



National Farmers Union – Ontario
Strong Communities. Sound Policies. Sustainable Farms.
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January 23, 2015

Ministry of Agriculture, Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West
Floor 2
Guelph Ontario
N1G 4Y2

Re: Pollinator Health – A Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario
EBR Registry Number: 012-3068

The National Farmers Union in Ontario (NFU-O) welcomes the opportunity to submit comments through the Environmental Registry to the Ministry of Agriculture, Food and Rural Affairs on the discussion paper *Pollinator Health – A Proposal for Enhancing Pollinator Health and Reducing the Use of Neonicotinoid Pesticides in Ontario*. Please see the attached document for our detailed comments.

As farmers in Ontario, the members of the NFU-O are deeply committed to working with nature to produce healthy food and to protect and enhance biodiversity within and around our farms. We advocate for agricultural practices that are economically, socially and environmentally sustainable and built on the principles of food sovereignty. By working with and building our own knowledge and skills of agro-ecology we strive to protect the many organisms, including bees and wild pollinators, which provide economic benefits to our farms and contribute to a more beautiful countryside. Based on our commitments above, the NFU-O supports the approach taken by the Government of Ontario in its Pollinator Health proposal. We support the move to restrict the use of neonicotinoid treated corn and soybean seed to those acres which can demonstrate the need for treated seed and the commitment to increase the practice of Integrated Pest Management.

Respectfully submitted by
The National Farmers Union – Ontario
January 2015

cc: Premier Kathleen Wynne
cc: Hon. Jeff Leal, Minister of Agriculture and Rural Affairs
cc: Hon. Glen Murray, Minister of Environment and Climate Change
cc: Mr. Toby Barrett, PC Agriculture Critic
cc: Mr. John Vanthof, NDP Agriculture Critic

Section A: Improving Pollinator Health

This is the non-regulatory part of the Ontario Government’s proposal and includes actions already being taken by the Ontario Ministry of Agriculture, Food and Rural Affairs and farmers.

Questions from Discussion Paper	Comments
<p>1. Four key stressors related to pollinator health have been identified. From your perspective, are there any other key pollinator health issues that need to be addressed in order to meet the overwinter mortality target of 15 per cent?</p> <ul style="list-style-type: none"> a. Pollinator Habitat and Nutrition b. Pesticide Exposure c. Diseases, Pests, Genetics d. Climate Change and Weather 	
<p>2. Looking at the four areas, what are some actions or activities that industry, individuals, organizations, government and others could take to improve pollinator health?</p>	<p>government continue to evaluate and monitor the insect pests that may cause early season insect damage to corn and soybeans across the province</p> <p>government increase extension services to farmers on alternatives to neonicotinoid insecticides to control pests, on how to evaluate for the presence of early season pests and on increasing on-farm biodiversity to provide habitat for pollinators</p> <p>update the Ontario Pesticide Safety Course to incorporate more information on integrated pest management and the protection of pollinators</p> <p>government funded field trails to assess yields from crops grown with and</p>

	<p>without neonicotinoid seed treatments, other chemical pest control agents and non-chemical alternatives</p> <p>both governments and organizations, e.g. NFU, provide information on how farmers and the public can increase biodiversity across the landscape and provide habitat for bees and native pollinators</p>
<p>3. How can we improve our outreach and education on the importance of pollinators?</p>	<p>➤ monitor bee and other pollinator populations and make the information available to the public</p>
<p>4. What are the benefits of improving pollinator health?</p>	<p>more biodiverse agricultural and natural landscapes</p> <p>pollinators for fruit and vegetable crops grown in Ontario</p> <p>strengthens food sovereignty</p>

Section B: Reducing Neonicotinoid Use

This is the regulatory part of the proposal. Under this proposal the sale of neonicotinoid treated corn and soybean seed would be restricted. In order to purchase neonicotinoid treated seed a person would have to:

- be a “Qualified Farmer” or licensed agriculture exterminator
- complete focussed Integrated Pest Management Training for growing corn and soybeans
- document pest management activities taken to reduce pest threats
- obtain verification of the assessment by a third party
- complete a credible risk assessment that demonstrates the need to use neonicotinoids
- treated corn and soybean seed

Questions from Discussion Paper	Options/Comments
<p>1. What are the positive and negative impacts of this proposed regulation?</p>	<ul style="list-style-type: none"> ➤ could help protect pollinators ➤ a lot of responsibility for grain farmers who may lose yield, quality and income, with no option to re-coup the losses ➤ allows the use of neonicotinoid seed treatments when the need identified and verified, it is not a moratorium ➤ more paper work for grain farmers ➤ more work for someone to do the verification - who will pay for the verification? ➤ seed corn crops are exempted from the regulation, should soybean seed crops be exempted as well? ➤ will this regulation lead to a push to treat more winter wheat seed with NNI?
<p>2. Is this regulatory proposal sufficient to reduce the acreage of treated corn and soybean seed by 80% by 2017? Do you have any other suggestions?</p>	<ul style="list-style-type: none"> ➤ if increased government support/extension is made available on IPM, monitoring/evaluation of pests, and the verification process ➤ seed companies will need to make untreated seed available to farmers, which may be a challenge since much corn seed is treated outside of the province ➤ farmers need to know they have the best varieties available as

	<p>untreated seed, if they are required to use untreated seed</p> <ul style="list-style-type: none"> ➤ what incentives could encourage farmers to follow through on requirements under the regulation
<p>3. Are there any alternative conditions of use for treated corn and soybean seed that should be considered?</p> <p><u>Demonstrating Need</u></p> <p>How would the requirement to demonstrate need change a farmers approach to assessing level of risk for soil pests?</p> <p>What additional tools would farmers need to better assess risk and determine need?</p> <p>Are some geographic areas always going to be high risk?</p> <p>Are there other ways that a farmer could demonstrate treated seed is needed?</p> <p>What kind of documentary proof would be reasonable to demonstrate need?</p>	<ul style="list-style-type: none"> ➤ OMAFRA needs to provide more extension services to assist farmers to assess the need for treated seed ➤ information needs to be available to farmers on what alternatives are available, if monitoring indicates low or no risk but pests are a problem after planting ➤ documentary proof should be easy for farmers to fill out, they should have access to support by phone or in-person at no cost to help fill out documentary proof
<p>3. continued ...</p> <p><u>Farmer/User Education and Training - re. requirement to be a qualified farmer</u></p> <p>Do you have any comments on the proposal for the buyer to be a qualified farmer or agricultural exterminator?</p> <p>Should the training/education requirements be the same as what is required now to buy and use</p>	<ul style="list-style-type: none"> ➤ representatives from the Ontario Pesticide Safety Course program said on December 18 that they could deliver enhanced IPM training for corn and soybeans but would need support to develop the course and train trainers ➤ Pesticide Safety Course reps suggested the possibility of a half day IPM

<p>pesticides on-farm? What about requirements for custom operators?</p>	<p>focused course which could take place the same day as the Pesticide Safety Course. They also said they would be able to deliver a lot of courses quickly, if needed to meet deadlines.</p> <ul style="list-style-type: none"> ➤ Farmers should not be required to pay for IPM training, since they are already bearing the risk from the restrictions on neonicotinoids.
<p>3. continued</p> <p><u>Farmer/User Education and Training - re. completion of IPM training and documentation of IPM activities</u></p> <p>Will IPM training be an effective means of conveying that NNI-treated seed be used as a measure of last resort? Should focussed IPM training be (a) stand-alone or (b) a new component of the existing Grower Pesticide Safety Course? Are there barriers to completing the training/education? E.g. on-line course or home study? What kinds of IPM activities would be reasonable for farmers to document in writing? Should documenting IPM activities be required on a field-by-field basis? Does it matter if fields are owned, rented, sharecropped? Barriers faced by farmers in practicing IPM? Are there ways to minimize record-keeping and paperwork?</p>	<ul style="list-style-type: none"> ➤ Pesticide Safety course representatives said that the test is a barrier to some farmers taking the course. ➤ Examples could be taken from the organic certification programs and adapted, where record keeping and documenting IPM activities – eg. field history, this documentation could be used as support for when request in the use of a restricted substance.

<p>3. continued ...</p> <p><u>Considerations for sellers of NNI treated seed</u> Suggestions regarding proposals for disclosing information to farmers before buying seed? What information would help farmers when ordering seed? Are there ways to minimize costs and barriers for those who sell seed?</p>	<ul style="list-style-type: none"> ➤ potential challenges for seed dealers in terms of potentially having to be the 'gate keeper' and liability
<p>4. Are there alternative management practices or rules for use that could minimize immediate and long-term exposure of pollinators to NNIs that should be included in the regulation? Any comments on proposed rules for using NNI-treated seed? Are they management practices that most farmers already use? Are there additional or alternative rules that should be considered? What kinds of barriers or costs due to the rules? Are there ways to minimize costs?</p>	<p>The proposed regulation would require farmers to use deflectors on negative vacuum planter, to follow label directions set by seed supplier or PMRA, the use of fluency agent, proper disposal of seed bags, cleaning up any spilled or exposed seed or dust.</p> <ul style="list-style-type: none"> ➤ It is not always possible to predict pest outbreaks. NNI-treated seed is an assurance against unexpected outbreaks. Not having alternatives if an outbreak should happen to occur is a barrier. ➤ Farmers are not able to pass on the costs of complying with the regulation. This is a barrier.

	<ul style="list-style-type: none"> ➤ There needs to be a means to reward farmers who do not use neonicotinoids over a long term basis. ➤ Ontario Bee Inspectors should have an app that shows all users of neonicotinoids - information that they can share with bee keepers.
<p>5. Are there other factors such as environmental considerations that could be incorporated into the decision of the need to use NNI insecticides? Environmental considerations might include setbacks from surface water or bee colonies. How can environmental considerations be brought into decision-making around NNI-treated seed? Are there special circumstances where a farmer might have to take additional precautions?</p>	<ul style="list-style-type: none"> ➤ recommend publicly funded programs to monitor soil as well as surface and ground water sources for residual neonicotinoid levels before and after restrictions come into place ➤ recommend publicly funded programs to monitor bee and other pollinator population counts before and after restrictions come into place ➤ all chemicals have implications for the environment. The NFU recommends more public interest research and promotion of alternative and ecological farming practices which do not depend on the use of chemical pesticides. The could include research and extension information on more diverse and longer crop rotations and increased use of cover crops ➤ set back of a crop from an existing bee colony
<p>6. Are there any related geographic considerations that could be incorporated into the regulatory proposal? Is it practical to treat some areas of Ontario differently under this regulatory proposal?</p>	<ul style="list-style-type: none"> ➤ currently some early season pests are not a problem in some parts of Ontario, but pests do expand their range over time or due to a changing climate. All of Ontario could be treated the same under the regulation, but assessment tools, IPM training, extension personnel and verifiers could all be fully aware of the geographic differences and

<p>How could the proposal be modified to incorporate geographic considerations?</p>	<p>could share that information with farmers</p>
<p>7. What qualifications would be appropriate for third parties to support this regulatory proposal? What individuals would be in a position to provide this third party confirmation? Could CCA's serve as third parties? Are there any other categories of people who could provide this third party confirmation? What kinds of professional or other qualifications should be required of these individuals?</p>	<p>Who is going to do the third party verification?</p> <p>Options</p> <ul style="list-style-type: none"> ➤ OMAFRA staff -are independent, do not have liability concerns ➤ Certified Crop Advisors - those working for input suppliers may not be viewed as third party <ul style="list-style-type: none"> - independent CCA's are concerned about liability - not all farmers have independent CCA's in their communities - there may not be enough independent CCA's in the province to do this task ➤ Agricorp has field staff across the province ➤ Pesticide Safety Course trainers have knowledge but not experience doing farm visits ➤ Organic Inspectors are familiar with verification process but do not have experience with the use of chemical pesticides or conventional farm practices <p>Who is going to pay for this verification?</p> <ul style="list-style-type: none"> ➤ Farmers are not able to pass on the additional costs of the verification.
<p>8. Please provide any comments on the proposal or related issues that you feel have not been addressed</p>	<ul style="list-style-type: none"> ➤ Many urban people and non-farmers are supporting this regulation. The risk of lost of yield or quality will be carried by grain farmers.

<p>in the questions above.</p>	<p>OMAFRA has seen its budget cut year after year and county OMAFRA extension people have disappeared. Without independent OMAFRA funded extension people, farmers have had to rely more and more on company reps for information on pest control, etc. There needs to be public support in terms of dollars to OMAFRA for this regulation to succeed - dollars that would be used for extension, for developing and delivering the IPM course, for guiding farmers through the documentation required, to do training on scouting etc.</p> <ul style="list-style-type: none">➤ As currently set up, crop insurance would not cover the potential losses to grain farmers from this regulation. There should be a reworking of corn and soybean crop insurance if the regulation goes ahead, taking into consideration their Average Farm Yield and their Guaranteed Production.➤ The NFU supports the use of the precautionary principle when considering the impacts of pesticides.➤ Consider branding Ontario's grain as neonicotinoid-free with the aim to make it the preferred product in domestic and export markets.➤ Consider establishing a floor on the discounts allowed for poor quality, enacted over the same time frame as the regulation and parallel to it.
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