

Comments for Health Canada – Public Consultation

Documents:

PRVD2017-23: Proposed Re-evaluation Decision on Clothianidin and its Associated End-use Products: Pollinator Re-evaluation, and

PRVD2017-24: Proposed re-evaluation Decision on Thiamethoxam and its Associated End-use Products: Pollinator Re-evaluation.

From the Ottawa Horticultural Society

P.O Box 8921, Ottawa, ON K1G 3J2

Thank you for the opportunity to comment on Health Canada's proposed re-evaluation decisions for the neonicotinoids, clothianidin and thiamethoxam, based on the risk assessments.

The Ottawa Horticultural Society (OHS) is a society of 300 members from all parts of the Ottawa region who not only are gardeners, but enjoy sharing our enthusiasm and knowledge for gardening. The OHS has been in continual existence since 1892 making it one of the oldest horticultural societies in Ontario. Our mission is to cultivate an interest in plants and gardening and, as such, we are very interested in the responsible use of pesticides. As a horticultural society, we are particularly concerned about the use of thiamethoxam and other neonicotinoid pesticides for plants used in ornamental and home vegetable gardening and landscaping. Our membership is increasingly attentive to the role gardens and landscaped grounds play in supporting diverse pollinator populations, and we would like to see that there is no danger of neonicotinoid-treated garden/landscaping plants being marketed as “pollinator-friendly” choices.

Health Canada is proposing the following changes to the way clothianidin can be used:

- Phase-out of foliar application to orchard trees and strawberries

- Phase-out of foliar application to municipal, industrial and residential turf sites

- Reduction of pre-bloom application from 2 to 1 for cucurbit (cucumbers, squash, etc.) vegetables

- Additional protective label instruction for cereal crop uses.

Health Canada is proposing the following changes to the way thiamethoxam can be used:

- Phase-out of foliar and soil applications to ornamental crops that will result in pollinator exposure

- Phase-out of soil application to berry crops, cucurbit crops and fruiting vegetables

- Phase-out of foliar application to orchard trees

- Foliar application to legumes, outdoor fruiting vegetables, and berry crops would no longer be permitted before or during bloom.

We fully support Health Canada's efforts to lessen the risks posed to pollinators through the use of neonicotinoids. While these proposals are good first steps, there are other steps that should be considered.

We notice that most of the research cited is European and mostly about honey bees. There are approximately 4,500 species of native bees (non-honey bees) in North America. It is estimated that of the insect-pollinated plants in North America 38% are pollinated by honey bees, 39% by native bees and 23% by other pollinators (wasps,

moths, butterflies, beetles). We urge Health Canada to continue to research the literature including that which pertains to North American native bee species and other pollinators.

We encourage Health Canada to eliminate the use of treated seed as a prophylactic. Not only would this reduce the risk of neonicotinoid contamination, but would delay the development of neonicotinoid-resistant pests such as is occurring with the Colorado Potato Beetle and imidacloprid and thiomethoxam.

Another concern is non-target impacts. For example, as Health Canada has noted, grapes are not usually frequented by bees. These are for the most part, self-pollinated. However, cover crops are sown as part of vineyard management. The legumes, grasses and native plants which are often used are attractive to pollinators. Neonicotinoid treatment should not occur when these cover crops are in bloom.

It is also noted that there is no time specified for phase-out in these proposals. We strongly urge Health Canada to accomplish phase-out in the next two years, not by 2023.

In conclusion, while fully supportive of Health Canada's proposals, we would like to see: research continue especially on the effects of neonicotinoids on all species of pollinators; continued work on seed treated dust-reducing methods and seed treatment coatings; elimination of treated seed as a prophylactic; management practices which reduce impact on non-targeted species, and accelerated implementation of these proposals.

Again, thank you for the opportunity to comment.

The Executive and Board of Directors of the Ottawa Horticultural Society.

Ottawa, Ontario

February 12, 2018.