

Montréal, May 17, 2019

The Right Honourable Justin Trudeau
Prime Minister of Canada
1100, Crémazie Est
Bureau 220
Montréal (Québec)
H2P 2X2

Re: A half a million Canadians call for an immediate ban on bee-killing neonicotinoid pesticides in Canada

Dear Mr. Prime Minister,

Because our survival depends on our pollinators, the United Nations has designated May 20 as World Bee Day. Leading up to that day, our organizations, supported by nearly a half a million Canadians,** are calling on Canada's government to follow the European example and put an immediate ban on the use of neonicotinoid insecticides in Canada.

The importance of bees to our survival

Pollinators [contribute to 35% of the world's vegetable production](#), by helping to increase production of the world's principal food crops by 75%. A world without pollinators would be like a world without any food diversity, with disastrous consequences on the stability of human food. We would have to say goodbye to strawberries, tomatoes, coffee, chocolate and much more... the equivalent of one out of three mouthfuls on our plates!

Neonicotinoids—a serious threat to bees

Neonicotinoids are the most widely sold insecticides in the world. They were first known for their nefarious role in the worldwide decline in bee populations. Shortly thereafter, independent [scientists](#) discovered a vast array of harmful effects and concluded that they represent a serious threat to the planet's biodiversity, ecosystems and food security.

Canada has deferred and continues to defer taking action. It has published incomplete evaluations of these insecticides and has delayed the [already very slow and fragmented process of re-evaluating them](#) numerous times.

Canada has pushed back the risk-assessment and risk-management processes numerous times

While France has banned the use of neonicotinoids since September 2018 and Europe followed suit in December 2018, Canada has taken 7 years to announce any final decisions regarding the re-evaluation of the risks to pollinators from the three main neonicotinoids ([imadaclorpid](#), [thiamethoxam](#) and [clothianidin](#)).

The evaluation done by the Health Canada Pest Management Regulatory Agency (PMRA) minimizes the impact of coated seeds, which account for the widest use of neonicotinoids in Canada and are a major source of contamination. Its understated conclusions go against [similar evaluations carried out by the European Union](#), which confirm the risks posed to bees by all forms of neonicotinoid use.

The PMRA found that with certain risk attenuation measures, continued approval of products containing these neonicotinoids is acceptable. However there is no requirement for the proposed risk attenuation measures (labelling) to be displayed on products until 2021 at the earliest, or two years from now.

This decision is akin to allowing the immediate sale of a medication that causes serious side effects but waiting for two years to inform health-care professionals of any contraindications to prescribing the medication.

In 2016, the PMRA had also found that one neonicotinoid, imadaclorpid, presents unacceptable risks to aquatic life, which justified a complete ban on its use in agriculture over a period of 3 to 5 years, effective with the final ruling. Now, two and a half years after completing its scientific evaluation of this insecticide, the PMRA continues to hold off on a final decision until 2020. The same scenario exists for two insecticides that are widely used in Canada—clothianidin and thiamethoxam.

It is at the very least highly disturbing that, in spite of the international scientific consensus and the strong conclusions of our Canadian agencies, we should have to wait until 2023, or even 2025, to implement the justified ban on these dangerous pesticides in Canada.

Canadians are concerned

Canadians are very troubled by the harmful effects of neonicotinoids on our ecosystems: more than 460,000 of them have called for Health Canada to ban neonicotinoids since 2013. How can the public trust the PMRA to safeguard our health, our food safety and our environment considering these delays and the weak nature of the proposed restrictions?

Our demand

The PMRA has found that neonicotinoids pose unacceptable risks to the environment and that they need to be phased out. We urge you to require that the Minister of Health place an immediate ban the use of neonicotinoids in Canada.



Annie Bérubé
Director, Government Relations | Équiterre

*** Since 2013, more than 460,000 Canadians have taken part in campaigns, signed petitions and sent letters to the federal government in support of a quick ban on neonicotinoids. The Fédération des apiculteurs du Québec and the Ontario Beekeepers' Association are also campaigning for a ban on neonicotinoids in Canada. This figure of 460,000 reflects the number of unique signatures originating from within Canada (after the elimination of duplicates) received by letter-writing campaigns and petitions spearheaded by the following organizations:*

*Avaaz
David Suzuki Foundation
Environmental Defence
Équiterre
Leadnow
Nature Canada
SumOfUS
Wilderness Committee
Canadian Wildlife Federation
Ontario Nature*

Encl. List of names of the petition from Équiterre.

cc: Ms. Ginette C. Petitpas Taylor, Minister of health
Ms. Catherine McKenna, Minister of the Environment and Climate Change