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Canadian Wildlife Federation.ca



March 18, 2019

The Honourable Ginette Petitpas Taylor, P.C., M.P. Minister of Health House of Commons Ottawa, Ontario K1A 0A6

Subject: Canadian Wildlife Federation and Canadians request prompt action to end use of neonicotinoids

Dear Minister Petitpas Taylor:

On behalf of the Canadian Wildlife Federation and its supporters, I am writing to urge you to take immediate action to end the use of neonicotinoid pesticides in Canada in response to significant evidence of serious harm.

We draw your attention to the attached petition signed by 97,636 Canadians asking for an end to the use of neonicotinoids in Canada. Neonicotinoids are among the most widely used pesticides in this country. Scientists have determined that neonicotinoids are persisting in the environment much longer than previously expected and contributing to the current significant loss of global biodiversity. They are detected in surface-water samples across Canada, a clear indication of the level of contamination that exists.

As you are aware, Health Canada's Pest Management Regulatory Agency (PMRA) proposed to phase out three neonicotinoids: imidacloprid, thiamethoxam and clothianidin due to unacceptable risk to aquatic species. The government's ecological risk assessment found that these chemicals are being measured in aquatic environments at levels that are harmful to aquatic insects, and that the continued use of these neonicotinoids in agricultural areas is not environmentally sustainable.



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As you also know, Health Canada's Pest Management Regulatory Agency was scheduled to publish the final decision on phasing out imidacloprid in December 2018, but has delayed doing so. The delay raises concerns that action will not be taken in a timely manner and extends the period of uncertainty for agricultural producers regarding how the ban will be phased in. This issue is of great concern to people in Canada. Close to one hundred thousand Canadians have signed CWF's petition in support of a timely ban on neonicotinoids. These signatures were gathered between August 2018 and February 2019. The short time frame and high number of signatories of this petition is indicative of the level to which Canadians would like to see action taken on this matter.

We therefore request that you instruct the PMRA to finalize the imidacloprid re-evaluation decision without further delay and proceed to phase out major uses, as proposed, as well as move forward on the decisions for clothianidin and thiamethoxam that would see these pesticides phased out in a timely manner.

Undoing the harm that the use of neonicotinoids has caused will require collaboration among Health Canada, Agriculture and Agri-Food Canada, and Environment and Climate Change Canada. We ask that the three responsible departments work together to address the issues created by the use of neonicotinoidss and the subsequent phasing out of these systemic pesticides. Specifically we ask that the three departments take immediate action to:

- 1. Give agricultural producers alternatives to neonicotinoids and incentives to use them: Share knowledge with farmers on alternative, less harmful pesticides and pest management technologies and techniques and provide incentives to use these, including crop insurance that protects farmers from crop failure for those who choose not to use neonics.
- Recover affected species: Address the legacy of impacts of neonicotinoid pesticides on species such as wild bees, hoverflies, aquatic insects, and other potentially affected species including species at risk such as Western Bumble Bee, Yellow-banded Bumble Bee, and Monarch Butterfly.



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3. Encourage research and development on safer pest control technologies: Support the development of pest-specific chemicals (or biological agents) with limited environmental effects and encourage the development of longer-term, directed products.

The use of neonicotinoids is an issue of concern for Canadians. Almost one hundred thousand of our CWF supporters from across the country have joined with us to seek a timely ban on the use of these harmful pesticides and we welcome the opportunity to work with government and other stakeholders as we look to transition to safer alternatives for our agricultural sector, our wildlife and Canadians.

Sincerely yours,

Rick Bates
CEO
Canadian Wildlife Federation

c.c. Honourable Catherine McKenna, Minister of Environment and Climate Change Canada c.c. Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food Canada

