



LONG-TERM THINKING FOR TODAY'S ISSUES

November 13, 2018

Publications
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6607 D
Ottawa, ON K1A 0K9

Dear Minister,

**Re: Clothianidin and Thiamethoxam – Risks to Aquatic Invertebrates
(PSRD2018-01 – Clothianidin; PSRD2018-02 – Thiamethoxam)**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

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. Farmers depend on a variety of methods and tools, including insecticides, to help them control pest problems that put their production at risk.

As we wrote to you regarding pollinators, insecticides need to be used responsibly and should not be employed prophylactically where an unacceptable environmental risk 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 Clothianidin and Thiamethoxam have carefully considered the potential impact of exposure risks to aquatic invertebrates from the various crops, application methods, and other secondary exposure risks these may create. However, what has not been as carefully considered is the value of the extensive and various uses for all the different crops where they are currently used in Ontario or elsewhere in Canada. Nor is there evidence of having compared the negative impacts to alternative pesticides. It is not possible to appropriately weigh value against risk when the full use value, including avoided cost of alternatives, has not been considered, especially where the most stringent restriction, termination of use, is the intended outcome.

Value of Clothianidin and Thiamethoxam

Before termination of use, there should be a full evaluation of the total and relative value of the uses of Clothianidin and Thiamethoxam. However, in these decisions, there is no specific discussion of the value of uses of the products that will be terminated. This is a significant omission, since it is precisely the value of these uses which will be impacted by the decision to terminate use in these cases.

The “Value” section for Imidacloprid (PRVD2018-12 pg.52) discusses a study done on the value of neonicotinoids for soybean and corn production, especially through seed treatment. This section acknowledges that in Canada, “as of 2013, virtually all field corn planted in Canada was treated with either Thiamethoxam or Clothianidin and greater than half of the soybean seeds planted in Canada were treated with Thiamethoxam”. While this study is highly relevant to consideration of the value of Clothianidin and Thiamethoxam for the decisions at hand, it was not discussed.

The CFFO recommends that PMRA consult with commodity organizations in Ontario connected with the crops impacted in order to assess the monetary cost of removal of use. These organizations include Ontario Fruit and Vegetable Growers Association, Berry Growers of Ontario, Grape Growers of Ontario, Ontario Fresh Grape Growers’ Marketing Board, Ontario Greenhouse Vegetable Growers, Ontario Potato Board, Ontario Processing Vegetable Growers, Ontario Fruit and Vegetable Processors Association, Ontario Tender Fruit Growers, and Ontario Tomato Seedling Growers’ Marketing Board along with the Grain Farmers of Ontario and all other affected producer groups.

In addition, further literature review or formal study of the feasibility and economic impact of the terminations may be needed to understand their potential impact more fully. Such study should not be restricted to private market values but also include the public values associated with security of safe food supply as well as human and environmental health for current and future generations.

Mitigation Measures

The CFFO requests that Health Canada further investigate alternative use cases of Clothianidin and Thiamethoxam for agriculture that would ensure sufficient protection of aquatic insects as well as sufficient crop protection for those crops where termination is planned. We also request that the time period for testing and establishing proven alternative insecticides for these use cases be sufficient to allow transition away from neonicotinoids to other effective alternatives. In some cases, neonicotinoids are 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 will 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 restricted set of alternative methods of control.

Global Competitiveness and Imports

The competitive world market for many farm products is a further reason that Canadian governmental agencies should also take into consideration the economic impact that restricting pesticide use has on farmers. Restricting access to effective neonicotinoid pesticides when other jurisdictions continue to allow use for the same crops will impact farmers' cost of production, and thus their ability to compete with imports at home and global competitiveness elsewhere.

Summary

We commend Health Canada in its efforts to manage the risk introduced by pesticides to human and environmental health. We note, however, that PMRA is not demonstrating that harm to human or ecological health has been identified as yet and therefore, we suggest that there is time to better assess the public and private implications of terminating all outdoor use of Clothianidin and Thiamethoxam. Considering only risks in isolation, without consideration of value, as PMRA has done, is unreasonable. This is because all human activity has environmental impacts and risks that we must continually take as we continue to live. As such, **risk is not an absolute value. For this reason, as for all human actions, risk associated with Clothianidin and Thiamethoxam should be assessed *relative to costs and benefits*.** In this case, there has been no consideration of benefits of use, costs of termination or of alternatives. **Furthermore, there has been no recognition of the fact that the financial impact of termination is being imposed exclusively on the agriculture sector.**

Consultation with commodity organizations and producers of those crops that would be directly impacted regarding the financial implications is crucial. It would also be worth the investment to further investigate effective use-reduction or mitigation strategies that would address the risks identified in the reports, while still allowing selective use of the product as a tool for agricultural pest management. Furthermore, if termination is inevitable, the sector needs to be consulted regarding the adequacy of the time period before complete termination of use. The industry needs sufficient time to assess the adequacy of current alternatives and time to test and certify effective new alternatives in the various agricultural contexts where Clothianidin and Thiamethoxam are 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
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