, such as to pollinators, is identified. However, where there is a demonstrated need and a significant value, especially economic benefit, to farmers, greater consideration needs to be given as to how best to balance selective use with potential negative impacts.

The reviews of thiamethoxam and clothianidin have carefully considered the potential impact of exposure risks to pollinators (especially honey bees) from the various crops, application methods, and other secondary exposure risks these may create for pollinators. However, what has not been as carefully considered is the value of these extensive and various uses of thiamethoxam and clothianidin for all the different crops where they are currently used in Ontario. It is not possible to appropriately weigh value against risk when the full value has not been considered, especially where the most stringent restriction, removal of use, has been proposed.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

Value of Thiamethoxam and Clothianidin

Health Canada needs to fully evaluate and fairly consider the value of the uses of thiamethoxam and clothianidin for those crops and use-cases which are proposed for removal of use.

The section on the value of thiamethoxam notes that “it is considered to be a valuable tool for resistance management” especially since it is effective on “a broad spectrum of insect pests on a diverse range of agricultural crops and ornamentals.” Further benefits come from the fact that it protects the whole plant and can be applied in a number of different ways at different stages of plant growth, and thus at different stages of insect pest life cycles (PRVD2017-24 pg. 30). Identical comments are made about Clothianidin on pg. 26 of PRVD2017-23 including mention of its use for turfgrass instead of ornamentals.

The research reviewed for the Re-evaluation decision examined a number of different crops and different use cases. From these two examinations, recommendations have been put forward for both thiamethoxam and clothianidin on termination of use, new restrictions on use, or new label requirements depending on the determined risks.

The most stringent changes being recommended are termination of use of thiamethoxam for use as a soil application on outdoor fruiting vegetables (such as tomatoes and peppers), strawberries, cucurbit vegetables (including cucumbers), other low-growing berries and for greenhouse plants intended for future outdoor use. Likewise, foliar applications of thiamethoxam are recommended to be removed for pome and stone fruits, low-growing berries (except strawberry), and outdoor and greenhouse ornamentals intended for future outdoor use, as well as all during-bloom foliar applications (PRVD2017-24 pg.36).

In the case of clothianidin, the most stringent changes being recommended are termination of use for “foliar application on orchard trees and strawberries” and “foliar application to municipal, industrial and residential turf sites” (PRVD2017-23 pg. 3).

The “Value” sections in both PRVD2017-23 and PRVD2017-24 give no specific discussion of the value of thiamethoxam or clothianidin for any of these above listed uses of the product which are proposed to be terminated. This is a significant omission, since it is precisely the value of these uses which will be most impacted by the proposed decision to terminate use in these cases. Conversely, the “Value” section discusses in much more detail the value of both of these noenicitinoids for soybean and corn production, especially through seed treatment, where either no changes or only label changes are proposed regarding seed treatment use cases.



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

Mitigation Measures

In the case of thiamethoxam and clothianidin, the CFFO requests that Health Canada further investigate appropriate use cases for agriculture that would ensure sufficient protection of pollinators, but not require a complete ban on the use of the insecticide in these use cases where a ban has been proposed. We also request that the time period for testing and establishing proven alternatives to replace thiamethoxam and clothianidin for these use cases be established to allow transition away from these neonicotinoids to effective alternatives.

Within agriculture, thiamethoxam and clothianidin are used for a diverse variety of crops, in both greenhouse and outdoor conditions, and are effective in addressing a number of different pests. In some cases, one or the other is currently the only effective treatment for some agricultural pests, and in other cases, they are one important choice among limited options for farmers.

In order to effectively manage pest problems, and in order to prevent the development of pest resistance, farmers need to have a variety of effective pest control tools at their disposal. A complete ban on the use of thiamethoxam or clothianidin for some crops could have significant negative effects in creating situations where farmers are unable to control pest problems, either from the lack of effective controls, or from the development of pest resistance from reliance on a single method of control.

Farmers in the United Kingdom are currently requesting emergency use of neonicotinoid pesticides after a ban on their use has resulted in significant insect pest pressures from flea beetles.¹ A complete ban in Canada could create similar problems for certain crops.

Global Competitiveness and Imports

The competitive world market for many farm products means that Health Canada should also take into consideration the economic impact that restricting pesticide use has on farmers. Restricting access to effective pesticides like thiamethoxam and clothianidin when other jurisdictions continue to allow their use for the same crops will impact farmers' cost of production, and thus their global competitiveness. Furthermore, while farmers in Canada may be restricted from using certain pesticides, often goods are imported into our domestic market from countries where use of these pesticides is still permitted. Farmers in Canada need to be kept competitive in both domestic and global markets for their farm products.

Summary

Health Canada needs to more carefully consider the value of uses of thiamethoxam and clothianidin where termination of use is being proposed. It would be worth the

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

investment to further investigate effective use-reduction or mitigation strategies for these crops that would address the pollinator risks identified in the report, while still allowing selective use of the product as a tool for agricultural pest management. Furthermore, a delay period needs to be implanted before complete termination for uses with these crops in order to test and certify effective alternatives. Restrictions on the use of thiamethoxam and clothianidin need to ensure that there are suitable alternatives available for use in the various agricultural contexts where it is currently applied.

Thank you for this opportunity to provide our comments. We appreciate your consideration of our input.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
SA

ⁱ "NFU applies for emergency use of neonicotinoids as OSR crop continues to decline." Feb. 7 2017, *Farminguk*. Online: https://www.farminguk.com/news/NFU-applies-for-emergency-use-of-neonicotinoids-as-OSR-crop-continues-to-decline_45565.html