



Randy R. Hope



Municipality of Chatham-Kent

315 King Street West
P.O. Box 640
Chatham, Ontario
N7M 5K8

Telephone: 519.436.3219

Fax No.: 519.436.3236

Email: RandyHope@chatham-kent.ca

Briefing Notes

Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario

Background

Neonicotinoids (neonics for short) are a class of neuro-active insecticides. Neonics are systemic pesticides. Unlike contact pesticides which remain on the surface of the treated foliage, systemics are taken up by the plant and transported to all the tissues (leaves, flowers, roots and stems, as well as pollen and nectar). Products containing neonics can be applied at the root (as seed coating or soil drench) or sprayed onto crop foliage.

In Ontario, neonics have been used as a seed treatment for corn and soybean producers starting in 2004. This class of chemistry was readily adopted by farmers as it was viewed as far safer to humans and the environment than products used previously. The use of neonics allowed producers to move away from more toxic soil insecticides and the use of full-field foliar spraying. The result has been more uniform plant stands which results in higher yields, more consistent quality and a reduced footprint on the environment. Neonics are currently used on the majority of Ontario's corn, soybean as well as many other cereal, oilseed, fruit and vegetable crops.

At the same time these seed treatments were being adopted, many farmers started using new planter technologies that utilized an air stream, versus mechanical means, to position seed from the seed tank to the metering system. Specific pneumatic planter technologies resulted in the exhaust of air to the environment. When using neonicotinoid seed treatments with these planters it could result in the emission of dust containing the neonicotinoid seed treatment. This created an acute exposure risk for bees under the right conditions, which has become the central issue in the neonicotinoid use debate.

Farmers across Ontario have recognized this risk and adopted risk reduction strategies that led to a 70% decline in the number of calls made to Health Canada on this issue in 2014-with 72% of the calls made from three beekeepers.

In November 2014, the Ontario Liberal government announced a proposal for "Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario". This proposal includes:

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- Working towards an aspirational goal of 80% reduction in the number of acres planted with neonicotinoid-treated corn and soybean seed by 2017
- Reducing the over-winter honeybee mortality rate to 15% by 2020
- Establishing a comprehensive Pollinator Health Action Plan

There are basically two sides on this issue, (which involves many different sectors and players), but it is important to realize all groups want the same thing; which is a proposal to benefit pollinator health and environmental stewardship.

Bee health is a complex topic. Although Statistics Canada points out that bee populations and honey production is increasing in Ontario, beekeepers have several concerns related to the health of their livestock. This includes varroa mites, other damaging insects and diseases, loss of habitat and exposure to pesticides and research into other areas of bee health. **Interviews with not only beekeepers from across Ontario but also with users of pollinating services in Chatham Kent highlight that many beekeepers and their customers are not experiencing the issues with neonicotinoid seed treatments as prioritized by the province.** In fact together with National organizations including the Canadian Honey Council, these beekeepers and their customers would like to see the risk based evaluation approach used in making decisions concerning pest control products. In fact beekeepers involved in crops including hybrid seed canola production view neonics as a vital Integrated Pest Management Tool (IPM) to their production system, canola being a preferred crop for pollinators.

The Provincial government has chosen to focus their proposal around overwintering losses while organizations including the Canadian Honey Council has stated that this is not the best measure of bee health.

Impact

The impact of this proposal should be analyzed from an environmental and economic perspective.

Environmental

- Will force farmers to move back to full field foliar sprays to control insects from grubs to leafhoppers, bean leaf beetles and aphids. This means moving to treating all 43,560 square feet in an acre to protecting the seed compared to treating 25 square feet in an acre with a seed treatment. By applying foliar sprays, beneficial insects such as the lady bug which controls soybean aphids are killed.
- Will force farmers to move away from the use of conservation tillage practices such as no-till or minimum tillage and the use of cover crops – practices that were aimed at reducing the carbon footprint of agriculture on the environment
- Will reduce final plant stands which will lead to increased use of in-crop herbicides.

- Lower yields will force farmers to grow crops on marginal land which will in fact further reduce pollinator habitat.

Economic

- The Conference Board of Canada released a report in 2014 that stated the elimination of neonicotinoid seed treatments in corn and soybeans would cost Ontario farmers \$630 million dollars per year. This is related to increased production costs and the impact increased insect activity would have in lowering crop yields. This figure represents the average profit margin for Ontario cash crop operations and does not account for additional costs at the Provincial and farm level to implement this proposal.
- The proposal will lead to additional license requirements and costs for farm based seed dealers (farmers who sell to other farmers in their area which accounts for 60% of corn and soybean sales in the province today). This will result in the consolidation or elimination of these farm based businesses across the province.
- The creation of an uncertain regulatory environment within the province would limit the investment into new agricultural technologies in this province.
- This proposal threatens the existence of the seed corn industry in Canada which is primarily based in Chatham-Kent given our climate. The seed corn industry today accounts for close to \$100 million in economic activity including over 500 full time and 2500 seasonal jobs – largely in Chatham-Kent.
- Neonicotinoids are registered in more than 120 countries, including Canada and the United States. The European Union member states voted to place a moratorium for the use of three neonicotinoids for two years beginning in December, 2013. In the fall of 2014 producers planted their first winter oilseed rape crop without neonics. By all accounts it is an unmitigated disaster. A report from HGCA states that 41% of all crops were affected by the beetles. This led to a significant increase in the use of pyrethroids. Plant stand losses in many cases exceeded 25% and most growers were forced to spray 2 to 3 times to establish their crop vs zero foliar sprays in previous years.
- The Province of Ontario is continuing discussions with stakeholders on the proposal to reduce the use of neonicotinoid-treated corn and soybean seed. If approved, new rules on the use of neonicotinoids will be in place by July 1, 2015, in time for the 2016 agricultural planting season.

This briefing is being brought forward by the Municipality of Chatham-Kent because many of Chatham-Kent based farmers and seed growers are concerned about the economic and environmental impact of proposed changes (outlined above) brought forward by the Ontario Liberal government.

The proposal brought forward by the Provincial government is in direct contrast to the Premier's directive of creating jobs and economic growth in agriculture.

Recommendations

That the Province conduct a cost benefit analysis and that the Province rely on a risk based technology evaluation process not the precautionary principal before proceeding on the regulations outlined in the Pollinator Health Discussion paper.

That the Province collaborate with farm and industry organizations towards a proposal that benefits pollinator health without crippling agriculture in Ontario.

Prepared by:

This brief was prepared by Steve Denys and Wayne Black with information that is generally agreed to from the following groups: Grain Farmers of Ontario, Ontario Federation of Agriculture, Kent Federation of Agriculture, Devolder Farms, Canadian Seed Trade Association, Ontario Seed Corn Growers Association, Pride Seeds and many local farmers and seed growers.

For further information, please contact:

Steve Denys

Telephone: 519-358-3370

Email: sdenys@prideseed.com

Wayne Black

Telephone: 519-809-0204

Email: wblack@devolderfarms.com

Mayor Randy Hope

Email: randyhope@chatham-kent.ca

Don Shropshire

Chief Administrative Officer

Municipality of Chatham-Kent

315 King Street West, PO Box 640

Chatham, Ontario N7M 5K8

Telephone 519-436-3219

Email: don.shropshire@chatham-kent.ca