

Talking Points from the National Farmers Union
for the Public Consultation
Pollinator Health: A Proposal for Enhancing Pollinator Health and
Reducing the Use of Neonicotinoid Pesticides in Ontario
EBR Registry: 012-3068

Background: On November 25, 2014 the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) and the Ministry of the Environment and Climate Change jointly released *Pollinator Health: A Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario*. Comments on the proposal can be submitted up until January 25, 2015. Details on how to comment are below.

The government's proposal includes both regulatory and non-regulatory actions intended to reduce the use of neonicotinoid-treated corn and soybean seed by 80 percent by 2017 and to strengthen the health of domestic and native pollinators. Proposed non-regulatory government actions include:

- more focus on Integrated Pest Management (IPM) through workshops for farmers, agri-business and certified crop advisors;
- publication of a *Guide to Early Season Field Crop Pests* and a pest evaluation checklist to help farmers determine the risk to their fields from early season insect pests;
- working with the seed industry to make more non-insecticide treated seed available and;
- promoting practices to reduce contaminated dust during corn and soybean planting season.

Proposed regulatory actions include:

- restricting the sale and use of neonicotinoid-treated corn and soybean seed;
- allowing the sale and use of neonicotinoid-treated seed under certain conditions including:
 - the completion of IPM training for growing corn and soybeans;
 - documentation of steps taken to reduce pest threats through IPM;
 - completion of a credible risk assessment that demonstrates the need for neonicotinoid-treated seed and;
 - verification of the assessment by a third party.

More information on the provincial government's proposal and its discussion paper are available on the Environmental Bill of Rights (EBR) Registry at www.ebr.gov.on.ca. The EBR Registry number for the Pollinator Health proposal is 012-3068.

National Farmers Union (NFU) Position on Neonicotinoid Seed Treatments:

On May 1, 2014 the National Farmers Union appeared before the Senate Standing Committee on Agriculture and Forestry as part of the Committee's study on *The Importance of Bees and Bee Health*. The NFU's recommendations included the following:

- Governments should follow the precautionary principle¹ when regulating the use of neonicotinoid insecticides.
- Regulatory decisions on pesticides, including neonicotinoids, must be based on independent, third-party, publicly-funded research conducted in the public interest.
- The use of neonicotinoid seed treatments on corn and soybeans in Ontario should be restricted. The use of neonicotinoid-treated corn and soybean seed should only be permitted if farmers can (1) demonstrate through a soil test or monitoring program that their crop is threatened by pest pressure and (2) demonstrate that there are no alternative control options.
- Increase support for Integrated Pest Management programs run in the public interest for the public good and designed to benefit farmers and agricultural and natural ecosystems.
- Increase government support for research on and promotion of alternative and ecological farming practices which do not depend on the use of chemical insecticides. Options could

- include longer and more diverse crop rotation and an increased use of cover crops.
- Increase government support for activities and practices which create and maintain natural areas within agricultural regions to increase biodiversity across the landscape and to provide habitat for bees and native pollinators.

The NFU also submitted comments and recommendations to Health Canada's Pest Management Regulatory Agency (PMRA) on December 10, 2013, as part of their public consultation on the proposed *Action to Protect Bees from Exposure to Neonicotinoid Pesticides*.

The recommendations to the Senate Ag Committee and PMRA were based on the following resolution passed by NFU members at the NFU's 44th Annual Convention, November 28 – 30, 2013.

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 calls 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 to be made public and available for review and comment prior to the lifting of any moratorium on the use of neonicotinoid seed treatments.

The NFU recognizes that neonicotinoids are used on many field and vegetable crops as both seed treatments and foliar sprays. Honey bees are part of the formal agricultural system, and as such, their populations and health are tracked more consistently than those of other pollinators. Wild and native pollinators, including bumblebees, butterflies and wasps are also important to our agricultural and natural ecosystems. They also need to be protected. The NFU recognizes that bee health is a complex issue but acknowledges that exposure to neonicotinoids contributes to the loss of bees.

The NFU Submission to the Senate Agriculture Committee on May 1, 2014 can be found at www.nfu.ca/policy/2014. The NFU December 10, 2013 submission to the PMRA can be found at www.nfu.ca/policy/nfu-briefs-2013.

Scientific Studies/Research on which the NFU's Recommendations to the Senate and to PMRA are based:

- In September, 2013 PMRA "concluded that current agricultural practices related to the use of neonicotinoid treated corn and soybean seed are not sustainable".ⁱⁱ
- According to Tracey Baute, OMAFRA Field Crop Entomologist – Program Lead, almost 100 percent corn, 80 percent of soybean and 35 percent of wheat acres in Ontario were planted with neonicotinoid-treated seed prior to 2014.ⁱⁱⁱ
- Despite the widespread use of neonicotinoid-treated seed, Tracey Baute and Greg Stewart, OMAFRA Corn Industry – Program Lead, say that neonicotinoid-treated seed only benefits ten to thirty percent of Ontario's corn and soybean acres.^{iv}
- A literature review of independent peer-reviewed studies released by the U.S.-based Center for Food Safety in March, 2014 showed that "in many cases, the compounds [neonicotinoids] are not providing yield or economic benefit to farmers."^v
- On October 15, 2014 the U.S. Environmental Protection Agency (EPA) released the results of their analysis on the use of neonicotinoid seed treatment in soybeans. They concluded "that these seed treatments provide little or no overall benefits to soybean production in most situations."^{vi}

- OMAFRA specialists have identified other means, and sometimes more effective means, to control most of the pests targeted by neonicotinoid-treated corn and soybean seed.^{vii}
- The Task Force on Systemic Pesticides – a group of global independent scientists - released their findings and recommendations on the continued use of neonicotinoids in June, 2014. The Task Force "strongly suggests that regulatory agencies apply more precautionary principles and further tighten regulations on neonicotinoids".^{viii}
- A number of studies have concluded that neonicotinoids have adverse sublethal effects on both honey and bumble bees. Sublethal effects include interference in orientation, homing, mobility and foraging behaviours.^{ix}

The Ontario Beekeepers Association has links to other research and studies on their website at <http://www.ontariobee.com/issues-and-advocacy/ongoing-issues-and-actions/spring-2012-bee-poisonings>.

Additional points you may want to address in your comments:

- Farmers are often chose to purchase neonicotinoid-treated seed as an 'extra insurance' against loss of production due to insect pests. Crop insurance programs consider insect infestation an insured peril, but only if good farm management practices are followed. OMAFRA needs to work with Agricorp to ensure that Corn and Soybean Insurance Programs recognize IPM as a good farm management practice. As farmers move to the use of corn and soybean seed that is not treated with insecticides, they must have confidence that if they experience production or crop loss due to insect infestations, the loss will be covered under crop insurance.
- Your own experiences growing corn and soybeans using ecological practices, such as more complex rotations, incorporating livestock into your farm and using cover crops.
- Food sovereignty acknowledges the right of both those who grow and harvest food and those who eat the food we harvest to determine our food and farming systems. Through out commitment to food sovereignty, the NFU welcomes input from the public in discussions of our food system and farming practices, including input on the Pollinator Health proposal.

How to submit your comments on the Ontario Government's Pollinator Health proposal:

- Email your comments to PollinatorHealth@Ontario.ca.
- Submit your comments through the EBR Registry. Go to www.ebr.gov.on.ca, EBR Registry Number 012-3068.
- Send a copy of your comments to:
 - Your own MPP. Ask to meet with your MPP to discuss your position.
 - Hon. Jeff Leal, Minister of Agriculture, Food and Rural Affairs
 - Hon. Glen Murray, Minister of Environment and Climate Change
 - Hon. Kathleen Wynne, Premier of Ontario
 - Mr. Toby Barrett, Conservative Agriculture Critic
 - Ms. Lisa Thompson, Conservative Environment Critic
 - Mr. Jim Wilson, interim Conservative Leader
 - Mr. John Vanthof, NDP Agriculture Critic
 - Mr. Percy Hatfield, NDP Environment Critic
 - Ms. Andrea Horwath, NDP Leader

Contact information for MPPs can be found at ontla.on.ca/lao/en/getting-involved/contact-an-mpp/.

- i The precautionary principle calls on public authorities to act to prevent irreversible harm when it is within their power to do so, even when there is not complete scientific certainty. Canada has signed onto the principle through several international treaties, including the 1992 United Nations Conference on Environment and Development. This conference is also known as the Rio Earth Summit.
- ii Health Canada, Evaluation of Canadian Bee Mortalities in 2013 Related to Neonicotinoid Pesticides, Interim Report as of September 26, 2013.
- iii Phair, John, "Bee kills present complex research puzzle", Ontario Farmer. April 22, 2014. p. 16, 17 B
- iv Stewart, Greg, Corn Industry-Program Lead, OMAF and MRA Guelph, and Tracey Baute, Field Crop Entomologist-Program Lead, OMAF and MRA Ridgeway, "Neonicotinoids and Field Crop Production in Ontario" presentation to Ontario Bee Health Working Group Forum, August 19, 2013, accessed at www.omafra.gov.on.ca/english/about/beehealthpresentations.htm.
- v Stevens, Sarah and Peter Jenkins, "Heavy Costs Weighing the Value of Neonicotinoid Insecticides in Agriculture", Center for Food Safety, March, 2014. p. 4.
- vi U.S. Environmental Protection Agency, Office of Chemical Safety and Pollution Prevention, "Benefits of Neonicotinoid Seed Treatments to Soybean Production", October 15, 2014. Accessed at <http://www2.epa.gov/pollinator-protection/benefits-neonicotinoid-seed-treatments-soybean-production>, December 10, 2014.
- vii Stewart and Baute, Ibid.
- viii The Task Force on Systemic Pesticides, "Worldwide Integrated Assessment on Systemic Pesticides", Media Briefing Notes. June 24, 2014. p.6.
- ix Environmental Commissioner of Ontario, *Managing New Challenges*, Annual Report 2013/2014. p. 53.