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**national farmers union**  
*In Union is Strength*

April 22, 2014

Hon. Rona Ambrose, Minister of Health  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
Postal Location: 0906C  
Ottawa, ON K1A 0K9

Dear Minister Ambrose:

**Re: Neonicotinoid Seed Treatments and the Health of Bees and Pollinators**

The National Farmers Union (NFU) represents a diversity of family farms across Canada. Our organization works towards the development of economic and social policies that will maintain family farms as the primary food producers in Canada. The NFU believes agriculture should be economically, socially and environmentally sustainable.

As farmers, NFU members are deeply committed to working with nature to both produce healthy food and to protect and enhance biodiversity within and surrounding our farms. By building our knowledge and skills in organic, ecological, integrated pest management (IPM) and low input farm practices, we strive to protect the many organisms, including bees and wild pollinators, which provide economic benefits to our farms and contribute to a more biodiverse countryside.

The Evaluation of Canadian Bee Mortalities in 2013 Related to Neonicotinoid Pesticides, released by Health Canada's Pesticide Management Regulatory Agency (PMRA) on September 26, 2013, states that in 2012 bee mortalities in Ontario and Quebec were due to corn seed treated with neonicotinoids and that in 2013 bee mortalities in Ontario, Quebec and Manitoba coincided with the planting of treated corn and soybean seed. According to the report, "PMRA has concluded that current agricultural practices related to the use of neonicotinoid treated corn and soybean seed are not sustainable."

Currently, neonicotinoid insecticide seed treatments are applied to 95% of corn acreage and 55 – 60% of soybean acreage in Ontario, according to the Ontario Bee Health Working Group's report released in March, 2014. However, in presentations to the working group Ontario Ministry of Agriculture and Food (OMAF) crop specialists indicated that at most 20% of corn and soybean acreage actually benefits from neonicotinoid seed treatments and that in many cases other alternatives already exist. OMAF crop specialists have already identified those conditions which may result in fields being at risk from pests that can be controlled by neonicotinoid seed treatments, as well as alternative control methods for many of those fields.

At the NFU's 44th Annual Convention, November 28 – 30, 2013, the following resolution was passed:

*THEREFORE BE IT RESOLVED that the NFU will lobby the federal Health Canada for an immediate five-year moratorium on the use of the neonicotinoid class of pesticides in seed treatments for field crops.*

*BE IT FURTHER RESOLVED that the NFU call upon Health Canada to require completion of independent scientific studies, unencumbered by industry influence, on the sub-lethal and synergistic effects of neonicotinoids on honeybees, wild pollinators and other affected species, including the farmers who use them, with full results made public and available for review and comment prior to the lifting of any moratorium on the use of neonicotinoid seed treatments.*

In December, 2013 the NFU made several recommendations in response to PMRA's proposed *Action to Protect Bees from Exposure to Neonicotinoid pesticides*, including:

*The NFU recommends that Health Canada's Pest Management Regulatory Agency take the precautionary approach, rather than a risk management stance, and immediately implement a five-year moratorium on the use of the neonicotinoid class of pesticides in seed treatments for field crops.*

In the submission to PMRA we outlined why the NFU felt the proposed actions would not protect bees from exposure to neonicotinoid insecticides. Our full submission to PMRA is attached to this letter.

The NFU is asking you as Minister of Health to work with the Minister of Agriculture and the Minister of the Environment, along with provincial ministers of agriculture, environment and health to begin to implement a five-year moratorium on the use of neonicotinoid seed treatments.

Health Canada has already determined that:

- (1) neonicotinoid seed treatments in corn and soybean seed in Ontario and Quebec were the major contributor to bee mortalities in both 2012 and 2013, and
- (2) "*current agricultural practices related to the use of neonicotinoid treated corn and soybean seed are not sustainable*".

**Therefore, the NFU is requesting that you work with the Provinces of Ontario and Quebec to take the following steps immediately to:**

- Place a 5-year moratorium on the use of neonicotinoid seed treatments on corn and soybeans in Ontario and Quebec;
- Announce the moratorium as soon as possible so that it comes into effect on January 1, 2015;
- Allow corn and soybean farmers who can:
  - (1) demonstrate through a soil test or monitoring program that their crop will be threatened by pest pressure, and
  - (2) demonstrate that there are no alternative control options, to apply for a one-time use of a neonicotinoid seed treatment.
- When one-time use applications are approved, require that a permit be submitted to purchase neonicotinoid seed treatments, that the seed treatments be purchased separately from seed and that the cost of the seed and the treatment be listed separately;
- Monitor and publish a list of 'hot spots' where a significant number of farmers have applied to use neonicotinoid seed treatments;
- Widely publish recommendations for and promote alternative farming practices, such as IPM and ecological production, which can reduce pest pressure without the need for neonicotinoid insecticides. Practices which should be promoted include pest monitoring,

- more diverse and longer crop rotations and cover crops;
- Undertake publicly funded, independent field trials related to the yields with and without the use of neonicotinoid seed treatment and on alternatives to neonicotinoids, including non-chemical alternatives;
  - Monitor soil and both surface and ground water for changes in residual neonicotinoid levels prior to and after the implementation of a moratorium;
  - Monitor and count bee and other pollinator populations prior to and after the implementation of a moratorium, and
  - Compensate beekeepers for losses due to pesticide poisoning beginning in 2012 and continuing until neonicotinoid seed treatments have been removed from the market.

Health Canada's primary responsibility must be to act in the interest of the Canadian public. The biodiversity of agricultural areas in Canada is already under stress due to changes in the agricultural landscape, such as the loss of habitat for pollinators as fence rows are removed and pasture fields are turned into cash crops. It is imperative for the well-being of all Canadians that Health Canada put effective measures in place that will truly protect bees and other pollinators, starting with the actions outlined above which will lay the groundwork for a full moratorium on the use of neonicotinoid seed treatments on field crops in Canada.

For more information contact the NFU office at [nfu@nfu.ca](mailto:nfu@nfu.ca) or 306-652-9465 or Ann Slater, NFU Vice President (Policy) at [aslater@quadro.net](mailto:aslater@quadro.net) or 519-349-2448.

Yours sincerely,

[original signed by:]

Jan Slomp  
NFU President

Enclosure: NFU Submission to PRMA **Regarding Notice of Intent NOI2013-01: *Action to Protect Bees from Exposure to Neonicotinoid Pesticides***

cc: Hon. Gerry Ritz, Minister of Agriculture  
cc: Hon. Leona Aglukkaq, Minister of Environment  
cc: Provincial Ministers of Agriculture, Environment and Health