



March 24, 2017

Mr. Pat Finnigan, MP, Miramichi—Grand Lake, Lib.  
Chair, Standing Committee on Agriculture and Agri-Food  
House of Commons  
Sixth Floor, 131 Queen Street  
Ottawa, ON K1A 0A6

RE: Questions on evidence presented and included in the minutes of your March 7, and March 9, 2017 discussions.

Dear MP Finnigan,

We are writing on behalf of the Ontario Beekeepers' Association, the organization that officially represents over 3,300 Ontario beekeepers. We have reviewed the transcripts of evidence presented in your Committee meetings. We have some questions we would ask to be clarified:

Our first questions relate to evidence presented by Dr. Richard Aucoin, Executive Director, Pest Management Regulatory Agency: (1105)

"Following bee deaths linked to planting of neonicotinoid-treated seeds in 2012 and 2013, instead of moving to restrict or discontinue registrations, PMRA worked very closely with many stakeholders. For example, we worked with grain farmers, the seed industry, the provinces, and the beekeeping industry to understand and develop approaches to planting that would reduce exposure to bees. With all these mitigation measures in place, the number of incidents fell by about 80%, and that trend has continued over the last few years. This speaks to PMRA's focus on the scientific evidence as paramount in our decision-making, as well as acknowledging the important role the agriculture sector can play in risk management.

Our current assessment is that the risk to managed bees from the use of one of the neonics, imidacloprid, is manageable, although there remains substantial work to be done in this area, including ensuring there are no unacceptable risks to wild bees and other pollinators. It is important to note that the initial part of our assessment really focused on managed honey bees, for example pollination services and commercial beekeeping operations. We still have some work to do to understand whether there are any unacceptable risks to wild bees and other pollinators."

MP Finnigan, in his first statement, Dr. Aucoin states:

“Following bee deaths linked to planting of neonicotinoid-treated seeds in 2012 and 2013, instead of moving to restrict or discontinue registrations, PMRA worked very closely with many stakeholders.”

Question:

- After two years of acute bee kills, PMRA declared the current use of neonicotinoids in agriculture was “unsustainable.” With the full knowledge that widespread bee kills in Ontario and Québec were linked to neonicotinoid pesticides used broadly on corn and soy, and in light of the overwhelming supportive science coming from Europe where a moratorium was issued, why did the Director not immediately invoke the Precautionary Principle and de-register neonicotinoids for use on field crops?

Dr. Aucoin states that: “Our current assessment is that the risk to managed bees from the use of one of the neonics, Imidacloprid, is manageable.”

Questions:

- What is the definition of a ‘manageable’ risk?  
*Ontario beekeepers have seen little evidence that the threat to Ontario bees from neonicotinoids is ‘manageable’.* Beekeepers in Ontario continue to observe the negative consequences of the widespread application of Imidacloprid and other neonicotinoids, including:
  - acute bee deaths,
  - unsustainable winter losses and increased spring dwindling,
  - loss of queens,
  - low queen vitality,
  - poor (spotty) brood patterns,
  - crashing of hives in the late summer and fall,
  - high honey moisture content due to reduced bee populations

MP Finnigan, the continued widespread use of neonicotinoids continues to have a significant negative impact on the population of managed and wild bees and the ability to maintain a healthy and viable beekeeping industry in Ontario. We object to the careless use of the term ‘manageable’.

Later, Dr. Aucoin states:

“With all these mitigation measures in place, the number of incidents fell by about 80%, and that trend has continued over the last few years.”

Questions:

- What mitigation measures does Dr. Aucoin refer to?
- Are they specific to Imidacloprid?
- What evidence does he provide, i.e. what % of farmers has installed or adopted these

measures?

- What evidence does Dr. Aucoin have that actually proves that there is a reduction of wild and managed bee exposure of neonicotinoid pesticides not only from dust at planting but from exposure to nectar, guttation, pollen or ground water?
- When Dr. Aucoin refers to reduction in incidents is he actually referring to an actual incident observed by PMRA or *reported* incidents?
- Are the incidents to which he is referring small incidents of one or two hives or large incidents involving many hives and tens of thousands of bees?
- Did Dr. Aucoin explain to members of your Committee that PMRA changed their handling of 'reported' incidents?

This discussion exposes a critical distinction that may lead the Committee to a false conclusion. *Reduced numbers of reported incidents by beekeepers is not an indicator of reduced risk but a result of PMRA's changes to incident reporting procedures.* PMRA has eliminated their on-site inspection of hives with reported pesticide poisoning. They have also ceased to collect and analyze dead bees, pollen or comb samples for pesticide residue and provide valuable reports back to the beekeeper. Beekeepers used these reports to make decisions on the location of their bee yards. Since these changes were made by PMRA *there is little or no incentive for beekeepers to report incidents.*

Our members have reported several large events in 2016 in which commercial beekeepers lost an entire yard to a pesticide poisoning incident. It is misleading to equate a small with a large incident by referring to a gross number of incidents.

*Dr. Aucoin also states:*

"I would point out that for many and perhaps most—but not all—of the existing approved uses of imidacloprid, there are alternatives."

Question for the committee

- What are these approved alternatives?
- Can Dr. Aucoin provide evidence that these alternatives have been properly vetted for pollinator and aquatic insect impacts other than information supplied by the manufacturer?

*The second set of questions refers to the evidence presented on March 9 by Mark Brock, chairman of Grain Farmers of Ontario.*

Mr. Brock states (1215):

"Today there are no alternatives in the marketplace or in the technology pipeline that provide the same level of protection and safety for our farmer-members. Last year there was an introduction of a similar product into the marketplace, but it's not available for soybeans, nor does it cover the same array of insects that the three neonics do. It is also being sold at four times the cost of the neonic seed treatment, even though it provides

less protection. We have seen some Ontario farmers transition to this product, but we do not have enough years of experience to know what its weaknesses are and what it will or will not be effective against.”

Questions:

- What is the *similar product* to which Mr. Brock refers?
- Is this product registered by PMRA?
- If, as Mr. Brock says, some Ontario Farmers have transitioned to this product, has it been proven safe for bees? If so, what is the evidence to prove this?
- Has Mr. Brock considered IPM or any other alternative to the use of pesticides?
- Has Mr. Brock considered in his calculations the cost of the loss of insect pollinators to farmers who need them for successful fruit and vegetable crops?

For your information: Ontario seed dealers report that DuPont’s Lumivia seed treatment will likely replace as much as 75% of neonicotinoid seed treatments on corn and soy in Ontario this planting season. <http://www.dupont.ca/en/products-and-services/crop-protection/corn-soybean-protection/products/lumivia.html> Despite PMRA approval, studies have shown, chlorantraniliprole, the active ingredient in Lumivia, negatively effects the behaviour of bees. [https://www.researchgate.net/profile/Guy\\_Smagghe/publication/236129347\\_Dietary\\_chlorantraniliprole\\_suppresses\\_reproduction\\_in\\_worker\\_bumblebees/links/00b49517134cea545a000000.pdf](https://www.researchgate.net/profile/Guy_Smagghe/publication/236129347_Dietary_chlorantraniliprole_suppresses_reproduction_in_worker_bumblebees/links/00b49517134cea545a000000.pdf)

Mr. Brock goes on to say (1240):

“The way it usually works for corn, depending on the company a farmer would purchase seed from, is that we have the ability to buy seed that's treated with an insecticide or without an insecticide. On the neonic-treated side, it's usually around \$4 to \$5 a bag for the seed treatment. When you get into this newer seed treatment that I talked about, it could be upwards of \$25 to \$35 a bag more per unit.”

Questions for the committee:

- What is the name of the ‘newer seed treatment’ mentioned by Mr. Brock?
- What is the source of the price information for adding either neonicotinoid or an alternative seed treatment to corn seeds?

Ontario crop specialists suggest that only 20% of corn acreage requires pesticides for crop protection yet neonicotinoids have been applied to 99% of corn and 65% of soy seeds.

- What is the predicted reduction in the cost of neonicotinoid pesticides to Ontario grain farmers when it is applied only in limited quantities and only to the areas where there is demonstrable target pest activity?
- What is the potential cost saving to the individual farmer who determines that the application of neonicotinoids is not necessary?
- What is the actual cost to farmers of applying pesticides that are of no value to their crop?

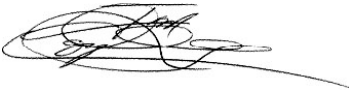
MP Finnigan, for your information some recent studies have concluded:

“For typical field situations, independent research demonstrates that neonicotinoid seed treatments do not provide a consistent return on investment.”

<http://ento.psu.edu/extension/field-crops/fact-sheet-Effectiveness-of-Neonicotinoid-Seed-Treatments-in-Soybean>

Thank you for your consideration of our questions. This issue is of immense importance to Ontario beekeepers. We await your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Coneybeare', with a long horizontal line extending to the right.

Jim Coneybeare  
President