



TEAMALBERTA

ADVANCING ALBERTA'S CROP SECTOR TO 2025 AND BEYOND

August 29, 2019

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
2720 Riverside DR
Ottawa, ON K1A 0K9
Email: hc.pmra.publications-arla.sc@canada.ca

Re: Consultation on chlorpyrifos and its associated end-use products: Updated environmental risk assessment, proposed re-evaluation decision PRVD2019-05

To Whom It May Concern:

On behalf of Alberta's grain farmers, Team Alberta is concerned about the Pest Management Regulatory Agency's (PMRA's) proposed decision to cancel all outdoor agricultural uses of chlorpyrifos; the active ingredient in Lorsban. Team Alberta implores the PMRA to address the significant re-evaluation process concerns that have been presented by farmers and industry alike, through this and past consultations processes, prior to making a final re-evaluation decision on chlorpyrifos or any other active currently under review.

Team Alberta is a collaborative initiative led by four of Alberta's major crop commissions to improve the long-term success of Alberta's farmers. Comprised of Alberta Barley, Alberta Canola, Alberta Pulse Growers, and the Alberta Wheat Commission, Team Alberta represents nearly 20 million acres of grains, oilseeds and pulses grown over 20,000 farms across Alberta. Together, we bring a unified voice to timely issues that have significant impact on the continued growth and competitiveness of Alberta's crop sector.

For farmers to remain competitive in the world market, we need access to innovative and effective tools to manage weed, insect, and disease problems when they threaten the quality, quantity and value of our crops. Cancelling Lorsban would restrict the grower's ability to deal with insect outbreaks, potentially increasing the pressure for resistance rendering farmers defenseless and/or reducing Canada's exports in years when outbreaks occur. Farmers depend upon a rigorous regulatory system that upholds the reputation of our high-quality and safe grains, oilseeds and pulses, making decisions on the best available scientific data.

Farmers value increased biodiversity of beneficial insects and pollinators that flourish within the crop canopies. We recognize that non-selective pesticides can impact the unique ecosystems within our fields. The Field Heroes initiative is an example of adult education and extension regarding the role of parasitoid and predator insects in keeping pest populations in check. In dire circumstances, when pests exceed economic thresholds, we are faced with prudently using the tools at hand in order to protect our

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livelihoods. This is the reason use patterns for Lorsban varies widely from year-to-year and across growing regions.

In wheat and barley Lorsban is the only option for controlling both eggs and adults in wheat midge as any alternatives only control adult populations, which isn't sufficient for eradicating the pest to prevent continued outbreaks. For brown wheat mite, which effects most cereals including barley, there are no other efficacious options to control this pest. Access to the active chlorpyrifos is imperative in a severe outbreak situation. Lorsban is also the most effective control for cutworms, both pale western and glassy cutworms in both wheat and barley.

In canola, Lorsban is used when necessary to control outbreaks of bertha army worms, cutworms, diamond back moth larvae, grasshoppers, alfalfa looper and lygus bugs. In pulse crops chlorpyrifos is a consistent and effective pesticide for the control of grasshoppers in lentil crops, especially when outbreaks occur. Lentils have been shown to be more susceptible to grasshopper feeding than other crops. The cancellation of chlorpyrifos leaves only two options for pulse growers; one of which is also under review by the PMRA.

The decisions made by the PMRA have a significant and direct impact on farmers. Cost benefit analysis which considers alternative availability; the environmental impact of those alternatives; and economic and competitiveness factors is imperative. Where there is recognition that the re-evaluation process is not working, we appeal to the PMRA to reserve making further decisions until re-evaluation concerns are addressed.

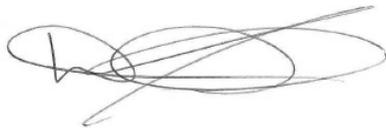
Team Alberta supports the chlorpyrifos submissions provided by our national organizations: the Canadian Canola Growers Association, Canola Council of Canada, Grain Growers of Canada, Pulse Canada, and Cereals Canada. We endorse the detailed information that these groups have provided as solutions and recommendations to maintain the reputation and trust of Canada's regulatory system related to crop protection products. We ask that you strongly consider our concerns in the PMRA's final decision.

Thank you for your consideration.

Sincerely,



Dave Bishop,
Chair, Alberta Barley



Don Shepert
Chair, Alberta Pulse Growers



John Guelly
Chair, Alberta Canola



Gary Stanford
Chair, Alberta Wheat Commission

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Cc: Hon. Ginette Petitpas Taylor, Minister of Health
Hon. Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
Hon. Catherine McKenna, Minister of Environment and Climate Change
Hon. Devin Dreeschen, Minister of Agriculture and Forestry, Government of Alberta
Hon. Jason Nixon, Minister of Environment and Parks, Government of Alberta

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