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**Pollinator Health and Seed Treatments  
A Submission to  
The Senate Standing Committee on Agriculture and Forestry  
Canadian Seed Trade Association  
March 6, 2014**

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## **Introduction**

*Seed is the driver of the innovation that the world's farmers will need to feed, fuel and clothe a world population that is expected to reach 9.3 billion in fewer than 40 years, while facing the challenges of climate change and competing demand for water, land and resources.*

*CSTA recognizes that industry has a role to play in ensuring that seed-applied insecticides are used in a manner that minimizes the risk of pollinator exposure. We all have a vested interest in the health and wellbeing of pollinators. They are critical for the production of many crops and for the overall success of the Canadian agriculture industry.*

*Industry is committed to maintaining the highest possible standards for the development, application and use of all crop production inputs, including neonicotinoid seed treatments.*

The Canadian Seed Trade Association (CSTA) welcomes the opportunity to meet with this committee today to discuss the importance of protecting pollinator health while ensuring that farmers continue to have access to seed treatment technologies that are so important for their success.

CSTA represents 130 companies involved in all aspects of the seed industry: plant breeding and research; production; marketing and distribution; packaging; conditioning; and international trade. CSTA members are engaged in all production systems - conventional, organic, and systems using modern biotechnology. We work with over 50 different crop kinds and members range from small, family owned companies to large multinational firms. The Canadian seed industry contributes nearly \$4 billion to the Canadian economy annually, with exports reaching 70 countries totalling over \$400 million and employing more than 14,000 Canadians.

It is estimated that 9 out of every 10 bites of food taken by people around the world start with the planting of a seed. Seed is the foundation of the world's food supply and is an important contributor to its supply of fibre, fuel and industrial products.

Seed is also the driver of the innovation that the world's farmers will need to feed, fuel and clothe a world population that is expected to reach 9.3 billion in fewer than 40 years, while facing the challenges of climate change and competing demand for water, land and resources.

CSTA recognizes that our industry has a role to play to ensure that seed-applied insecticides are used in a manner that minimizes the risk to pollinators. We all have a vested interest in the health and wellbeing of pollinators. They are critical for the production of many crops and for the overall success of the Canadian agriculture industry.

Recognizing that everyone in the value chain has a role to play, CSTA has engaged the value chain to facilitate dialogue and to take joint actions, to address the recent events around pollinator mortality.

*CSTA facilitated the creation of a 'Seed Applied Insecticide and Pollinator Health Value Chain Coalition'.*

To discuss and address issues surrounding pollinator health CSTA facilitated the creation of a 'Seed Applied Insecticide and Pollinator Health Value Chain Coalition' last summer. The industry led coalition brings together grower groups, developers, applicators, marketers and users of seed treatments and treated seed who are committed to maintaining the highest possible standards for the development, application and use of all crop production inputs, including neonicotinoid seed treatments.

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## **Our Commitments**

*The letter, sent by CSTA, on behalf of the coalition outlined 5 key commitments:*

- 1. Promotion of Best Management Practices*
- 2. Additional Labelling*
- 3. Improved Technology*
- 4. Lifecycle Stewardship*
- 5. Giving Farmers Choice*

The seed sector takes very seriously its role in mitigating risk to pollinators from treated seed. In August, 2013 the value chain coalition drafted a formal letter to the Federal and Provincial Minister's of Agriculture and the Environment outlining industry's commitments to being good stewards of the land and mitigating risk to pollinators. The letter, sent by CSTA, on behalf of the coalition outlined 5 key commitments:

- 1. Promotion of Best Management Practices:** Best Management Practices (BMPs) for planting treated seed have been developed by the regulators and will be promoted along the value chain. CSTA members will actively train their staff on, and openly discuss the use of, the BMP with growers and retailers.
- 2. Additional Labeling:** Corn seed bags on the market in 2014 will contain additional text reminding growers that the seed has been treated with an insecticide and directing them to follow BMPs to reduce pollinator exposure to dust at planting. Additional labeling is being developed and will be introduced for all treated corn and soybean seed bags for the 2015 season.
- 3. Improved Technology:** Substantial resources have been dedicated to improving seed coating quality, seed flow lubricants and planting equipment to help keep the insecticide on the seed in order to substantially reduce the active ingredient in the dust.

For the 2014 planting season only Bayer's new Fluency Agent will be permitted when planting neonicotinoid treated corn and soybeans. This new Fluency Agent significantly reduces the active ingredient left in the dust.

- 4. Lifecycle Stewardship:** Additional standards are being developed, and will be enforced by the industry, around the handling, storage and use of seed treatments and treated seed, from development to disposal of seed and seed bags.
- 5. Giving Farmers Choice:** We will continue to ensure that farmers have access to a range of products including untreated seed, fungicide-only treated seed, and seed treated with fungicides and insecticides. The choice of seed treatment options is customer driven.

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## Implementing Our Commitments

*CSTA has not only followed through on the 5 key commitments made in the summer of 2013, CSTA has also played a key leadership role.*

*CSTA member companies exceeded the regulated requirements by adding the new PMRA labeling to neonicotinoid treated corn and soybeans for the 2014 season.*

*CSTA and its members are committed to working together with industry, regulators and policy makers to reduce the dust generated during the planting of insecticide treated seed as well as informing, educating and training those who chose to use insecticide treated seed on its safe and responsible use, offering untreated seed and engaging the beekeeper community.*

Since making industry's commitments known last summer, CSTA has been hard at work following through and implementing those commitments, thanks in large part to the high level of engagement of CSTA's member companies. CSTA has been in regular contact with regulators and industry to ensure that all necessary steps are being taken to protect pollinators during the 2014 planting season and beyond.

CSTA has not only followed through on the 5 key commitments made in the summer of 2013, but we have played a key leadership role as the facilitator of dialogue between the value chain and Health Canada's Pest Management Regulatory Agency (PMRA)

CSTA members have broadly distributed PMRA's Best Management Practises (BMPs): *'Pollinator Protection: Reducing Risk from Treated Seed'* to their value chain partners and have been educating and training their staff and retailer and grower customers on the importance of following the steps outlined in the BMPs. CSTA has created several communication pieces and presentations for use by our members during grower meetings and at product launches, including a collaborative one page industry BMP with CropLife Canada entitled, *'Protecting Pollinators: What Can you Do?'*

CSTA's members worked with the regulators at PMRA to develop new labeling for corn and soybeans that have been treated with neonicotinoids. This additional labeling was not scheduled to be implemented until 2015, however CSTA member companies exceeded the regulated requirements by adding the new PMRA labeling to neonicotinoid treated corn and soybeans for the 2014 season. The additional labeling will appear on all pallet IDs, will be placed in the sleeve/pocket of all bulk containers and polywoven bags and appear on invoices, where possible. For 2015 the labeling will also be added to all seed tags.

CSTA and its members helped distribute, promote and educate grower and retailer customers about the use of the new Fluency Agent from Bayer CropScience as the only seed flow lubricant permitted for use when planting corn and soybeans treated with neonicotinoids, as mandated by PMRA. The selling and distribution of seed flow lubricants is not normal practice for seed companies as these are typically products sold at the retailer level. CSTA corn and soybean producers have agreed to supply the Fluency Agent to their customers as a stewardship initiative for 2014.

CSTA is working towards ensuring the safe disposal of treated seed and empty seed bags by contributing to, and participating on a steering committee of CleanFARMS, a not-for-profit industry stewardship organization that is running seed bag collection pilot project for the second year in Ontario and Quebec.

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*Industry has a role to play in mitigating risk to pollinators from treated seed.*

To give farmers choice, many CSTA members will be offering more treatment options for specific hybrids in different maturity zones beginning in 2014 including; untreated seed, fungicide treatments only, fungicide and insecticide, untreated with inoculants, fungicide and inoculants and seed treated with insecticide, fungicide and inoculants.

CSTA and its members are committed to working together with the value chain including farmers, regulators and policy makers to reduce the dust generated during planting to ensure the safe planting of insecticide treated seed. We are actively educating and training those who choose to use insecticide treated seed, to ensure that it is being used in a safe and responsible manner. Our members continue to offer untreated seed and are striving to continuously engage the beekeeper community.

CSTA supported the creation of a national forum to discuss all of the factors that impact pollinator health, including; genetic diversity, verroa mites, nutrition, over-wintering losses and insecticides. We are pleased to have been appointed to the national Bee Health Task Team that will be led by Agriculture and Agri-Food Canada. The Task Team will be holding a day long workshop in Ottawa towards the end of March to begin a national dialogue on pollinator health.

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## **Why Seed Treatments?**

*Neonicotinoid seed treatments are the only way to protect the seed from pests. There is no rescue treatment available for below-ground pest control after planting.*

*Safe and targeted use of neonicotinoid seed treatment reduces the amount of chemical used on large areas of farmland by reducing or eliminating the number of necessary foliar sprays.*

*Without access to neonicotinoid seed treatments production would drop and costs would rise sharply for both farmers and consumers. The economic costs would be heavy, and ironically the environmental costs would also be high.*

To meet future global food demand, farmers will have to increase their food production while being challenged by competition for land and water and by climate change. To meet these demands, production and yield must increase on a per acre basis. As such farming practices have changed. Farmers are increasingly planting seed earlier in the growing season to allow for a longer growing period to help maximize yields. This is especially true for corn and soybeans.

However, early season planting in cold and wet soils puts the seed and seedling at a greater risk. Neonicotinoid seed treatments help offset some of this risk because they offer protection when the plant is most vulnerable; as a seed and seedling. Currently neonicotinoid seed treatments are the only way to protect the seed from pests. There is no rescue treatment available for below-ground pest control after planting.

Seed treatments remain the least environmentally intrusive measure for controlling insects that are an annual concern in many crop types, including corn and soybeans, and as a result are an important tool for many producers. Safe and targeted use of neonicotinoid seed treatment introduces an efficient use of pesticides and reduces the amount of chemical used on large areas of farmland by reducing or eliminating the number of necessary foliar sprays.

The amount of insecticide used in seed treatments, like neonicotinoids, is typically less than 10% of that applied in-furrow and less than 1% of that from a broadcast/foliar spray treatment.

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*With increasingly high input costs, the modern farmer needs to maximize crop production. Every seed planted needs to grow.*

Seed-applied insecticides, or seed treatments, offer real and tangible benefits to the value chain by increasing productivity, facilitating sustainable farm incomes, and targeting the product where it is most effective. They are an important tool for Canadian farmers because they reduce threats to the seedling that could impact plant stand and yield, and they help to maximize resources such as water and soil nutrients, energy, money and labour.

Without access to neonicotinoid seed treatments production would drop and costs would rise sharply for both farmers and consumers. The economic costs would be heavy and ironically, the environmental costs would also be high.

With increasingly high input costs, the modern farmer needs to maximize crop production. Every seed planted needs to grow.

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## **Conclusion**

Farmers around the world face the challenge to feed, clothe and fuel an ever-growing world population. With advantages such as the Canadian environment and our progressive and environmentally conscious farm population, Canada can lead that effort. In order to do so, our farmers need to have access to technologies that increase productivity in an environmentally sustainable way.

The seed industry is committed to an ongoing dialogue and continued action to find sustainable solutions for our industry, the Canadian economy, and the health of our environment.

Our industry understands that pollinators and crop protection products are complementary and integral components of a sustainable agricultural system. We will continue to work with regulators and the whole value chain to ensure the safe and responsible use of all seed borne technologies, including neonicotinoid seed treatments.

CSTA urges you as policy makers to remain steadfast in your support of science as the foundation for regulatory and trade decisions. Sound scientific principles are measurable and reproducible. Regulatory assessments and approval process based on science ensure that all products are assessed consistently, giving confidence to consumers and to the developers of innovation. It is also important that regulatory agencies are clearly instructed to remain focused on science.

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