



CANADIAN SEED TRADE ASSOCIATION
L'ASSOCIATION CANADIENNE DU COMMERCE DES SEMENCES
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Pollinator Health and Seed Treatments
Senate Standing Committee on Agriculture and Forestry
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Speaking Notes

On behalf of the Canadian Seed Trade Association, I would like to thank this Committee for the invitation to meet with you to discuss the importance of pollinator health.

As the Chair noted, my name is Peter Entz. I am the current President of the Canadian Seed Trade Association, and am also the Assistant Vice-President, Seed and Traits for Richardson International in Winnipeg Manitoba. I have with me Stephen Denys, who is the Past President of the CSTA. Stephen is the Vice-President, Sales and Marketing with Pride Seeds in Chatham Ontario, and he is an active farmer, producing corn and soybeans on his farm near Paincourt..

CSTA represents 130 seed company members, who are involved in all aspects of the seed industry; from research, development and plant breeding, to production, processing, marketing and trade. Our membership ranges from small family owned grower/retailers to the world's multinational companies; and from marketers of small packet herb and vegetable seeds to large grain handling companies.

Our members are engaged in all production systems – organic, conventional, and systems using modern biotechnology, and they work with more than 50 different crop kinds. Our members are fierce competitors in the market place, but they come together as CSTA so support our mission which is: to foster seed industry innovation and trade.

I want to make it clear at the beginning of my presentation that the safe and responsible use of seed treatments is one of our Association's highest priorities.

Our members recognize that the seed industry has a role in ensuring that the seed applied crop protection products, or seed treatments, are used in a safe and responsible manner to minimize the potential risk to the environment, including our pollinators. Bees and native pollinators are critical for the production of many crops and for the overall success of the Canadian agriculture sector.

In recognition of this role and responsibility, CSTA facilitated the creation of the '*Seed Applied Insecticide and Pollinator Health Value Chain Coalition*' last summer to begin an open and honest dialogue concerning the recent events around pollinator mortality, and to agree on and implement actions.

The coalition brings together grower groups, developers, applicators, marketers and users of seed treatments and treated seed who are committed to maintaining the highest possible standards for the development, application and use of all crop production inputs, including neonicotinoid seed treatments.

The value chain coalition identified 5 keys areas where working together, we can make a difference and can demonstrate our commitment to being good stewards of the land and mitigating risk to pollinators. The steps that we identified and on which we are focused are:

- Promotion of Best Management Practices for planting treated seed;
- Identifying on seed labels when corn and soybean seed has been treated with neonicotinoids;
- Introduction of Improved technology that will reduce the dust generated during planting;
- Improving Lifecycle Stewardship of the handling, collection and safe disposal of empty seed bags; and
- Giving Farmers Choice from a range of product options including untreated seed.

Since last summer we have been following through on these commitments to ensure that all the necessary steps are taken to protect pollinators during the 2014 planting season and beyond.

For example:

- CSTA members have strongly endorsed the Pest Management Regulatory Agency's Best Management Practices. Our members have been training their staff on the Best Management Practices and educating their retailer and grower customers about the importance of adhering to the risk mitigation steps.
- Mitigating the possibility that pollinators will come into contact with the active ingredient in the dust generated during planting has been identified by PMRA as an essential step towards protecting pollinators. The agency has stated that if seed flow lubricants are going to be used with seed treated with neonicotinoids, a new fluency agent that reduces the active ingredient in dust at planting must be used.

Seed companies do not normally carry or sell seed flow lubricants however, CSTA member companies will be selling and distributing the product to their grower and retailer customers as a stewardship initiative for 2014.

- Our members worked with PMRA to develop new labeling for corn and soybeans that have been treated with neonicotinoids. Although the additional labeling was not scheduled to be implemented until 2015, our members stepped up and will be adding the new PMRA labeling to treated corn and soybeans for the 2014 season.

The additional labeling will appear on all pallet IDs, will be placed in the sleeve/pocket of all bulk containers and polywoven bags and appear on invoices, where possible. For 2015 the labeling will also be added to all seed tags.

- CSTA is working with CleanFARMS, a not-for-profit, industry stewardship organization, to ensure the safe disposal of empty seed bags. CSTA is a member of the steering committee that is overseeing a Seed Bag Collection Pilot that is entering in its second year of operation this planting season in Ontario and Quebec.

- Our members are also making good on their commitments to give their farmer customers the choice of a number of different seed options including untreated seed. They have expanded the number of varieties and maturity zones for which these options are available.

CSTA is committed to keep working with farmers, the industry, policy makers and regulators to develop and implement actions that will continue to give farmers the tools that they need while protecting our pollinators.

We look forward to participating in the discussions at the new Bee Health Task Team, led by Agriculture and Agri-Food Canada. The task team will focus on all of the factors that impact pollinator health such as Varroa mites, genetics, nutrition, over-wintering and insecticides.

So why seed treatments? (*Stephen Denys*)

Seed treatments, including those containing insecticides like neonicotinoids, are the least environmentally intrusive method of controlling insects that are an annual concern for many crop types, including corn and soybeans.

Safe and targeted use of neonicotinoid seed treatments reduces the amount of chemical used on large areas of farmland by reducing or eliminating foliar sprays.

Seed borne insecticides are also an important tool for Canadian growers and industry. They reduce threats to the seedling that could impact plant stand and yield, and because they replace foliar sprays, they help to conserve resources such as water, soil nutrients, energy and labour, while substantially reducing the presence of the insecticides in the environment.

Without access to 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.

In conclusion, the seed sector understands that pollinators and crop protection products are complementary. They are both integral components of a sustainable agricultural system.

We are committed to continuing to work with our regulators and the whole value chain to ensure the safe and responsible use of all seed borne crop protection products, including neonicotinoid seed treatments.

We strongly urge this committee to remain steadfast in the support of science as the foundation for regulatory and trade decisions. Sound scientific principles are measurable and reproducible. Regulatory assessments and approval process based on science ensure that all products are assessed consistently, giving confidence to consumers and to the developers of innovation. It is important that regulatory agencies are clearly instructed to remain focused on science.

Thank you and we look forward to your questions