A Perspective on Provincial Regulatory Approaches to Neonicotinoid Seed Treatments

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CropLife Canada is the trusted, unified voice of Canada's plant science industry

Representing

Canadian developers, manufacturers and distributors of pest control products and products of modern plant breeding.

Regulating Pesticides in Canada

- Power to regulate is shared among the federal, provinces and municipalities:
  - Federal: Pesticide registrations, marketing and labelling
    - The Pest Management Regulatory Agency of Health Canada
  - Provinces: Sale, use, storage, transportation and disposal of pesticides registered by the federal government. They also have the power to restrict or prohibit the use of registered pesticides in their own jurisdiction
  - Municipalities: Could regulate the uses of pesticides

Neonicotinoids extensively reviewed in Canada

- Extensively reviewed over the past 10 years:
  - 2019: decisions on risks to pollinators from exposure to neonicotinoids
  - 2021: decisions on risks to aquatic invertebrates from exposure to clothianidin and thiamethoxam
  - 2021: decision on health and environmental reviews of imidacloprid
  - 2022: decisions on potential risks to squash bees from exposure to neonicotinoids
- Neonic seed treatment confirmed as safe – corn, soybean, canola, among others.

Treated Seeds Integral Part of IPM Strategy

- Protect plants when most at risk – leading to healthier plants that can withstand negative pest or environmental stress
- Accurate placement in the seed bed reduces risk of exposure for both growers and non-target species
- Volume of product required to treat seed is less than what is required for full field soil or foliar application, contributing to reducing pesticide loading on a planting area

Ontario – Regulation

- The Ontario Ministry of the Environment, Conservation and Parks administers the Pesticide Act and Regulation 63/09
- Substantial changes made in 2020 – well received by industry
- Class E Pesticides: soybean and corn seeds coated with imidacloprid, thiamethoxam or clothianidin
- Apply to corn seed grown for grain or silage and soybean seed
- Requirements apply to the purchase and planting of treated seeds but not to the transport and storage
- 2022 acreages:
  - Corn: 2.2 million acres
  - Soybean: 3.1 million acres

Ontario: Requirements for Growers

- Complete the integrated pest management training:
  - To be completed once/ does not expire
  - Certification
- Complete a risk assessment and a pest risk assessment report
  - Soil pest scouting, crop damage or pest risk criteria
  - Assessment complete once
- Sign an IPM written declaration stating that IPM principles were considered in your decision
- Certificate, report and declaration to be shown when buying treated seeds

Ontario Regulations: Considerations

- Non regulatory approach preferable:
  - Best management practices developed in collaboration with industry – achieve same objective while minimizing regulatory burden
- Elements to consider:
  - Certification and assessment completed only once – reducing impacts on resources
  - Recognize grower expertise and ability to make informed decisions
  - Recognize use of seed treatment as part of an IPM strategy

Quebec: Regulation

- The Ministry of Environment, the Fight Against Climate Change, Wildlife and Parks administers the Pesticide Act, the Pesticide Management Code and the Certificates and Permits regulation
- Requirements adopted in 2018
  - Arbitrary pesticide reduction target
- Class 3A Pesticides: neonic treated seeds corn (grain, silage), sweetcorn, soybean, canola, oat, wheat, and barley
- 2022 acreages:
  - Corn: 892,000 acres
  - Soybean: 1 million acres

Quebec: Requirements for Growers

- Obtain an agronomic justification and a prescription:
  - Provided by a certified agronomist following agronomic assessment
    - Assessment: Soil type, geographic region, organic matters, tillage practices, crop rotation, pest presence
    - Three levels of risk – low, moderate or high – seed treatment only prescribed when risk level high
  - Justification/prescription valid only for 1 year
  - Permit/certificate required for buying/applying pesticides
  - Growers required to maintain pesticide registry - Record kept for 5-year
- Financial penalties for non-compliance
- Sale of pesticides are to be reported annually to the government

Quebec Regulations: Impacts on Growers

- Additional burden on growers while products already registered at the federal level = safe
- Dramatic reduction of use of neonic treated seeds resulting in less options for growers to address pest issues in their fields
  - Limited number of agronomists providing justification/prescription
  - Insufficient market signals leading to less offer
- Lack of recognition of growers' ability to assess their fields and identify their needs
- High impact on resources, financial and human, for the growers, government and agronomists
- Burdensome and unnecessary paperwork

Science-Based Approach to Support Ag Competitiveness

- Align with federal regulations – science-based risk assessments
  - Tools registered at the federal level should be available for use by growers in all provinces
- Based and informed by science and scientific data
- Predictability and transparency key to inform commercial decisions on products/innovative tools to bring to a market
- Recognize growers knowledge and expertise
- Allow for timely response in the field
- Consider impacts on human and financial resources

With pest pressures and environmental conditions changing because of climate changes, growers need all tools to be able to adapt and continue to produce safe, abundant, and nutritious food and feed

Thank you

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