Nicoll, Sara ENV:EX

From: Dave Carey <dcarey@cdnseed.org>
Sent: Tuesday, March 10, 2015 12:56 PM
To: Minister, AGRI AGRI:EX; Minister, ENV ENV:EX
Cc: 'Dave Carey'
Subject: Follow Up Value Chain Letter
Attachments: Value Chain Letter. Minister Pimm and Polak. BC.pdf; Minister Letnick and Minister Polak. BC.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Info/File

Good afternoon,

Attached please find a letter on behalf of a Value Chain Coalition of Agricultural Industry Associations.

This letter is in follow up to a letter that was sent in August, 2013, which is also attached.

Please don't hesitate to contact me directly if you have any questions or comments.

Regards,

Dave Carey

CSTA ACCS

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March 10, 2015

Honourable Norm Letnick
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Honourable Mary Polak
Minister of Environment, British Colombia
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Dear Minister Letnick and Minister Polak,

In the fall of 2012 an industry led value chain coalition came together in the spirit of stewardship and collaboration to begin a dialogue on pollinator health and seed applied insecticides. This diverse group of stakeholders developed a series of initiatives that could be collectively implemented to mitigate risk to pollinators, including from dust generated during the planting of corn and soybeans. In August 2013 this coalition sent a letter to the federal and provincial ministers of agriculture and environment that outlined our commitments and reaffirmed our continued desire to work with policy makers at both the federal and provincial levels. A copy of this letter is enclosed.

Over the past 18 months this coalition and the broader agriculture industry have achieved strong, measurable success in mitigating risk to pollinators while ensuring that Canadian growers have access to the technologies that they need to produce food in a safe, sustainable and environmentally friendly way.

In the August 2013 letter this coalition made five specific commitments to improve pollinator health. The five commitments made were:

1. Promotion of best management practices for the planting of treated seed
2. Additional labeling for treated seed
3. Improved technology
4. Lifecycle stewardship
5. Giving farmers choice

As a coalition we are pleased to report that we have made significant progress on our commitments:

Promotion of best management practices (BMPs): BMPs for planting treated seed were developed by industry stakeholders and brought forward by the Pest Management Regulatory Agency (PMRA) of Health Canada in 2013. In a very short period of time these BMPs were widely communicated and adopted by seed companies, retailers and growers.

Additional labeling: New labeling for corn and soybeans that have been treated with neonicotinoids was developed by the Pest Management Regulatory Agency (PMRA) of Health Canada and members of this coalition. Although the additional labeling was not scheduled to be implemented until 2015 our industry partners were able to implement the new PMRA labeling to neonicotinoid treated corn and soybeans for the

2014 season, implementing the requirements a full year ahead of schedule as a direct reflection of our clear commitment to pollinator health.

Improved technology: Substantial resources went into distributing, educating, promoting and training for the mandatory use of a new seed flow fluency agent when planting neonicotinoid treated corn and soybeans. This new fluency agent significantly reduces the dust generated during planting and was used on the vast majority of acres planted with treated seeds (based on the volume of the product distributed). Having a completely new product so widely adopted in just a matter of months would not have been possible without the sincere commitment of the agriculture sector.

Lifecycle stewardship: New standards for seed treatment facilities are being implemented and additional standards for the handling, storage; use and disposal of treated seed are being developed, and will be enforced by the industry. With support from industry, CleanFARMS, a not-for-profit industry stewardship organization, is continuing to run an empty seed and pesticide bag collection pilot project to ensure that products are disposed of in an environmentally responsible manner. CleanFARMS will be expanding this program to over 200 locations in 2015. CleanFARMS is an industry-led stewardship organization that was awarded the 2012 Minister's Award for Environmental Excellence by the Ontario Ministry of the Environment and Climate Change.

Giving farmers choice: Seed companies and seed retailers will continue to ensure that farmers have access to a range of products including untreated seed, fungicide-only treated seed, and seed treated with fungicides and insecticides. More options were offered in 2014 than ever before. These options were also collected and published by the Ontario Ministry of Agriculture, Food and Rural Affairs. The choice of seed protection options will continue to be customer driven based on the individual needs identified on the land they farm.

Today

This coalition has gone above and beyond the initial commitments it made and will continue to work together to reduce the dust generated during planting to ensure the safe planting of insecticide treated seed. Our coalition, which includes, grower groups, developers, academics, beekeepers and regulators, among others, is actively educating and training those who choose to use insecticide treated seed to ensure that it is being used in a safe and responsible manner.

The stewardship initiatives undertaken by the value chain are paying off. On November 25, 2014 PMRA released preliminary results of its bee health monitoring project which concluded that to date "*Health Canada's PMRA does not have sufficient information to draw conclusions regarding a link between these colony effects and potential neonicotinoid exposure*." PMRA's scientific work found that the number of bee death incidents reported during planting in Canada was down by 70 per cent in 2014 compared to 2013.

We are united as an agriculture industry and the lines of communication and dialogue are open like never before.

Recognizing that bee health is complex and multi-factorial, several members of this coalition requested the creation of a multi-stakeholder National Bee Health Roundtable. The mandate of the Bee Health Roundtable is to share information, educate, and work collaboratively on strategies to realize the goal of the Roundtable. This is facilitated by multi-stakeholder representatives from across the apiculture value chain, including beekeepers, professional apiculturists, agricultural producers, seed companies, government regulators, the crop protection industry, and agronomists.

As an industry we recognize that in order to meet future global food demand, farmers will have to increase their food production while being challenged by competition for land and water and by climate change. To meet these demands, production and yield must increase on a per acre basis. As such, farming practices have changed. Farmers are increasingly planting seed earlier in the growing season to allow for a longer growing period to help maximize yields. This is especially true for corn and soybeans.

However, early season planting in cold and wet soils puts the seed and seedling at a greater risk. Seed treatments help offset some of this risk because they offer protection when the plant is most vulnerable; as a seed and seedling. Currently neonicotinoid seed treatments are the only way to protect the seed from pests. There is no rescue treatment available for below-ground pest control after planting.

Seed treatments remain the least environmentally intrusive measure for controlling insects that are an annual concern in many crop types, including corn, soybeans and canola, and as a result are an important tool for many producers. Safe and targeted use of neonicotinoid seed treatment introduces an efficient use of pesticides and reduces the amount of chemical used on large areas of farmland by reducing or eliminating the number of foliar sprays and allowing for a precision agricultural operation.

Another benefit of this technology is that farmers do not have to till or over-till their land before they plant their crop, protecting fragile soil, reducing erosion and soil compaction while protecting soil nutrients and allowing the use of seeded cover crops. This also means less fuel is used on farm, reducing the carbon footprint.

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Without access to technologies such as neonicotinoid seed treatments, production would drop and costs would rise sharply for both farmers and consumers. The economic costs would be heavy and ironically, the environmental costs would also be high.

As an industry we encourage both federal and provincial policy makers to support peer reviewed science as the foundation for regulatory decisions. Sound scientific principles are measurable and reproducible. Regulatory assessments and approval process based on risk ensure that all products are assessed consistently, giving confidence to consumers and to the developers of innovative solutions for agriculture.

The Canadian agriculture industry understands that pollinators and crop protection products are complementary and integral components of a sustainable agricultural system. We will continue to work with regulators and the entire value chain to ensure the safe and responsible use of all seed borne technologies, including neonicotinoid seed treatments.

Respectfully signed:

Canadian Seed Trade Association
Canadian Canola Growers Association
Canadian Association of Agri-Retailers
Grain Growers of Canada
Grain Farmers of Ontario
Association of Equipment Manufacturers
Canadian Horticultural Council
CropLife Canada
Quebec Seed Trade Association
Canola Council of Canada

August 12, 2013

Honourable Pat Pimm
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Honourable Mary Polak
Minister of Environment, British Colombia
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Dear Minister Pimm and Minister Polak,

The Canadian Agriculture and Agri-food system makes a significant contribution to the Canadian economy, directly providing one in eight jobs, employing 2.1 million people and accounting for 8.0% of total GDP.

In order to produce an abundant supply of high quality products for food, feed and industrial uses farmers need to have access to the latest technologies and production tools. As participants in the value chain, we are committed to providing and using this technology in a sustainable and responsible manner. The undersigned organizations are committed to maintaining the highest possible standards for the development, application and use of all crop production inputs, including seed treatments.

We all have a vested interest in the health and wellbeing of pollinators. They are critical for the production of many crops and for the overall success of the Canadian agriculture industry. As an industry we agree that bees and other non-target organisms should not come in to contact with seed-borne insecticides, such as neonicotinoids and we are committed to mitigating any potential risk to bees from dust generated during planting. As technology developers, seed treaters, seed and seed treatment marketers, and users of the technology, we have a role to play in ensuring that seed-applied insecticides are used in a manner that minimizes the risk of pollinator exposure.

Specifically we commit to:

- continue to work together with regulators and policy makers, to develop and implement measures and practises that will substantially reduce the dust generated from planting insecticide-treated seed;
- inform, educate and train those who choose insecticide-treated seed on when and how to safely use the technology;
- offer untreated seed to those who may decide not to use the technology; and
- engage the beekeeper community to understand the challenges they face as integral components of our agricultural industry.

Seed-Borne Insecticides bring Value to Farmers and to the Environment

By 2050, the world's farmers will need to double their food production while challenged by competition for land and water and by climate change. Seed-applied insecticides, or seed treatments, offer real and tangible benefits to the value chain by increasing productivity, facilitating sustainable farm incomes, and targeting the

product where it is most effective.

Farming practices have changed. In order to extend the growing season and maximize yield, many crops are planted earlier in the year in soils that are often cold and wet. This exposes the seed and seedling to a range of potentially devastating pests including those that carry bacterial and viral diseases that could destroy a harvest. Seed-applied insecticides, like neonicotinoids, help protect the seed and seedling against these pests during the most vulnerable period, giving the seed the chance to grow and flourish into a healthy crop.

Seed-applied insecticides provide a real economic benefit to Canadian farmers. The use of seed-applied insecticides has been proven to significantly increase production, with a positive impact on farm income. For example, trials conducted in Ontario and Quebec from 2002-2007 showed that seed-applied insecticides helped to boost average corn yields by 4.2 to 13.3 bushels per acre, which translates to an increase of $21 to $67 per acre for the grower. This represents between $63 and $201 million for corn growers in Canada in 2012 (based on 3 million acres at $5.05/bu corn). Similar trials in soybeans showed an average yield increase of 2.1 to 6.8 bushels per acre, resulting in an increase of $26 to $108 per acre for the grower. In addition to increased productivity and profitability, evidence also suggests that seed treatments enhance plant health and vigour while improving germination and creating a more uniform plant stand.

Seed treatments are a highly efficient and targeted form of crop protection technology that is more environmentally friendly than the alternative insecticide application methods. Precise amounts of insecticide are applied directly to the seed which is then planted in the ground, minimizing the likelihood that non-targeted organisms, such as bees, are exposed. The alternative to using seed-applied insecticides are broadcast/foliar sprays or in-furrow treatments, which are less targeted and require more chemicals to treat the same amount of farmland. For example, the amount of seed-borne insecticide used is typically less than 10% of that applied in-furrow and less than 1% of that from a broadcast spray treatment. Depending on the crop and pests in the area, seed treatments can reduce the number of foliar sprays by up to 4 applications.

The Value Chain Has a Role

As the developers, applicators, marketers and users of seed treatments and treated seed, we take our stewardship obligations very seriously. We have a responsibility to ensure that the technology is being used in a safe and responsible way. In light of recent events, our industry has taken additional steps to further protect bees from potential risks from unintended exposures to pesticides from treated seeds and is confident that these efforts will have a positive and lasting effect. A recent international meeting of regulators, including Canada's Pest Management Regulatory Agency (PMRA) and industry stakeholders, hosted by the United States Environmental Protection Agency (US EPA), concluded that activities currently underway in our industry would mitigate the risk to bees from planting dust. Some of these efforts include:

1. **Promotion of Best Management Practices:** Best Management Practices (BMPs) for Planting Treated Seed, have been developed, and are being actively promoted along the value chain.
2. **Labeling:** All insecticide treated seed bags on the market in 2014 will contain additional text reminding growers that the seeds have been treated with an insecticide and directing them to follow BMPs to reduce pollinator exposure to dust at planting.
3. **Improved Technology:** Substantial resources have been dedicated to improving seed coating quality, seed flow lubricants, and planting equipment to help keep the insecticide on the seed in order to substantially reduce dust. Initial testing indicates that replacing traditional lubricants could reduce total dust by up to 90% and total active ingredient in the dust by up to 60%.

   Some of these innovations have already been introduced and the plan is for others to be available for broad use by the industry beginning in 2014.
4. **Lifecycle Stewardship:** Additional standards are being developed, and will be enforced by the

industry, around the handling, storage and use of seed treatments and treated seed, from development to disposal of seed and seed bags.

5. **Giving Farmers Choice**: We will continue to ensure that farmers have access to a range of products including untreated seed, fungicide-only treated seed, and seed treated with fungicides and insecticides.

Farmers around the world face the daunting challenge to feed, clothe and fuel an ever-growing world population and Canadian farmers are in the enviable position to lead that effort. However, in order to do so, farmers need access to new technologies to continue to increase productivity in an environmentally sustainable fashion. We understand that pollinators and crop protection products are complementary and integral components of a sustainable agricultural system. We look forward to an ongoing dialogue and continued action to find sustainable solutions for our industry, the Canadian economy, and the health of our environment.

Respectfully signed:

Grain Growers of Canada
Canola Council of Canada
Canadian Canola Growers Association
Canadian Seed Trade Seed Trade Association
CropLife Canada

CC:
Honourable Gerry Ritz, Minister of Agriculture and Agri-Food
Honourable Leona Aglukkaq, Minister of Environment
Honourable Verlyn Olson, Minister of Agriculture and Rural Development, Alberta
Honourable, Diana McQueen, Minister of Environment and Sustainable Resource Development, Alberta
Honourable Lyle Stewart, Minister of Agriculture, Minister Responsible for Saskatchewan Crop Insurance Corporation
Honourable Ken Cheveldayoff, Minister of Environment, Saskatchewan
Honourable Ron Kostyshyn, Minister of Agriculture, Food and Rural Initiatives, Manitoba
Honourable Gord Mackintosh, Minister of Conservation and Water Stewardship, Manitoba
Honourable Kathleen Wynne, Premier of Ontario, Minister of Agriculture, Ontario
Honourable Jim Bradley, Minister of the Environment, Ontario
Honourable François Gendron, Minister of Agriculture, Fisheries and Food, Québec
Honourable Yves-François Blanchet, Minister of Sustainable Development, Environment, Wildlife and Parks, Québec
Honourable Michal Olscamp, Minister of Agriculture, Aquaculture and Fisheries, New Brunswick
Honourable Bruce Fitch, Minister of Environment and Local Government, New Brunswick
Honourable John MacDonell, Minister of Agriculture, Aquaculture and Fisheries, Nova Scotia
Honourable Sterling Belliveau, Minister of Environment, Nova Scotia
Honourable George Webster, Minister of Agriculture, Prince Edward Island
Honourable Janice Sherry, Minister of Environment, Labour and Justice, Prince Edward Island
Honourable Tom Marshall, Minister of Natural Resources, Minister Responsible for the Forestry and Agr-Food Agency, Newfoundland and Labrador
Honourable Tom Hedderson, Minister of Environment and Conservation, Newfoundland and Labrador
Grain Farmers of Ontario
Fédération de producteurs de cultures commerciales de Québec