

TO: Health Canada and Health Minister Jane Philpott Hon.Jane.Philpott@Canada.ca
CC Elizabeth May, Leader of the Green Party Elizabeth.May@parl.gc.ca
CC Erin Weir, MP for regina Lewvan Erin.Weir@parl.gc.ca

Ban the bee-killing neonic pesticide imidacloprid!

On behalf of the educational group *Saskatchewan Network for Alternatives to Pesticides* (www.snapinfo.ca), I enjoin you to ban imidacloprid now.

The only good point of the bee die-off and possible link to neonicotinoids is that it finally freed up moneys for a flurry on independent research on effects of neonicotinoids in general, and imidacloprid in particular. Scientific evidence of harm across the ecosystem from imidacloprid and other neonicotinoids is now overwhelming and can no longer be denied, except by the pesticide industry who wants to protect its bottom line at any cost. (7,8,9)

A recent risk assessment report by Health Canada found that continued use of imidacloprid is “not sustainable” and proposed phasing out this neonicotinoid in 3-5 years. This 3-5 year timeline is in the interest of the pesticide industry - not science. If there is finally enough evidence of harm now to satisfy the PMRA, what is the sense in keeping this conditionally approved, long-lasting insecticide that accumulates in the environment (like DDT) on the market for 3-5 more years? In addition, as the PMRA only regulates sales and not use, and companies traditionally have huge sales of a product before it is banned, it would mean use of imidacloprid for likely another 10 more years of accumulation and causing harm, affecting not only bees but birds (3), amphibians, other insects (4) aquatic organisms, biodiversity and ecosystem services.(1,2,5) The number of 10 years is supported by studies of pesticide accumulation in glaciers. Scientists have found that it takes ten years after a product is banned before deposition in glaciers decreases annually. (6) In Addition, the US EPA as well as other agencies have found neonicotinoid seed treatments of little or no benefit (13) and widespread water contamination in the US (16) (likely not studied in Canada yet)

I have written to the PMRA several times about neonicotinoids starting many years ago, and their response, when there was one, has been that there was no evidence of harm, even after France and Germany suspended use of several neonicotinoids because of evidence of harm to bees. For the last many years, the PMRA has not even bothered answering any of my questions. In addition, the PMRA has been hard at work licensing imidacloprid for more and more crops, and licensing more neonicotinoid insecticides for use in Canada. These products were also licensed conditionally, which means they did not go through all the mandated regulatory tests, which may not be sufficient or adequate to assess environmental risks in any case. To my knowledge, the battery of regulatory tests required by the PMRA has not been updated since 1984, 32 years ago, in spite of strides in detection methods and international consensus on low levels effects and endocrine disruption.(10, 11)

The current risk-benefit assessment mechanism also seems obscure. In the case of the review of 2,4-D for lawn use in 2005 (14), it seemed to amount to 'we find it useful, therefore it trumps any health effects', so we will mitigate by reducing concentration used, frequency of use, and increase buffer. Several well done important studies were rejected in the assessment, I suspect because at least 2 of the 'independent experts' chosen to review the evidence are in the pay of industry, whose position is that regulatory science is the only valid science and sufficient. The pesticide industry also regularly attack any epidemiological or environmental study that could affect their bottom line and that they did not pay for themselves. They also attack the scientists and institutions responsible for them. (7,8,9)

It would be criminal to allow the pesticide industry once more to dominate the review committee and process, and get their whole denial machine in gear to spread their disinformation curtain and keep a damageable product on the market for several more years. (9, 12,15) The widespread contamination of soil and water as well as well-documented effects on all kinds of animals and the ecosystem indicate we are well-past mitigation measures. Imidacloprid must be banned now.

Paule Hjertaas,
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References

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3. [The Impact of the Nation's Most Widely Used Insecticides on Birds](#). Neonicotinoid Insecticides and Birds. by Dr. Pierre Mineau and Cynthia Palmer. American Bird Conservancy, March 2013
4. [More Evidence Shows Neonics Harm Butterflies](#) (*Beyond Pesticides*, August 19, 2016)
5. <http://www.snapinfo.ca/issues/bee-die-off>, <http://www.snapinfo.ca/info/fact-sheets> /neonicotinoids, and <http://www.snapinfo.ca/issues/water> general page, and Saskatchewan subpage for Dr Morrissey's work on accumulation in Saskatchewan sediments.
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14. <http://www.snapinfo.ca/issues/24-d>
15. [Report Details Industry Efforts to Derail Pollinator Protections](#)
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Additional Information

<http://beyondpesticides.org/dailynewsblog/category/chemicals/imidacloprid/> articles related to imidacloprid