



September 24, 2015

The Honourable Rona Ambrose, M.P.
Minister of Health
House of Commons
Ottawa, K1A 0A6

Dear Minister,

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the Pest Control Products Act, has granted full registration for the sale and use of Isoclast Active, Transform WG Insecticide, and Closer Insecticide containing the technical grade active ingredient sulfoxaflor for use of field vegetable, cereal grain, oilseed, fruit and nut crops.

PMRA's registration decision states, "*An evaluation of available scientific information found that, under the approved conditions of use, the product has value and does not present an unacceptable risk to human health or the environment.*"

In light of the recent United States Court of Appeals for the Ninth Circuit ruling which reversed the Environmental Protection Agency (EPA's) approval of sulfoxaflor, citing that the EPA relied on "flawed and limited data" to approve the unconditional registration, and that approval was not supported by "substantial evidence", we are asking PMRA to suspend any and all conditional or unconditional registrations of sulfoxaflor until it can be proven to be safe for bees and other beneficial insects.

PMRA stated in its consultation document: "*When sulfoxaflor is applied as a foliar spray, this compound will move from the surface of the leaf to the internal leaf tissue. Sulfoxaflor can be deposited directly on pollen and nectar if applied when plants are in bloom. Sulfoxaflor is systemic and therefore can also reach pollen and nectar through its movement inside the plant. When spray droplets reach the soil, sulfoxaflor is rapidly broken down by soil microbes. Sulfoxaflor transformation products that are formed in soil are persistent and have the potential to leach through the soil profile and enter groundwater. When sulfoxaflor enters surface water, it also breaks down in the presence of microbes, albeit more slowly than in soil.*"

Beekeepers in Ontario have seen, first-hand, the effects of systemic pesticides, and yet the PMRA document goes on to say, "*While sulfoxaflor is unlikely to pose a risk to bee colonies it may pose a potential risk to adult foraging bees exposed directly to spray droplets or to fresh residues on plants, however these effects are relatively short lived, lasting approximately three days or less.*" We doubt very much that there is credible, independent research that confirms that the effects on foraging bees lasts only *three days or less*.

We can look to the U.S. Court's ruling for a different analysis. "*In addition to needing studies on brood development and long-term colony strength, it is clear that the EPA was lacking sufficient data on the impact of sulfoxaflor generally even at the reduced application rate of 0.09 pounds of*

active ingredient per acre. The EPA had only portions of two studies evaluating the effects of sulfoxaflor at that rate....On the basis of studies submitted, the EPA lacked substantial evidence to support its conclusions that application of sulfoxaflor at a rate of 0.09 pounds per acre would not have an unreasonable adverse effect on the environment.”

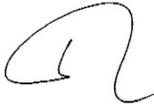
Likewise, we believe that PMRA has insufficient information to conclude that, *“When the risk reduction measures included on the label are followed, risks to bees are considered to be acceptable.”* And later, *“the risk to bees is not of concern.”*

In fact, the risk to bees is of great concern, not just to beekeepers, but also to those concerned about the environment. We have reviewed study after study – indeed, dozens of studies - on the sublethal effects of systemic pesticides such as sulfoxaflor on bees, which do not appear to have been considered in PMRA’s analysis.

We ask that PMRA consider the U.S. Court of Appeals conclusion, *“In this case, given the precariousness of bee populations, leaving the EPA’s registration of sulfoxaflor in place risks more potential environmental harm than vacating it,”* and suspend the registration of sulfoxaflor immediately.

We look forward to your response.

Yours,



Tibor Szabo, President
president@ontariobee.com

cc: Richard Aucoin, Executive Director, PMRA
Connie Hart, Senior Science Advisory, PMRA
Karen Eatwell, Ontario President, NFU
Beatrice Olivastri, CEO, Friends of the Earth
Nick Bakish, Chair, Sierra Club Canada
Peter Robinson, CEO David Suzuki Foundation
Paula Lombardi, Siskinds LLP