



Canadian Section of The Wildlife Society

“The mission of the Canadian Section of The Wildlife Society is to foster excellence in wildlife stewardship through science and education among wildlife professionals in Canada”

13 November 2018

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario
Address Locator: 6606D2
K1A 0K9

RE: Canadian Section of The Wildlife Society feedback on phasing our Neonicotinoid Pesticides Proposed Special Review Decision PSRD2018-02

On behalf The Canadian Section of The Wildlife Society (CSTWS), I am pleased to provide our perspective and recommendations on Canada’s Pest Management Regulatory Agency decision to phase out certain neonicotinoid pesticides. The CSTWS is a non-profit professional and scientific organization with more than 300 members in six Provincial Chapters and nine Student Chapters at colleges and universities across Canada and is affiliated with more than 10,000 wildlife professionals and students across North America. Members are employed by government and non-government organizations, industry, professional consultants, and universities. Many of these professional biologists and managers are world-renowned experts in conservation and wildlife habitat management. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The CSTWS would like to commend the Government of Canada for taking the steps to phase-out neonicotinoid pesticides. This includes the 2016 proposed ban on outdoor uses of imidacloprid and the current proposal to phase out thiamethoxam and clothianidin. This is particularly notable given the important role these pesticides play in agricultural production in Canada by controlling insect pests. Our review of this issue and understanding of existing scientific research brings forward several concerns important to the CSTWS related to unintended environmental impacts associated with the use of these pesticides, some of which are highlighted here.

Declines in bee and other pollinator populations have generated considerable scientific and public concern due to the ecosystem services they provide and their economic importance. Neonicotinoids can accumulate in soils and groundwater with potential input into aquatic systems. Research has also highlighted effects on aquatic and other non-target wildlife species, including fish and birds. These pesticides have the potential to persist in the environment for several years, further raising concern about the impacts on ecosystem function.

While the CSTWS understands that Canadian farmers need access to effective and economical pest management tools, we believe that the current body of research that has documented harmful effects is sufficient to transition to alternative pest management methods. We are proponents of taking a



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precautionary approach to decision making when supported by science. As such the CSTWS offers the following recommendations.

1. Continued investment in monitoring and evaluation of the impacts of existing neonicotinoid pesticides to better understand potential factors (e.g., topography, soil, field conditions) that may influence dissipation of chemical compounds and effectiveness of measures to mitigate risk.
2. Support for the development and evaluation of alternative target-specific compounds with a proven efficacy in pest control that have minimum impact on non-target species and low environmental risk.
3. Ensure short and long-term scientific studies of existing and novel compounds that accounts for different durations of exposure (e.g., acute, long-term, and pulsed exposures) and environmental conditions. This should include studies on the interactions with other chemicals and for different life-history stages of a representative selection of target and non-target species, with consideration of potential sublethal effects and shifts in community interactions. Work with the scientific community, industry, and stakeholders to establish an approach that maintains evidence-based decisions in regulatory development of new compounds and alternate methods of pests control including Best Management Practices, while phasing out use of neonicotinoids in Canada.
4. Increase public awareness of scientifically-accurate information on neonicotinoids and the potential benefits and risks posed by alternative methods.

In addition to these perspectives and recommendations, I would like to share the Standing Position on Toxic Chemical Compounds prepared by The Wildlife Society as attached.

In closing, thank you for considering the CSTWS views on phasing out nicotine-based pesticides in Canada. Should you have any questions, please feel free to contact me.

Yours Truly,

A handwritten signature in black ink, appearing to read "Rick Baydack".

Dr. Rick Baydack
Certified Wildlife Biologist
2018-2019 President
Canadian Section of The Wildlife Society
Past President and Fellow, The Wildlife Society
Professor and Chair of Environmental Science and Studies
University of Manitoba

Attachment: