Agriculture is Everyone's Business

Agricultural Producers Association of Saskatchewan (APAS) Submission to the Pest Management Regulatory Agency RE: *Proposed Re-evaluation Decision PRVD2016-2* March, 2017

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Overview

Agricultural Producers Association of Saskatchewan is the province's general farm organization that seeks to provide a united voice on behalf of thousands of Saskatchewan farmers and ranchers. The following comments are provided in response to the Proposed Re-evaluation Decision PRVD2016-2 on *imidacloprid*.

The Proposed Re-evaluation Decision PRVD2016-2 on imidacloprid includes a 3 to 5 year phase out of the seed treatment ingredient, imidacloprid, due to high levels detected in water bodies and potential threat to aquatic invertebrates. Concurrent with the proposed re-evaluation decision, the Agency also announced special reviews of the actives, *Clothianidin* and *Thiamethoxam*.

These ingredients are widely used in Saskatchewan grain production as effective seed treatments for insect control. These ingredients are registered to target pests such as cutworms, wireworms and flea beetles, which pose significant production challenges in Saskatchewan. Available literature suggests that flea beetle damage in Canola crops alone cause yield losses of 10% where flea beetles are abundant and insecticide has been used. Even a one per cent yield reduction per acre represents a financial loss of about $25 - $35 million per year.

Agricultural producers are committed to the highest standards of human health and environmental safety. On behalf of its members, APAS is responding to this consultation to ensure that farm chemicals are evaluated through a rigourous and scientific risk assessment, which includes assessing the risks posed by both continued use of the seed treatments and the wide-spread adoption of alternatives should the Agency propose a phase-out of these ingredients.

Recommendations

The following recommendations focus on improving the PMRA evaluation process for evaluating imidacloprid. We further request that these recommended improvements be incorporated into any evaluation processes that may follow the special reviews of clothianidin and thiamethoxam. The recommendations include:

- That the Agency allow a degree of flexibility to ensure that there is sufficient time for data being generated during the 2017 growing season to be incorporated into the risk assessment before final re-evaluations are made.

- that the Agency align the special reviews of Clothianidin and Thiamethoxam with the establishment of a Canada-wide water monitoring program.

- that the Agency develop a regulatory impact statement to fully assess the range of consequences that will result from decisions affecting the use of these neonictanoid ingredients. This impact statement would assess the environmental, health and safety risks resulting from the increased use of alternatives chemicals.

- that the Agency consider the use of best management practices as a form of risk mitigation to allow for the continued use of the ingredients where methods have been proven effective at mitigating health and environmental safety risks.

Background

Flexibility in timelines

The proposed phase out of imidacloprid combined with the special reviews of clothianidin and thiamethoxam have garnered considerable interest among industry and government stakeholders. This interest has led to the establishment of a Multi-Stakeholder Working Group, led by Agriculture and Agri-Food Canada. The purpose of this group is to study alternatives, examine mitigation practices, and, importantly, to conduct water monitoring studies for 2017. Dialogue among the collaborating partners, including the PMRA itself, has resulted in positive discussions around the need for a long-term, Canada wide monitoring program, supported by government funding. The data and collaboration generated through this Working Group, alongside a Canada-wide monitoring program, will help ensure the PMRA evaluation decisions are informed by the highest standard of scientific rigor.

APAS requests that the Agency allow a degree of flexibility to ensure that there is sufficient time for data being generated during the 2017 growing season to be incorporated into the risk assessment for Proposed Re-evaluation Decision PRVD2016-2. APAS further requests that the PMRA consider aligning the timelines for the special reviews of clothianidin and thiamethoxam with ongoing water monitoring studies and the establishment of a Canada wide water monitoring program.

Need for a regulatory impact statement

In 2015, Saskatchewan produced 32,869,100 metric tonnes of grains and oilseeds products. Export sales of Saskatchewan grains and oilseeds were worth $11.5 Billion in export sales. Over the course of the growing season, producers invested over $3.3 Billion in chemical, seed and fertilizer products. This level of investment is required for Saskatchewan producers to maintain profitability and stay competitive in international commodity markets. Rotational constraints, a short growing season, and other environmental and economic factors limit the number of crops that can be successfully grown on Saskatchewan farmland. Under the scenario of a phase-out of all three ingredients, producers would be compelled to adopt alternative pest control mechanisms, as they are available, to mitigate large scale production losses in principal field crops, such as canola.

The PMRA's existing evaluation process does not allow for an independent assessment of the health and environmental safety consequences of alternative products, nor does the evaluation process include the estimated economic costs associated with a particular regulatory course of action. Other government agencies commonly pursue regulatory change through the use of impact statements, which include full and transparent cost/benefit analyses. Given the potential for significant economic, environmental and health impacts to be associated with this review, we request the Agency develop a similar process to examine the full range of potential impacts of these review decisions, including risks to applicator health and safety.

Risk Mitigation Strategies

The PMRA's decision on imidacloprid was driven, in large part, by exceedances detected in water monitoring studies at a small number of sites in Ontario and Quebec. Overall, the body of water monitoring data are not indicative of a concern that warrants drastic regulatory action Canada-wide.

Rather, these data should be used as a starting point for a dialogue with stakeholders in order to identify potential risk mitigation actions and/or initiate further studies to help refine the risk assessment.

The current PMRA evaluation process does not consider best management practices as a risk mitigation mechanism, despite the fact that we understand this was a major factor in reducing risk to bees and leading to the PMRA and the U.S Environmental Protection Agency ultimately ruling that imidacloprid poses no threat to pollinators. We also note that studies submitted to the PMRA show varying levels of chemical presence in difference regions of Canada. These differences may be accounted for by regional environmental variations and/or different applications of the chemicals under different production systems. These questions need to be examined in more detail to identify opportunities where it is possible to develop risk mitigation strategies that may allow for continued use of the products while minimizing health and environmental risks.

Conclusion

The PMRA evaluation decisions on these products represented a call to action for agricultural stakeholders and the Government of Canada to do a better job of monitoring water quality in Canadian acquifiers, streams, lakes and other water bodies. Now that work is underway to generate improved water quality data, we ask the PMRA to align its timelines to ensure the reviews are informed by the most up to date and complete data.

The PMRA decisions affecting the use of neonictinoid seed treatments will result in economic and environmental consequences for Prairie grain production. Without access to the effective pest control options provided by these seed treatments, producers will be compelled to adopt alternative pest control options to maintain production and keep agriculture competitive in the Prairie region. We believe that Canadians would expect that the PMRA to consider these consequences as part of the evaluation processes. A full regulatory impact statement would ensure PMRA decision-making is informed by a full and transparent assessment of economic and environmental consequences.