



Neonicotinoid Treated Seed and Bee Health in Canada

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Board of Directors

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About the CSTA

- 130 member companies
- Engaged in all aspects of seed and seed technology in or on the seed
 - Research, plant breeding, trait development
 - Production
 - Processing
 - Marketing
 - Trade
- 50 crop kinds
 - Garden seed to grain, oilseeds, forages and turf
- Organics to products of biotechnology
- Single grower/retailers to multi-nationals



About the CSTA

CSTA Mission

To Foster Seed Industry Innovation and Trade

CSTA's Key Strategic Goals

1. Unrestricted Trade of Seed – nationally and internationally
2. Increased Investment in Innovation
3. Efficient and Enabling Science Based Regulations
4. The Voice for the Seed Industry – A facilitator and a Leader
5. Generational and Knowledge Transfer – image of agriculture and technology and seed as a career



Neonicotinoid Treated Seed Use in Canada



Corn:

- 3.1 million acres planted
- 95+% of the acres are planted with neonicotinoid treated seed



Soybeans:

- 5.5 million acres planted
- 60% of the acres are planted with neonicotinoid treated seed



Canola:


- 19.9 million acres planted
- 99% of the acres are planted with neonicotinoid treated seed



PMRA Re-Evaluation

- Pest Management Regulatory Agency (PMRA) of Health Canada has jurisdiction over pest control products in Canada – under *Pest Control Products Act*
 - Primary objective “*prevent unacceptable risks to people and the environment from the use of pest control products*”.
 - Pre-Market Review (science-based evaluation)
 - Post-registration oversight
 - Compliance, Incident Reporting and Sales Data Reporting
 - Re-evaluation (scientific re-assessment – 15 year cycle)



- 
- Products registered are re-evaluated every 15 years. Re-evaluation began in 2012
 - **Re-evaluation includes:**
 - Thiamethoxam, clothianidin and imidacloprid
 - All uses and application methods (e.g. soil, foliar, seed treatment)
 - Acute exposures (includes treated corn/soy seed)
 - Potential for sub-lethal / chronic effects from longer term exposure
 - Value the products add to corn and soybean production
 - Re-evaluation to be completed by 2017 with an interim report released in 2015



PMRA Notice of Intent: August 2013

- Generated over 16,000 responses across Canada
- Concluded: **“Current agricultural practices related to the use of neonicotinoid treated corn and soybean seed are not sustainable”.**
- **Mandated:**
 - the use of safer dust-reducing seed flow lubricants;
 - adherence to safer seed planting practices;
 - new pesticide and seed package labels with enhanced warnings
 - updated value information be provided to support the continued need for neonicotinoid treatment



The Issue

- 2012 high number of bee deaths reported after spring planting
- >5000 hives in corn growing areas of Ontario impacted (some in Québec)
- Attributed to dust generated during planting
- 2013 PMRA updated re-evaluation to focus on risks to pollinators and value of the product
- Issued Notice of Intent establishing measures during re-evaluation
- Recently requested additional stakeholder input on the Value Assessment
- Preliminary Pollinator Risk Assessment to be completed in 2015



CSTA Action

CSTA Facilitated the creation of a value chain group:

- Grower groups
- Technology developers
- Applicators
- Seed Trade
- Equipment manufacturers
- Retailers




CSTA Action

Coalition made 5 key commitments to federal and provincial policy makers in August 2013:

1. Development and promotion of Best Management Practises
2. Additional labelling Improved technology for dust mitigation
4. Lifecycle stewardship of seed treatments and treated seed
5. Choice for farmers

Follow up letter detailing progress sent in March 2015

- 
- CSTA regularly communicates with federal and provincial Ministers of Agriculture and the Environment
 - Encourages the education, training of BMP's for Planting Treated Seed
 - CSTA continues to act as the liaison between the PMRA and the seed sector.
 - In 2014:
 - Additional labelling was added to corn and soybean seed
 - All seed companies sold Fluency Agent
 - Growers purchased enough Fluency Agent to cover all corn and soybean acres
 - More seed treatment options were available than ever before

National Bee Health Roundtable

- Formally established in October 2014
- CSTA is a founding member
- Chaired by AAFC and Canadian Honey Council
- Membership:
 - Farmer organizations from all crop kinds and horticulture
 - Apiculturists
 - CSTA
 - CropLife Canada
 - Equipment Manufacturers
 - Provincial and Federal Governments
 - Academia



Vision, mission, goals

Vision

Bees in Canada are thriving, are an integral component of the agricultural sector, and a key contributor to a healthy environment.

Mission

Facilitate the continued growth of a healthy, innovative, and profitable apicultural sector in Canada.

Goals

Identify priority issues and foster collaborative and innovative activities that help maintain a healthy honeybee population in Canada and support a competitive Canadian apicultural industry.



National Bee Health Roundtable

Roundtable has made significant progress in several key areas:

Reduction of Pesticide Exposure:

- Working Group identifying gaps to reduce exposure both in an out of hive

BMPs for Beekeepers:

- Work is underway to create a national set of BMPs for Beekeepers

Minor Use Program:

- Two new products have been given departmental priority for approvals to help beekeepers fight against Varroa mites and American foulbrood.
 - HopGuard and Lincomycin



Pollinator Health

A Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario



November 24, 2014 –
Province of Ontario
Announces
“Aspirational Goals”:

- Reduce overwintering bee mortality to 15% by 2020
- Reduce acres planted with neonic treated **corn and soybeans** by 80% by 2017





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Update on Neonicotinoid Pesticides and Bee Health

Help on accessing alternative formats, such as Portable Document Format (PDF), Microsoft Word and PowerPoint (PPT) files, can be obtained in the [alternate format help section](#).

(PDF Version - 524 K)

25 November 2014

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1.0 Bee Health

The same day that Ontario announced their intention to limit neonic use PMRA issued an updated assessment on neonic use and pollinator health.

The report concluded there is not sufficient evidence to draw conclusions regarding a link between colony effects and potential neonicotinoid exposure



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The same PMRA report went on to say that in **2014:**

- Bee death incidents during planting in Canada were down 70% from 2014
- Bee death incidents during planting in Ontario were down 79% from 2014
- 72% of the post planting colony effects were reported by only 3 beekeepers in Ontario



Senate Report on Bee Health

May 27, 2015 - Report is released

Committee heard from 85 witnesses

Report recognizes that Bee Health is complex and multi-factorial and is supported by the Bee Health Roundtable

Report made a number of recommendations, including:

- Bee imports from the US be allowed
- Bee Health Surveillance Project be funded long term
- Increased research funding
- Improving pollinator habitat and nutrition
- Implementation of the National Bee Farm-Level Biosecurity Standard in hives



Federal Versus Provincial

- Canada is divided into 10 provinces and 3 territories
- Agriculture is a shared jurisdiction between the federal and provincial governments
- Environment is also a shared jurisdiction
- The Federal government, through PMRA, has the jurisdiction to evaluate, approve, register and review pesticides and crop protection products
- Once registered a product can be used in across Canada
- Provinces have the jurisdiction to further regulate how and when federally registered crop protection products are used

Federal Versus Provincial

- PMRA is the only agency that is obligated to make decisions based on science, using a risk based approach
- One province has decided to further regulate the use of neonicotinoids
- CSTA is in regular contact with all provincial governments to educate them on the good work being done by the value chain to enhance pollinator health



Reducing the Use of Neonicotinoid Insecticides: Amendments to Ontario Regulation 63/09 under the Pesticides Act

On **March 23, 2015** proposed regulations were released for a 45 day comment period by Ontario

23,145 comments were received



On Tuesday **June 9, 2015** the Ontario government announced that the regulatory amendments had been approved and would be in force by **July 1, 2015**

The regulations are not science based and run contrary to the actions being taken by the value chain, PMRA and Senate Reports as well as the White House Pollinator Action Plan.



New Ontario regulations establish the following:

Neonic treated corn and soybean seed is now considered a pesticide:

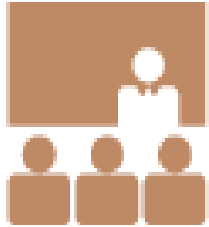
- New Class 12 Pesticide created
- Applies to imidacloprid, thiamethoxam and clothianidin
- Does not apply to sweet or popping corn or corn and soybean for seed production

New rules for farmers:

- Require training on IPM practices
- Must have 3rd party pest assessments completed to purchase treated seed

Regulations will be phased in beginning in 2015

New Ontario Rules for Corn and Soybean Growers



Beginning fall 2015 - Mandatory Integrated Pest Management (IPM) training will begin. Will be available for free of charge until September 2016



Written Declaration will be needed by growers to purchase and **use Neonicotinoid Insecticide (NNI)** treated seed for the 2016 growing season of up to 50% of total area to be planted with grain corn and 50% of total area to be planted with soybeans (calculated for each agricultural business operation)





To exceed these limits, a **soil inspection pest assessment report** will need to be completed. For the 2016 growing season, growers can complete their own pest assessment.

In 2017 Growers will be required to 1) provide their **IPM training number** to their seed vendors, 2) complete a written declaration that IPM principles have been considered and 3) complete a pest assessment in either the form of:

- 1) Soil inspection pest assessment report
- 2) Crop inspection pest assessment report





New Ontario Rules for Seed Companies

Seed Companies must apply for a Vendor License to sell treated seed:

- Cost \$200, valid for 5 years

Licence not required for:

- Direct-to-farm vendors (qualifying seed dealers)
- Sales representatives
- Custom seed treaters

Annually Seed Companies (Vendors) must submit to the Ministry of Environment:

- Sales information (neonic treated and untreated)
- Full list of all treated and untreated hybrids available for purchase



Annually Seed Companies (Vendors) must submit to the Ontario Ministry of Agriculture:

- Pest Assessment Reports that were submitted to purchase treated seed

Advertising:

- Vendors must disclose in all advertising whether the corn or soybean seeds being sold are Class 12 pesticides (neonic treated)
- When a vendor advertises neonic treated seed, they also must advertise that untreated seed is available
- A list of all neonic treated seed that the vendor intends to offer for sale in Ontario must be submitted by July 30, 2015 (and annually for 2016 and future years).



Direct to Farm Retailers

Direct-to-Farm Retailers (Vendors) may be exempt from licensing and reporting requirements.

New Ontario rules:

- Verify that purchasers of neonic treated seed have provided the required documentation when the order is placed
- Forward the required documents to the licensed Treated Seed Vendor within 30 days
- Keep records of sales of Class 12 pesticides for at least two years

Sales Representatives

Sales reps don't require vendor licenses, but they must:

- Participate in the training required by their Seed Vendor employer
- Carry company identification
- Verify that purchasers of neonic treated seed have provided the required documentation when orders are placed
- Forward the required documents to the licensed Treated Seed Vendor within 30 days
- Keep records of sales for at least two years





**For more information on the Ontario
Regulations:**

<https://www.ontario.ca/environment-and-energy/neonicotinoid-regulations-seed-vendors>

For Information about the Canadian Situation:

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