



November 24, 2014

The Honourable Kathleen Wynne
Premier of Ontario
Legislative Building, Room 281
Queen's Park
Toronto, ON M7A 1A1

Dear Premier,

We understand that the government is planning to announce target reductions in the amount of neonicotinoid-treated corn and soy seed planted in Ontario. The agriculture industry has met with you, the Ontario Ministry of the Environment and Climate Change, and the Ontario Ministry of Agriculture, Food and Rural Affairs over the past year to discuss the value and benefits of treated seed in a sustainable agricultural system and to develop a collaborative path forward. We are extremely disappointed that the government has chosen a non-science-based approach that will harm, rather than help, the environment.

The agriculture industry in Ontario is united that non-science based targets are the wrong approach. As stewards of the land, we know that this will hurt, rather than help, our environment, which is why we will stand together to strongly oppose this policy.

Neonicotinoid seed treatments have allowed farmers to adopt conservation tillage or no-till farming as the seed treatment technology helps protect the crop from pest pressures that may result under minimum tillage. The loss of neonicotinoid seed treatments will significantly reduce the number of acres of conservation tillage and zero-till farming in Ontario because farmers will no longer be able to control the insects that thrive under these conditions. Increased tillage will result in an immediate increase in greenhouse gas emissions both from decreased soil carbon sequestration and increased fuel use. This certainly does not square with the provincial government's stated goals on climate change and environmental stewardship.

The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) has been working with farmers to encourage the planting of cover crops either within or after the harvest of grains, cereals and vegetable crops. The loss of neonicotinoid-treated seeds will significantly reduce the acres of cover crops planted in Ontario because, again, farmers will no longer be able to control the insects that thrive under the conditions that cover crops create. Farmers will instead rely on intense tillage practices to reduce residue cover and the insect problems that residues foster. Cover crops have numerous environmental benefits including reducing erosion, increasing organic matter and nutrient content, and improving soil fertility. To discourage them runs completely contrary to the stated policy goals of OMAFRA and the government. This proposed approach, in fact, runs contrary to your mandate letter to Minister Leal, which references making the agriculture sector resilient to climate change.

Insecticide-treated seed significantly reduces the quantity of pesticide used, provides targeted protection of crops against insects at their most vulnerable life stage and reduces potential exposure of non-target organisms, such as humans and beneficial insects, to the insecticide.

As an industry we recognize the critical importance of pollinator protection. We have been working closely with Health Canada and all agricultural stakeholders, including beekeepers, to make improvements to protect pollinator health and we know there was a reduction of 70 per cent of bee incidents in the 2014 planting season. Clearly we're on the right path. Several beekeeper associations across Canada have in fact openly stated their concerns about moving away from a science based evaluation policy given the lower risk to bee health associated with the use of seed treatments versus alternative strategies.

The agriculture industry remains open to constructive forward-thinking solutions. A decision to implement target reductions on the amount of neonicotinoid treated seed planted in Ontario is not supported by science and has not been field tested. The approach the Ontario government is proposing is ill-advised and goes against the very protection goals the government is seeking to achieve. It is certainly not the 'IPM' approach upon which other pesticide programs are currently based.

We strongly urge the provincial government to reconsider this approach and instead begin working with Ontario's entire agriculture sector on collaborative approaches that provide positive solutions for the environment. Ontario farmers have been excellent stewards of the land for generations and in particular over the past several years have improved the health of Ontario soils and the species represented in and on them by adopting the very technologies the government is aiming to remove from the market. Ontario farmers deserve more trust and consideration from the provincial government than they are being afforded at present.

Yours sincerely,

