



August 9, 2013

Honourable Gerry Ritz
Minister of Agriculture and Agri-Food
House of Commons
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Dear Minister Ritz

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/foiar 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 Association
CropLife Canada

CC:

Honourable Leona Aglukkaq, Minister of the Environment
Honourable Pat Pimm, Minister of Agriculture, British Columbia
Honourable Mary Polak, Minister of Environment, British Columbia
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