



TEAMALBERTA ADVANCING POLICY ON BEHALF OF ALBERTA'S CROP SECTOR

July 31, 2017

The Honourable Oneil Carlier
Minister of Agriculture and Forestry
229 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Re: PMRA re-evaluation of neonicotinoids

Dear Minister Carlier,

On behalf of Team Alberta, we would like to encourage you to raise the federal government's handling of the re-evaluation of crop protection products with your colleagues at the upcoming Federal Provincial Territorial Ministers of Agriculture meeting in St. John's on July 19-21. The Pest Management Regulatory Agency (PMRA) has announced its intent to phase out the crop protection product imidacloprid over the next three years for all agricultural uses; in addition, they have placed two other products in the neonicotinoid family, thiamethoxam and clothianidin, under a special review. If the PMRA takes the same course of action on these products, the agricultural community will stand to lose these important crop protection tools and the consequences will be disastrous for farmers and the environment.

The PMRA has recently issued a series of proposed re-evaluation decisions, impacting the agricultural sector that have lacked the transparency and predictability that we have come to expect and need from the PMRA. For example, in advance of announcing the plan to phase out imidacloprid, the PMRA had no prior engagement with either the farm community or the registrant of imidacloprid. Dialogue with the industry should be initiated from the onset of a PMRA potential concern being flagged in order to ensure decisions are informed by all available data. Our farmer members, and industry as a whole, are concerned the PMRA is sacrificing scientific risk-based decisions making to meet arbitrary and non-transparent deadlines.

Team Alberta is a collaborative initiative led by the province's four crop commissions:



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Minister, we need support from you and your federal and provincial counterparts on this important issue. Specifically, we are requesting your support in advocating for the following points below, on behalf of farmers in the Alberta cropping sector.

Firstly, flexibility in the PMRA's timelines to allow for more fulsome study and the necessary time to ensure that crucial data can be incorporated in to the risk assessment and final re-evaluation decision.

Agriculture and Agri-Food Canada (AAFC) has initiated a multi-stakeholder forum to study alternatives and mitigation practices and conduct targeted water monitoring studies for 2017. These efforts will generate essential data to inform and refine PMRA's risk assessment; which ought to have been conducted prior to PMRA announcing the phase-out of the product.

Secondly, we are asking for improved process with respect to re-evaluations going forward which include fair scientific discussion and openness to input from external expertise.

Lastly, we believe that Canada needs to consider establishing a national water-monitoring program that would generate scientifically robust data Canada-wide that could be used to inform future pesticide re-evaluations including for thiamethoxam and clothianidin. This will need substantial provincial financial support to execute effectively on behalf of all Canadian farmers.

Minister, as you know these neonicotinoid products are some of the most important and safest tools available to farmers today for insect pest control. Human health and safety are of the utmost concern to our sector. Neonicotinoids as a seed coating have numerous tangible benefits which include: a significant reduction in the need for multiple foliar spray applications of insecticide in field crops and a reduction in tillage which result in the protection of non-target organisms and decreased use of fossil fuels. Without access to neonicotinoids, farmers may stop growing certain crop types as there are instances for which there is no registered product available to address current insect threats. For instance, in the case of imidacloprid, the PMRA has proposed a cancellation of all food and feed uses in Canada of its' potential alternative, Lambda-cyhalothrin.

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For Albertan farmers to remain competitive in the world market, we need access to the most effective tools to manage weed, insect, and disease problems that can threaten the quality, quantity and value of our crops. Farmers across the country are increasingly concerned that re-evaluation decisions, like this one, are being made without transparency or sound scientific data, and are creating an atmosphere of unpredictability that do little for environmental protection while our farmers will pay the price for the loss of these innovations by damaging competitiveness.

Canada has a strong reputation for a science-based regulatory system administered by the PMRA but we are concerned that confidence in the system - both in Canada and with our international customers - will begin to erode if the review process for these three products becomes the new standard.

On behalf of Alberta Barley, Alberta Canola, Alberta Pulse Growers and the Alberta Wheat Commission, we thank you for your attention to this important matter. Please contact Shannon Sereda, Market Development and Policy Manager with Alberta Barley, at 403-219-6263 or by email at ssereda@albertabarley.com, should you require further information.

Sincerely,

Jason Lenz
Chairman, Alberta Barley

D'arcy Hilgartner
Chairman, Alberta Pulse Growers

Greg Sears
Chairman, Alberta Canola Producers
Commission

Kevin Auch
Chairman, Alberta Wheat Commission

Cc: Members of Executive Council
Bev Yee, Deputy Minister of Agriculture and Forestry

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