ONTARIO BEEKEEPERS' ASSOCIATION
Since 1881

February 5, 2015

Mr. Ben Lobb, MP
Chair of the Federal Standing Committee on Health
914 Justice Building
House of Commons
Ottawa, Ontario K1A 0A6

Dear Mr. Lobb,

The Ontario Beekeepers' Association has been representing the interests of Ontario's beekeepers for over 100 years. Now representing more than 3,000 beekeepers, we are mindful of the unique threat that the overuse of pesticides poses to our environment, our food security, the heath of bees and the viability of our industry.

It has been brought to our attention that the Federal Standing Committee on Health is implementing a very quick review of the Pest Control Products Act, the law that governs the licensing of pesticides in Canada. Given the serious negative impact of neonicotinoids, which resulted from a precipitous conditional approval of clothianidin more than a decade ago, we wonder why you are undertaking such a rapid process, one that does not engage key stakeholders such as ourselves, or give the general public a chance to respond.

We believe that the government must take the time for a thorough examination of the Act, which has approved chemicals in the past that have a profoundly negative impact on the environment and on the beekeeping industry and, as in the case of neonicotinoid pesticides, which the PMRA has identified in their 2013 report as "not sustainable".

We therefore put forward the following recommendations.

**RECOMMENDATION ONE: The OBA asks for the suspension of all conditional registrations until we understand how to manage the risks posed by these products to honey bees and other beneficial insects.**

We believe the current process of conditional registrations, which mean pesticides are being used without adequate science or risk management assessment, must be discontinued. We believe this to be the only effective option to protect beneficial insects. It is our understanding that PMRA has the capacity to immediately suspend the use of pesticides when the strength of research supports such a decision. We believe that the balance of scientific evidence of the effect on pollinators and our ecosystems is compelling enough to warrant such an action.

**RECOMMENDATION TWO: Amend the Act to ensure that the need for a new pesticide be demonstrated as part of the approval process, and that this evidence is based on sound, independent research without the bias of conflict of interest**. The current practice of relying on industry-sponsored research almost certainly results in inadequate information related to the broader effects on the ecosystem, the actual value to productivity and synergistic effects with other chemicals.

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**RECOMMENDATION THREE: Improve assessment protocols for pollinator risk assessment.**

Risk assessment should include, at a minimum, testing of acute and chronic oral toxicity for adult and larval honey bees, bumble bees, and a solitary bee species, taking into account the cumulative and permanent nature of the effects on the insect central nervous systems. Acute contact toxicity testing should be conducted for adults of all three bee groups. Chronic exposure tests should last for the duration of bloom for each plant registered for use. Tests should also look at potential interactions and synergy between products encountered together in the field, such as the combination of neonicotinoids with adjuvant, fungicides, miticides used in honey bee colonies, or other products that are commonly used along-side insecticide treatments.

**RECOMMENDATION FOUR: Assessments should always include independent research to determine threats of long-term soil, water and pollinator toxicity.**

We also encourage research to understand better the effects of pesticides on other pollinators such as butterflies, moths, beetles, flies and wasps. We need to better understand the levels of exposure to beneficial insects, whether through contaminated floral resources, contaminated prey, or residues in places such as soil or leaf litter.

**RECOMMENDATION SIX: Recognize the validity of the precautionary principle as a public policy guideline to be used in the review of all pesticide applications.**

The precautionary principle is established as a public policy guideline for environmental issues in Canada as described in Environment Canada's "Planning for a Sustainable Future: A Federal Sustainable Development Strategy for Canada."

*Canada's environmental policy is guided by the precautionary principle and is reflected in the FSDS as required by the Federal Sustainable Development Act which states that the Minister of Environment must "develop a Federal Sustainable Development Strategy based on the precautionary principle". The precautionary principle states that: "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation" (United Nations, 1992) In other words, the absence of complete scientific evidence to take precautions does not mean that precautions should not be taken – especially when there is a possibility of irreversible damage....Failure to act in any of these areas threatens our natural environment, society and economy.*

We believe that this principle should be extended to all pesticides and that the precautionary principle, in itself, is sufficient grounds for decline or suspension.

**RECOMMENDATION FIVE: Establish an independent review committee to review PMRA decisions, policies and practices and advise the minister of its findings.**

We hope that you will consider modifying your process to include the response from all those with a stake in your decision.

Yours,

Tibor Szabo,
President

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