

Minister of Health



Ministre de la Santé

Ottawa, Canada K1A 0K9

Dear Sir/Madam:

Thank you for your correspondence concerning the proposed ban of neonicotinoid pesticides.

Health Canada's Pest Management Regulatory Agency (PMRA) is responsible for regulating pesticides, with the priority of protecting the health and safety of Canadians and their environment. Before a pesticide product is approved for use in Canada, it must undergo a thorough science-based risk assessment and meet strict health and environmental standards. In addition, every 15 years, a re-evaluation of registered products is conducted to ensure they continue to meet these strict standards.

Re-evaluations update risk assessment methods, take into account newly available data and consider regulatory reviews from foreign jurisdictions. These assessments include the examination of a variety of environmental toxicity studies, including toxicity to birds, bees and aquatic life.

The human health risk assessment includes the examination of a variety of health hazards, including potential effects on the developing nervous system, the endocrine system, and reproduction. Also included in the PMRA's human health risk assessment is a consideration for potentially sensitive sub-populations, such as children. If the use of a product poses risks of concern to human health or the environment, new products are not registered for use in Canada and products under re-evaluation may have their registrations cancelled.

The PMRA has worked with stakeholders to develop measures to reduce risk to pollinators from exposure to dust generated during planting of insecticide-treated seed. These measures were developed in collaboration with the provinces, pesticide industry, international regulatory authorities, growers, beekeepers, and equipment manufacturers. The mandatory use of a new dust-reducing seed flow lubricant, adherence to identified safer seed planting practices and enhanced warning statements on pesticide and seed package labels were implemented in 2014. Since these measures have been put in place, the number of incidents has declined substantially.

Health Canada is currently conducting a pollinator focused re-evaluation of three neonicotinoid insecticides (imidacloprid, clothianidin, and thiamethoxam). This work is being carried out in collaboration with the United States Environmental Protection Agency and the California Department of Pesticide Regulation. Following a

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comprehensive scientific assessment, in which both chronic and acute risks to pollinators were assessed, the proposed re-evaluation decisions for clothianidin and thiamethoxam were published in December 2017 and the proposed decision for imidacloprid was published on May 31, 2018. These proposals identify uses for phase out and put further restriction on other uses in order to protect bees and other pollinators. The public consultation has now closed for all three neonicotinoids. Comments received will be considered in the final decision.

In addition to the pollinator focused re-evaluations, a full re-evaluation (excluding pollinators) of the neonicotinoid imidacloprid has been completed, as well as reviews of risks to aquatic organisms for clothianidin and thiamethoxam. Although the consultation period for imidacloprid has closed, comments on the reviews of clothianidin and thiamethoxam will be accepted until November 13, 2018. Current consultations can be accessed through <https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/consultations.html>. Comments and information received during public consultations will be considered in our final decisions.

The environmental assessments showed that in aquatic environments in Canada, these neonicotinoids are being measured at levels that are harmful to aquatic insects. These insects are an important part of the ecosystem, including as a food source for fish, birds and other animals.

As a result, for the protection of the environment, Health Canada is proposing to phase out all agricultural uses and a majority of other outdoor uses of these neonicotinoids over three to five years. Product phase-outs consider the time needed to remove or dispose of existing products from the marketplace, the nature of the restrictions being implemented, the impact on farmers and others in the industry, and availability of alternatives. For most agricultural uses of these three neonicotinoids, Health Canada is proposing a three-year phase-out following the publication of the final re-evaluation decision. This will allow for the orderly removal of the product from the marketplace and alternatives to be identified. In some cases, where there are no alternative pest control products available, a longer phase-out period of five years is being proposed to allow for the development of new alternatives. This practice is aligned with that of the United States Environmental Protection Agency. During the consultation period, many comments were received regarding the length of the proposed phase-out period. Comments received during the consultation period will be considered prior to making a final regulatory decision.

Health Canada will continue to work with national and international colleagues to closely monitor scientific information and other developments related to the potential

impacts of pesticides, not only in Canada and the United States, but also in Europe. On April 27, 2018, the European Parliament voted to ban all outdoor agricultural uses of neonicotinoids to protect pollinators. The PMRA will review the science and rationale behind this decision and incorporate any new information from this assessment into its assessments. Additional regulatory measures will be taken if warranted and supported by the available science.

Again, thank you for writing.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Ginette Petitpas Taylor". The signature is fluid and cursive, with a large initial "G" and a stylized "T" at the end.

The Honourable Ginette Petitpas Taylor, P.C., M.P.