



October 31, 2014

## Comments on Proposed Registration Decision PRD2014-20 Flupyradifurone

***“Flupyradifurone may pose a risk to bees, non-target beneficial arthropods, and freshwater and saltwater invertebrates when used for foliar application. Flupyradifurone may pose a risk to birds and small wild mammals when used for soybean seed treatment.”***

It is of grave concern to us that PMRA would be considering approving another systemic pesticide before the current review on neonicotinoids is completed. We are also concerned about the limited and poorly communicated plan and timeframe for responding to this potentially damaging chemical.

What is especially troubling is that, in its own description, PMRA states flupyradifurone ‘may pose a risk to bees, non-target beneficial arthropods and freshwater and saltwater invertebrates when used for foliar application.’ It further indicates that it doesn’t readily break down in water, air, or sunlight and may carry over to the following growing season. When it enters streams, rivers and wetlands, ‘it may persist for a long time.’ Like neonicotinoids, flupyradifurone is a nerve poison, acutely toxic to bees if ingested. And as with other pesticides, the cumulative and interactive effects from the increasing use of pesticides, fungicides and other chemicals being applied indiscriminately across the country are currently unknown.

The Ontario Beekeepers’ Association is concerned that these pesticides are being approved without adequate independent science on the immediate and lasting impact. The Government of Canada must assume some liability related to the subsequent impact on individual beekeepers as well as the beekeeping industry.

We call on the Government of Canada to employ the Precautionary Principle, as outlined in Health Canada’s Decision-making Framework, and thereby delay approval of flupyradifurone.