



March 7, 2018

The Honourable Jeff Leal
Minister of Agriculture, Food and Rural Affairs
11th Floor
77 Grenville Street
Toronto, Ontario M7A 1B3

The Honourable Chris Ballard
Minister of the Environment & Climate Change
11th Floor, Ferguson Block
77 Wellesley Street West
Toronto, Ontario M7A 2T5

The Honourable Kathleen Wynne
Premier of Ontario
Minister of Intergovernmental Affairs
Legislative Bldg, Rm 281
Queen's Park
Toronto, ON M7A 1A1

Re: Lack of progress on neonicotinoid pesticide reduction and protection of insect pollinators

Via email: Chris Ballard (minister.moecc@ontario.ca)
Jeff Leal (minister.omafra@ontario.ca)
Kathleen Wynne (premier@ontario.ca)

Dear Ministers Leal and Ballard, and Premier Wynne,

I am writing on behalf of Ontario's beekeepers, Ontario's beekeeping industry and the health of Ontario's wild and managed bees.

Ontario's beekeepers, many of whom keep bees in proximity to field crops treated with neonicotinoid pesticides, continue to suffer low honey yields, unsustainable colony losses and a myriad bee health problems, such as spring and fall dwindling and queen losses.

In 2014, the government of Ontario took a bold step toward protecting its insect pollinators from the effects of a highly toxic pesticide that was linked by PMRA to bee kills and colony losses. At the time that the legislation regulating neonics was put in effect, 99% of corn and 60% of soy acreage were being treated, despite the fact that Ontario crop specialists estimated that only 20% of acreage was threatened by the target pests.

Ontario passed legislation for the reduction in the use of these pesticides with an aspirational target of 80% reduction by 2017. ***However, the latest data published by MOECC for 2017 have shown only a 22% decrease in the treated acreage of corn and 16% reduction for soy, signalling a significant shortfall in achieving the government of Ontario's goal for the reduction of the use of neonicotinoid pesticides on field crops.***

Growing Season	Acreage Corn 1	Acreage Treated Seeds 2	% of acreage nni treated seeds	Reduction in acres of nni seeds	Yields bu/acre 1	Reduction in Yield vs. 2014 baseline
2014	2,108,700	2,003,265	99%		171	
2015-16	2,025,000	1,636,364	81%	18%	159	- 7.1%
2016-17	2,120,000	1,635,957	77%	22%	167	- 2.1%
	Acreage Soy 1	Acreage Treated Seeds	% Treated Seeds	Reduction	Yields bu/acre 1	Reduction in Yield vs. 2014 baseline
2014	2,930,000	1,904,500	60%		46.8	
2015-16	2,710,000	1,371,476	51%	9%	45.9	- 1.9%
2016-17	3,075,000	1,341,108	44%	16%	46.5	- 0.6%
1. Area, Yield, Production and Farm Value of Specified Field Crops, Ontario, 2012 - 2017 http://www.omafra.gov.on.ca/english/stats/crops/estimate_new.htm						
2. Corn and soybean neonicotinoid-treated seed data https://www.ontario.ca/data/corn-and-soybean-neonicotinoid-treated-seed-data						

The source of the problem points to lack of enforcement of the regulations. By allowing Certified Crop Advisers to both recommend and sell neonic-treated seeds, there is an inherent conflict of interest and no incentive to recommend non-neonic-treated seeds. As well, there is no adequate system of field inspections to verify paper work to ensure farmers and seed dealers are abiding by the regulations. Perhaps in the absence of independent verification, an upper limit of 20% per farm should apply to all sales of treated seeds.

In contrast, Québec recently announced protocols to ensure that certified agronomists are recognized and involved in the management of high risk pesticides. It's time for Ontario to review its reporting and enforcement protocols.

The good news (see chart) is that despite a 22% reduction for corn and 16% reduction for soy in the use of neonic-treated seed (by acreage) in 2017, we have seen minimal effect on the yields (bushels per acre) of corn and no real effect on soy yields.

Last year the OBA recommended changes to MOECC sales reports filed by seed dealers. Sales of seeds not treated with Class 12 neonicotinoids are mistakenly reported as untreated; whereas it is likely a high percentage of seeds could be treated with alternative pesticides, such as the popular Lumivia systemic. Seed dosage rates are not reported, whereas farmers may be increasing the concentration of neonicotinoids in order to pre-empt the loss of access to neonics and thereby nullifying gains in acreage reduction. As well, there is no way to evaluate the use of fungicides applied to seeds. The existing sales report does not ask for application of fungicides to treated and non-treated seeds. Fungicides have been shown to synergistically increase the toxicity of neonics. Once again we ask MOECC and OMAFRA to correct these exclusions from their sales reports.

Class 12 as it has been defined includes restrictions to seed treatment of corn and soy only. We also ask that Class 12 be extended to include popcorn, sweet corn, seed corn and the 950,000+ acres of winter wheat planted each year in Ontario.

Finally, while reported incidents of bee kills are down, it is because beekeepers have no incentive to report losses. PMRA no longer samples bees, pollen or comb. There is now no mechanism by which beekeepers can determine the source of exposure when pesticide poisoning is suspected. We urge both MOECC and OMAFRA to work with beekeepers to create a program to provide resources to monitor, analyze and measure sources of acute and chronic poisoning as observed by beekeepers. Without this data we cannot say with certainty what new or existing pesticide continues to poison our colonies, or to determine its source.

We appreciate Ontario's efforts to date to make pollinator health a priority. We write today in the hope that we can move forward and achieve our stated goals for pollinator health. Together we can ensure that beekeeping in Ontario remains a sustainable business and we will protect the insect pollinators that are so vital to our environment and Ontario's local fruit and vegetable production.

Sincerely,



Jim Coneybeare
President

cc: Sherry Persaud, Senior Policy Advisor, Minister's Office, OMAFRA
Sarah Rang, Director of Policy, Minister's Office, MOECC