

Minister of Health



Ministre de la Santé

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Ottawa, Canada K1A 0K9

Ms. Helen Rice  
President  
Alberta Urban Municipalities Association  
300-8616 51 Avenue  
Edmonton, Alberta T6E 6E6



Dear Ms. Rice:

Thank you for your correspondence, of January 12, 2015, concerning pollinators and neonicotinoid insecticides.

Health Canada's top priority is to protect the health and safety of Canadians, their environment and their food supply.

In Canada, pesticides are stringently regulated by Health Canada's Pest Management Regulatory Agency (PMRA). Before a product is approved for use in Canada, it must undergo a thorough science-based risk assessment and meet strict health and environmental standards. This includes the examination not only of long-term (lifetime) animal toxicity tests that assess the potential for the active ingredient to cause chronic, reproductive or developmental toxicity, cancer, or various other effects, but also of a variety of environmental toxicity studies that look at toxicity to birds, bees and aquatic organisms. If the specified use of a product poses risks of concern to human health, future generations or the environment, it is not registered for use in Canada.

The Department is aware of the importance of bees and the beekeeping industry to the production of food in Canada, as well as the issues regarding bee health, including concerns about potential chronic effects of pesticides. Health Canada scientists are working with scientists from universities and other organizations (e.g., Agriculture and Agri-Food Canada, provincial ministries of Agriculture and the Environment, the Canadian Association of Professional Apiculturists and other regulatory agencies in the U.S. and Europe) to determine whether pesticides are contributing to pollinator declines.

Although there is a link between reported bee mortalities and planting of neonicotinoid treated corn and soybean seed in the intense corn growing regions of Canada, there does not appear to be any impact in other areas

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where neonicotinoid pesticides are used extensively, such as canola growing regions. In the spring of 2014, Health Canada implemented measures to reduce pollinator exposure to pesticides from corn and soybean seed dust. A complete analysis is not yet available, but information to date indicates that the numbers and severity of incident reports associated with neonicotinoid pesticide use during the planting period in 2014 are 70 percent lower than in 2013. On November 25, Health Canada published an update on neonicotinoid pesticides and bee health, which is available at <http://www.hc-sc.gc.ca/cps-spc/pubs/pest/fact-fiche/neonicotinoid/neonicotinoid-eng.php>. Even though bee mortalities during planting were significantly reduced in this sector in 2014, the PMRA continues to work with the provinces and stakeholder groups to further reduce pollinator exposure during planting of corn and soybeans. Pending results of this work with the provinces and other stakeholders, additional regulatory measures may be taken if warranted and if supported by the available science.

The available science indicates that pollinator effects can result from sub-lethal exposure to neonicotinoids, but the conclusion cannot be drawn that actual environmental exposures from some uses are at levels that may result in effects. More work is needed in this area, and all available information will be considered in the neonicotinoid re-evaluation, which is being conducted in collaboration with the U.S. Environmental Protection Agency and the California Department of Pesticide Regulation. The potential for both acute and sub-lethal effects on pollinators will be assessed, considering available information from scientists and researchers as well as new studies being generated by the registrants to specifically address these questions. An interim report focusing on pollinators is expected as early as late 2015.

Health Canada applies a science-based approach to regulating pesticides. We will continue to work with national and international colleagues to closely monitor scientific information and other developments related to potential impacts of pest control products on pollinators, not only in Canada and the U.S., but also in Europe. Additional regulatory measures will be taken if warranted and supported by the available science.

I hope that my comments are helpful in addressing your concerns.

Yours sincerely,



The Hon. Rona Ambrose, P.C., M.P.