CHRISTIAN FARMERS
FEDERATION OF ONTARIO

519-837-1620
Toll-Free: (1) 855-800-0306
www.christianfarmers.org
642 Woolwich Street,
Guelph ON, N1H 3Y2

August 29, 2018

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

Dear Minister,

Re: Proposed Re-evaluation Decision – Imidacloprid and its Associated End-use Products: Pollinator Re-evaluation (PRVD2018-12)

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 review of imidacloprid has 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 imidacloprid 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 pollinator impact of imidacloprid 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, removal of use, has been proposed.

CHRISTIAN FARMERS
FEDERATION OF ONTARIO

519–837–1620
Toll-Free: (1) 855-800-0306
www.christianfarmers.org
642 Woolwich Street,
Guelph ON, N1H 3Y2

Value of Imidacloprid

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

The section on the value of imidacloprid notes that "it will control a broad spectrum of insect pests on a diverse range of agricultural crops, ornamentals and turf." 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 (PRVD2018-12 pg. 35).

The research reviewed for the Re-evaluation decision examined a number of different crops and different use cases. From these examinations, recommendations have been put forward for imidacloprid 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 imidacloprid as a foliar application for pome and stone fruits, caneberry, bushberry, low-growing berries (other than strawberry), berry and small fruit vine (other than grapes), tree nuts, and the herbs lavender and rosemary, as well as all during-bloom foliar applications and other select pre-bloom uses (PRVD2018-12 pg.49).

Likewise, soil application is proposed to be removed on legume vegetables (broad beans, fava beans, *Vicia faba* and other than these), cucurbit vegetables, caneberry, bushberry, berry and small fruit vine (other than grapes), low-growing berries (other than strawberry) and strawberry, herbs (excluding those harvested before bloom) as well as lavender and rosemary, outdoor and greenhouse ornamentals (other than cut flowers), fruiting vegetables, and greenhouse transplant vegetables intended for future outdoor use.

The "Value" section 3.0 (PRVD2018-12 pg.35-36) gives no specific discussion of the value of imidacloprid 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 impacted by the proposed decision to terminate use in these cases.

The "Value" section instead discusses a study done on the value of noenicitinoids for soybean and corn production, especially through seed treatment. This section acknowledges that in Canada, it is the other two neonicotinoids that are primarily used for this purpose, and that "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" making this study of very little relevance to consideration of the value of imidacloprid.

CHRISTIAN FARMERS FEDERATION OF ONTARIO
519-837-1620
Toll-Free: (1) 855-800-0306
www.christianfarmers.org
642 Woolwich Street,
Guelph ON, N1H 3Y2

Section 4.3 Value Considerations (PRVD2018-12 pg.52) more openly acknowledges the need for more information on the value of the uses of imidacloprid. This section notes that "comments on the feasibility of the proposed changes, and the impact on pest management practices are being requested." To this end, the CFFO recommends that PMRA consult with commodity organizations in Ontario connected with the crops impacted. 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.

In addition, further literature review or formal study of the feasibility and economic impact of the proposed changes may be needed to understand their potential impact more fully.

Mitigation Measures

The CFFO requests that Health Canada further investigate alternative use cases of imidacloprid for agriculture that would ensure sufficient protection of pollinators as well as sufficient crop protection for those crops where a ban has been proposed. We also request that the time period for testing and establishing proven alternative insecticides to replace imidacloprid for these use cases be established to allow transition away from neonicotinoids to other effective alternatives.

Within agriculture, imidacloprid is used for a diverse variety of crops, in both greenhouse and outdoor conditions, and is effective in addressing a number of different pests. 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 of imidacloprid 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.[i] A complete ban in Canada could create similar problems for certain crops.

CHRISTIAN FARMERS
FEDERATION OF ONTARIO

519-837-1620
Toll-Free: (1) 855-800-0306
www.christianfarmers.org
642 Woolwich Street,
Guelph ON, N1H 3Y2

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 imidacloprid when other jurisdictions continue to allow its 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

Heath Canada needs to more carefully consider the value of uses of imidacloprid, especially where termination of use is being proposed. Consultation with commodity organizations and producers of those crops that would be directly impacted is crucial. It would also be worth the 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 implemented before complete termination for uses with these crops in order to test and certify effective alternatives. Before restrictions on the use of imidacloprid are implemented, PMRA needs 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

CC: 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

CHRISTIAN FARMERS
FEDERATION OF ONTARIO

519–837–1620
Toll-Free: (1) 855-800-0306
www.christianfarmers.org
642 Woolwich Street,
Guelph ON, N1H 3Y2

Ontario Processing Vegetable Growers
Ontario Fruit and Vegetable Processors Association
Ontario Tender Fruit Growers
Ontario Tomato Seedling Growers' Marketing Board

---

[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