



**National Farmers Union**  
**Union Nationale des Fermiers**



2717 Wentz Avenue  
Saskatoon, SK S7K 4B6

p: (306) 652-9465  
f: (306) 664-6226  
nfu@nfu.ca  
nfu.ca

March 19, 2018

Pest Management Regulatory Agency Publications Section  
Pest Management Regulatory Agency (PMRA)  
Health Canada  
2720 Riverside Drive  
Ottawa, Ontario  
Address Locator: 6607D  
K1A 0K9

E-mail: [PMRA.publications@hc-sc.gc.ca](mailto:PMRA.publications@hc-sc.gc.ca)

**Comments submitted by the National Farmers Union on the  
proposed pollinator re-evaluation decisions regarding  
clothianidin and thiamethoxam  
(PRVD2017-23 and PRVD2017-24)**

The National Farmers Union (NFU) is Canada's largest voluntary direct membership farm organization representing family farmers from across the country in all sectors of agriculture. We believe that family farms should be the primary food producers in Canada. We work to promote a food system that is built on a foundation of financially viable family farms that produce high quality, healthy, safe food; encourage environmentally-sensitive practices that will protect our precious soil, water, biodiversity and other natural resources; and promote social and economic justice for food producers and all citizens.

The NFU supports Health Canada's proposed decision to protect pollinators by changing the ways clothianidin and thiamethoxam can be used.

Clothianidin and thiamethoxam are neonicotinoid insecticides which are of increasing concern due to their impacts on non-target organisms, including domestic and wild pollinators. Clothianidin and thiamethoxam affect pollinators causing death and/or impairment as a result of acute exposure and chronic exposure, at the individual level and at the population level. These insecticides are systemic. When plants are treated with one of these products, the active ingredient is absorbed and distributed throughout the plant -- including its nectar and pollen -- and is secreted through root exudates and guttation droplets. These insecticides are water soluble, allowing them to flow with groundwater and surface run-off, affecting soils in and beyond the area of application. They are persistent in soils, and thus can be taken up by plants grown in affected areas the following season.

To protect pollinators, clothianidin will be phased out for foliar application (spraying) to orchard trees and strawberries, municipal, industrial and residential turf sites. Pre-bloom spraying will be reduced to once per season for cucurbit (cucumbers, squash etc.) vegetables. The allowed use of clothianidin as a seed treatment for cereal crops will be changed to require dust control measures.



Spraying thiamethoxam will be phased out for foliar application (spraying) to ornamental crops that will result in pollinator exposure, to orchard trees, and legumes, outdoor fruiting vegetables, and berry crops before or during bloom. Soil application of thiamethoxam ornamental crops that will result in pollinator exposure will be phased out, as will soil application to berry crops, cucurbit crops and fruiting vegetables. The allowed use of thiamethoxam as a seed treatment for cereal crops and legume crops will be changed to require dust control measures.

The NFU calls for the precautionary principle to be applied in the regulation of farm chemicals to protect biodiversity, the long-term productivity of the soil, and the safety and purity of surface and ground water. The NFU also promotes using Food Sovereignty - *the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems* - as the framework for Canada's agriculture and food policies. One of the pillars of Food Sovereignty is to work with nature by optimizing the contributions of ecosystems and as a way to improve the resilience of our food system.

The alternatives to clothianidin and thiamethoxam should be understood as a broad set of strategies, not simply different agro-chemical insecticides. When pesticides are used repeatedly – and especially if used prophylactic ally, or “just in case” -- pest species quickly evolve resistance, leading to increased use of the pesticide and greater collateral damage to ecosystems.

We urge Health Canada and Agriculture and Agri-Food Canada to actively promote research and education in integrated pest management through publicly funded programs that encompass not only less toxic insecticides, but also the use of landscape-level solutions such as planting/maintaining habitat for the pests' predators; agriculture techniques such as crop rotation and tillage practices; and the use of biological controls and micro-organisms. We strongly encourage federal and provincial governments to assist farmers in adopting integrated pest management methods in order to reduce the quantity of toxic agricultural chemicals being applied to our farmland.

We also urge Health Canada to advocate for, and AAFC to fully fund public plant breeding for crop varieties that are resistant to insect pests. Wheat Midge Tolerant wheat, bred at the Crop Development Centre at the University of Saskatchewan, for example, has been very successful. Agriculture Canada's hairy canola that resists flea beetles is another example; however it has not yet been made available to farmers.

Health Canada's assessment of clothianidin and thiamethoxam impacts on pollinators was rigorous and conservative. The measures proposed to reduce impacts are necessary. We believe this proposed decision is a positive step and we fully support it. We also urge the PMRA to implement effective monitoring and enforcement to ensure compliance.

Respectfully submitted by

The National Farmers Union

