



**WILDERNESS
COMMITTEE**

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The Wilderness Committee, on behalf of our 60,000 members and supporters, is writing in regards to the regulatory restrictions proposed by the Ontario government for neonicotinoid-treated soy and corn seed in Ontario.

Ontario has shown leadership by becoming the first government in Canada to take concrete steps to address declines in pollinator health. The Wilderness Committee strongly supports this initiative.

As set out in Section A of the Ontario government's discussion paper, *Pollinator Health: A Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario*, four pollinator stressors have been identified: a) habitat and nutrition, b) pesticide exposure, c) climate change and weather, and, d) disease, pests and genetics. Section B of the paper specifically focuses on reducing neonicotinoid use, and it is Section B we will be addressing in our submission.

Neonicotinoids, are a class of pesticides which disrupt the central nervous system of insects including bees, at minute doses. At slightly higher doses neonicotinoids can cause paralysis and death to pollinators. Since their introduction in the early 1990s neonicotinoids have become the most widely used class of pesticides in the world.

Designed to kill chewing pests, the U.S. National Pesticide Information Center (NPIC) shows neonicotinoids are as toxic to beneficial insects, such as honeybees and bumblebees, as they are to targeted "pests." By volume, these pesticides are up to 10,000 times more toxic than DDT, and half of bees exposed to a tiny amount – just five nanograms – will die.

In addition to causing direct mortality to bees and wild pollinators, independent peer-reviewed studies have shown that neonicotinoids also cause a range of serious sub-lethal impacts. A 2012 report from the European Environment, Public Health and Food Safety Authority revealed that even at very low doses neonicotinoids caused bees to experience the following:

- impaired memory and learning,
- disorientation and difficulties returning to the hive (loss of homing ability),
- reduced efficiency in foraging,

- less success in breeding,
- reduced resistance to disease, and
- failure to communicate properly with other bees in the colony.

Furthermore, scientists with the International Union for Conservation and Nature (IUCN) conducted an analysis of 800 peer-reviewed papers on neonicotinoids. The IUCN found, “that neonicotinoids (neonics) pose a serious risk to honeybees and other pollinators such as butterflies and to a wide range of other invertebrates such as earthworms and vertebrates including birds.” The study went one step further and said that systemic pesticides such as fipronil and neonicotinoids were so toxic they posed a, “global threat to biodiversity and ecosystem services.”¹

Nationally, Health Canada has directly implicated neonicotinoids in the death of tens of millions of honeybees in Ontario and Quebec in 2012 and 2013 after cornfields were planted with neonicotinoid-treated seeds. The subsequent investigation confirmed that neonicotinoid residue was found in 80 per cent of the 240 bee kill locations, and on 70 per cent of the bees tested. Health Canada warned, “that current agricultural practices related to the use of neonicotinoid treated corn and soybean seed are not sustainable.”²

In Ontario, this serious situation is worsened by the fact that provincial beekeepers have had higher than average bee colony mortality rates, and last year experienced a catastrophic overwintering honeybee mortality rate of 58 per cent.

Given the proven toxicity of neonicotinoids the Wilderness Committee strongly supports the Ontario government’s plan to enhance pollinator health and reduce the use of neonicotinoid pesticides.

Specifically, the Wilderness Committee urges the Ontario government to

- **Ensure** the new regulations are in place for the 2016 planting season - as proposed,
- **Achieve** the target of an 80 per cent reduction in the use of neonicotinoid-treated seeds by 2017.
- **Expand** the restriction on neonicotinoid to all Ontario crops and ornamental plants including the foliar application of neonicotinoid pesticides. Currently, the proposed regulations apply to seed applications for just two crops: grain corn and soybean. While grain corn and soybean crops represent the “greatest potential for reduction in use,” Class 12 should be expanded to capture all seeds and all pesticide products that are either currently available or could be used in the future.

¹ http://www.iucn.org/news_homepage/?16025/Systemic-Pesticides-Pose-Global-Threat-to-Biodiversity-And-Ecosystem-Services

² http://www.hc-sc.gc.ca/cps-spc/pest/part/consultations/_noi2013-01/noi2013-01-eng.php

- **Incorporate** a “demonstrated need” threshold requirement. Currently, there is no point in the process where the government may intervene and review whether the farmer or the exterminator, has, in fact demonstrated the need to use treated seeds.
- **Ensure** farmers have considered more sustainable alternative to using neonicotinoid pesticides. Farmers and exterminators must show they have considered all available alternatives and the neonic-treated seed option represents the best, or only method, to address the pest problem.
- **Require** risk assessments for pest infestation be conducted at a minimum once a year.
- **Establish** an on-line registry so the public can ascertain where neonicotinoids are used in Ontario.
- **Ensure** third-party experts are certified and independent of industry.
- **Require** farmers and exterminators to obtain a permit to use neonicotinoid-treated seeds and applications. A permit would provide a means to set limits on the duration of the permit and validity of the risk assessments.
- **Require** a reliable means to collect and assess information. Annual reports, and compliance audits, should be implemented and must be available for inspection by the public. This provision would enable better tracking of neonicotinoid usage specifically regarding frequency and location of use.
- **Plan** for the eventual phase-out of neonicotinoids on all crops and ornamental plants within five years.

Yours truly,

Gwen Barlee
Policy Director
Wilderness Committee