March 13, 2014

VIA ELECTRONIC MAIL
AND COURIER

< Minister_Ministre@hc-sc.gc.ca >
< rona.ambrose@parl.gc.ca >
The Honourable Rona Ambrose
Minister of Health
Health Canada
Brooke Claxton Building, Tunney's Pasture
Postal Locator: 0906C
Ottawa, Ontario
K1A OK9

Dear Minister Ambrose:

Re: Registration Decision RD2013-14 – Clutch 50 WDG, Arena 50 WDG and Clothianidin Insecticides – July 23, 2013

As you are aware, we are counsel respectively to the Sierra Club Canada, the David Suzuki Foundation, the Western Canada Wilderness Committee, and Équiterre (hereinafter the "Objectors") in connection with the above Registration Decision (the "Decision").

On September 19, 2013, we sent a Notice of Objection to you concerning the above matter requesting that you establish a panel to review the Decision. It has been almost six months since we filed the Notice of Objection. A new planting season will soon be upon us wherein these products likely will be used widely by the agricultural community. Our respective clients are concerned about your increasing delay in making the requested Decision.

We are confident that your office is aware that the clothianidin products that are the subject of the Notice of Objection have been allowed in Canadian commerce by the Pest Management Regulatory Agency ("PMRA" or the "Agency") for many years without having valid studies otherwise necessary for registration, including:

- Lysimeter study conducted in coarse textured soil with a water dispersible granule (WDG) formulation;
- Study of behaviour and fate of clothianidin in plants, including determination of concentrations in nectar and pollen; and
- Hive study designed to assess the chronic toxicity of clothianidin to bees (page 6 of Decision).

It would appear from the section 12 notices attached to this letter, issued by Health Canada/PMRA pursuant to the *Pest Control Products Act*, S.C. 2002, c. 28 (the "Act" or "*PCPA*"), as well as the PMRA reports referred to in the September 2013 Notice of Objection, that these studies have been requested by the Agency from the registration-holders since these clothianidin products were first registered in 2009 (See attached 2008-2009 section 12 notices requesting that the studies be submitted to PMRA by 2012, and the 2012-2013 section 12 notices requesting that the same studies be submitted to PMRA by 2015).

Moreover, it is clear from the attached section 12 notices (and the PMRA reports referred to in our September 2013 Notice of Objection) that the Agency has lacked a valid study on the chronic toxicity of clothianidin to bees since 2004, since the only study ever submitted in an attempt to fill this gap was "deemed unacceptable" by PMRA.

Furthermore, the section 12 notices have consistently indicated going back to 2008-2009 that the lack of "valid hive studies" to address the gap in chronic toxicity risk to bees "represents a critical data gap in the risk assessment of Clothianidin".

As you are aware, a valid and complete risk assessment is necessary to ensure that you meet your primary objective, under section 4 of the Act, of determining that a pesticide does not pose unacceptable risks to the environment before being registered. The section 12 notices make clear that these clothianidin products lack a valid and complete risk assessment because of the missing study or studies and, in the case of chronic toxicity to bees, clothianidin has lacked a valid study for approximately a decade.

This problem is long overdue for resolution. It cannot be solved in a timely manner by waiting until 2018, the current date mandated by PMRA for completion of the re-evaluation of the 87 registered products in the family of neonicotinoid insecticides, of which clothianidin is just one (See your Reply to Question No. 152: Inquiry of Ministry, dated November 25, 2013 - attached). By 2018, clothianidin will have lacked a decision on whether there is a valid study on chronic toxicity to bees for 14 years. Section 35(3) of the *PCPA* provides you with an invaluable tool to expedite consideration of the special problems surrounding critical data gaps for these clothianidin products: establishment of a review panel. We urge you to adopt this approach now as an expeditious solution to the problem.

Yours truly,

Joseph F. Castrilli
Counsel for Sierra Club Canada

Lara Tessaro
Counsel for David Suzuki Foundation, Western Canada Wilderness Committee, and Équiterre

Encl.

c.c. John Bennett, Sierra Club Canada
c.c. Mara Kerry, David Suzuki Foundation
c.c. Joe Foy, Western Canada Wilderness Committee
c.c. Sidney Ribaux, Équiterre

and to:

< richard.aucoin@hc-sc.gc.ca >
Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Postal Locator: 6606E
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9

Health Canada Santé Canada

Section 12 Notice — Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration

Product Name: **CLOTHIANIDIN TECHNICAL INSECTICIDE**
Registration Number: 27445
Application Number: 2006-7873
PMRA #: 1444640

During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **June 1, 2008,** and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 2 — CHEMISTRY REQUIREMENTS FOR TECHNICAL GRADE ACTIVE INGREDIENT

DACO: **2.13.3**
Title: **Batch data**

Required Data: **The applicant must submit data from the analysis of 5 batches of the TGAI from commercial scale production at the two alternate manufacturing sites (Leverkusen and Tokyo) using the specified processes.**

PART 4 — TOXICOLOGY

DACO: **4.8**
Title: **Developmental Immunotoxicity Study**

Required DATA: **A Developmental Immunotoxicity Study.**

When analysis of batches from full scale production of the chemical has been completed, additional toxicological studies may be required if differences in chemical composition were noted compared to the pilot scale production analysis.

Canada

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.4**
Title: **Special studies of environmental fate (A prospective groundwater monitoring study (PGW) with a study protocol submitted prior to the conduct of the study).**

Required DATA: **None at this time**

Note: As an interim measure, the following study is required in lieu of the PGW study to refine estimates of the amount of clothiandin likely to leach to groundwater. If these refinements are insufficient to reduce concern about clothiandin leaching to the groundwater, then a PGW study may be required.

DACO: **8.5**
Title: **Long term hydrolysis study (pH 7)**

Required DATA: **A full long-term hydrolysis study conducted at a lower temperature (10 ^{0}C) relevant to groundwater in Canada for one year or until a 50% decline is observed. As outlined in the letter of July 24, 2003 (Sexsmith to Lidstone), shorter term hydrolysis studies should also be run concurrently at several elevated temperatures (20, 30, 40, 50 ^{0}C) in order to determine if hydrolysis takes place at all, and to extrapolate to lower temperatures if appropriate. Absence of hydrolysis at elevated temperatures will allow the lower temperature runs to be terminated sooner than we would otherwise require.**

PART 9 ENVIRONMENTAL TOXICOLOGY

DACO: **9.2.7**
Title: **Acute oral toxicity study to other terrestrial invertebrates**

Required DATA: **Acute toxicity data to leaf-cutter bees.**

DACO: **9.6.2.3**
Title: **Acute toxicity to birds**

Required DATA: **Data on acute toxicity to house sparrow and red-winged blackbird are required.**

Health Canada Santé Canada

Section 12 Notice **Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration**

Product Name: **Clutch 50 WDG Insecticide**
Registration Number: **29382**
Application Number: **2008-0357**
PMRA # : **1848482**

During the conditional registration period which has been granted to **December 31, 2012**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **December 31, 2012** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a lysimeter study conducted with a WDG formulation is required.

DACO: **8.5**
Title: **Fate of Clothianidin in plants, including concentrations in nectar and pollen.**

Details: A potential risk to bees has been identified and this data is required to refine the risk assessment and determine the potential risk. The available environmental fate data for clothianidin indicates that the chemical is persistent and systemic and has the potential to accumulate in soils from year to year with repeated uses. New studies are required to generate the data necessary to characterize the potential exposure of pollinators to translocated Clothianidin in nectar and pollen resulting from spray applications. The applicant is required to discuss the protocol with the PMRA before starting of the study which determines the concentration of nectar and pollen in plants (plant fate study).

Canada

PART 9 **ENVIRONMENTAL TOXICOLOGY**

DACO: **9.2.4.3**
Title: **Hive study (field)**

Details: The EAD has identified a potential chronic risk to bees. In order to refine this risk, fate and toxicity data are required.

During the original review of the seed treatment use of Clothianidin (REG2004-06_revision), the EAD had identified data gaps linked with the potential of toxic exposure of non-target pollinators to residues of Clothianidin from the pollen and nectar of treated seeds. This triggered a requirement for field testing (DACO 9.2.4.3) to evaluate the possible chronic exposure to honey bee larvae and queen. The study submitted to fulfill this data requirement was deemed unacceptable.

This data is also required for the assessment of the spray application uses proposed for Clothianidin, as it is expected that such uses will also lead to the translocation of Clothianidin residues into pollen and nectar.

To date, no valid Hive studies have been submitted to the PMRA. This represents a critical data gap in the risk assessment of Clothianidin.
A new study is required to address the toxicity of Clothianidin to bees. This study must be designed to characterise the fate of Chlothianidin under field conditions, as well as chronic toxicity of Clothianidin to bees. The applicant is required to discuss the protocol with the PMRA before starting of the study.

Health Canada Santé Canada

Section 12 Notice **Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration**

Product Name: **Arena 50 WDG Insecticide**
Registration Number: **29383**
Application Number: **2008-0358**
PMRA # : **1848498**

During the conditional registration period which has been granted to **December 31, 2012**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **December 31, 2012** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a Lysimeter study conducted in coarse textured soil with a WDG formulation is required.

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Health Canada Santé Canada

Section 12 Notice **Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration**

Product Name:	**Clothianidin Insecticide**
Registration Number:	**29384**
Application Number:	**2008-0359**
PMRA # :	**1848526**

During the conditional registration period which has been granted to **December 31, 2012**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **December 31, 2012** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a Lysimeter study conducted in coarse textured soil with a WDG formulation is required.

DACO: **8.5**
Title: **Fate of Clothianidin in plants, including concentrations in nectar and pollen.**

Details: A potential risk to bees has been identified and this data is required to refine the risk assessment and determine the potential risk. The available environmental fate data for clothianidin indicates that the chemical is persistent and systemic and has the potential to accumulate in soils from year to year with repeated uses. New studies are required to generate the data necessary to characterize the potential exposure of pollinators to translocated Clothianidin in nectar and pollen resulting from spray applications. The applicant is required to discuss the protocol with the PMRA before starting of the study which determines the concentration of

Canada

nectar and pollen in plants (plant fate study).

PART 9 ENVIRONMENTAL TOXICOLOGY

DACO: 9.2.4.3
Title: Hive study (field)

Details: The EAD has identified a potential chronic risk to bees. In order to refine this risk, fate and toxicity data are required.

During the original review of the seed treatment use of Clothianidin (REG2004-06_revision), the EAD had identified data gaps linked with the potential of toxic exposure of non-target pollinators to residues of Clothianidin from the pollen and nectar of treated seeds. This triggered a requirement for field testing (DACO 9.2.4.3) to evaluate the possible chronic exposure to honey bee larvae and queen. The study submitted to fulfill this data requirement was deemed unacceptable.

This data is also required for the assessment of the spray applications uses proposed for Clothianidin, as it is expected that such uses will also lead to the translocation of Clothianidin residues into pollen and nectar.

To date, no valid Hive studies have been submitted to the PMRA. This represents a critical data gap in the risk assessment of Clothianidin.

A new study is required to address the toxicity of Clothianidin to bees. This study must be designed to characterise the fate of Chlothianidin under field conditions, as well as chronic toxicity of Clothianidin to bees. The applicant is required to discuss the protocol with the PMRA before starting of the study.

Section 12 Notice — Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration

Product Name: Clutch 50 WDG Insecticide
Registration Number: 29382
Application Number: 2012-1069
PMRA # : 2282100

During the conditional registration period which has been granted to **December 31, 2015**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **September 1, 2015** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a Lysimeter study conducted in coarse textured soil with a WDG formulation is required.

DACO: **8.5**
Title: **Fate of Clothianidin in plants, including concentrations in nectar and pollen.**

Details: A potential risk to bees has been identified and this data is required to refine the risk assessment and determine the potential risk. The available environmental fate data for clothianidin indicates that the chemical is persistent and systemic and has the potential to accumulate in soils from year to year with repeated uses. New studies are required to generate the data necessary to characterize the potential exposure of pollinators to translocated Clothianidin in nectar and pollen resulting from spray applications. The applicant is required to discuss the protocol with the PMRA before starting of the study which determines the concentration of nectar and pollen in plants (plant fate study).

PART 9 ENVIRONMENTAL TOXICOLOGY

DACO: 9.2.4.3
Title: Hive study (field)

Details: The EAD has identified a potential chronic risk to bees. In order to refine this risk, fate and toxicity data are required.

During the original review of the seed treatment use of Clothianidin (REG2004-06_revision), the EAD had identified data gaps linked with the potential of toxic exposure of non-target pollinators to residues of Clothianidin from the pollen and nectar of treated seeds. This triggered a requirement for field testing (DACO 9.2.4.3) to evaluate the possible chronic exposure to honey bee larvae and queen. The study submitted to fulfill this data requirement was deemed unacceptable.

This data is also required for the assessment of the spray applications uses proposed for Clothianidin, as it is expected that such uses will also lead to the translocation of Clothianidin residues into pollen and nectar.

To date, no valid Hive studies have been submitted to the PMRA. This represents a critical data gap in the risk assessment of Clothianidin.

A new study is required to address the toxicity of Clothianidin to bees. This study must be designed to characterise the fate of Chlothianidin under field conditions, as well as chronic toxicity of Clothianidin to bees. The applicant is required to discuss the protocol with the PMRA before starting of the study.

Health Canada Santé Canada

Section 12 Notice **Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration**

Product Name: Arena 50 WDG Insecticide
Registration Number: 29383
Application Number:2012-1068
PMRA # : 2282020

During the conditional registration period which has been granted to **December 31, 2015**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **September 1, 2015** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a Lysimeter study conducted in coarse textured soil with a WDG formulation is required.

Canada

Health Canada Santé Canada

Section 12 Notice **Additional Information Required to Fulfill the Terms and Conditions for Conditional Registration**

Product Name: ***Clothianidin Insecticide***
Registration Number: ***29384***
Application Number: ***2012-1067***
PMRA# ***2239351***

During the conditional registration period which has been granted to **December 31, 2015**, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by **September 1, 2015** and should indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.

PART 8 ENVIRONMENTAL CHEMISTRY AND FATE

DACO: **8.3.2.3**
Title: **Other Terrestrial field dissipation study**

Details: Laboratory studies indicate that Clothianidin may be classified as having a medium to high mobility in soil. However, no adequate terrestrial field dissipation studies were submitted to validate these observations. Note that the available lysimeter studies have been conducted with seed treatment formulations and, therefore, a Lysimeter study conducted in coarse textured soil with a WDG formulation is required.

DACO: **8.5**
Title: **Fate of Clothianidin in plants, including concentrations in nectar and pollen.**

Details: A potential risk to bees has been identified and this data is required to refine the risk assessment and determine the potential risk. The available environmental fate data for clothianidin indicates that the chemical is persistent and systemic and has the potential to accumulate in soils from year to year with repeated uses. New studies are required to generate the data necessary to characterize the potential exposure of pollinators to translocated Clothianidin in nectar and pollen resulting from spray applications. The applicant is required to discuss the protocol with the PMRA before starting of the study which determines the concentration of nectar and pollen in plants (plant fate study).

Canada

PART 9 ENVIRONMENTAL TOXICOLOGY

DACO: 9.2.4.3
Title: Hive study (field)

Details: The EAD has identified a potential chronic risk to bees. In order to refine this risk, fate and toxicity data are required.

During the original review of the seed treatment use of Clothianidin (REG2004-06_revision), the EAD had identified data gaps linked with the potential of toxic exposure of non-target pollinators to residues of Clothianidin from the pollen and nectar of treated seeds. This triggered a requirement for field testing (DACO 9.2.4.3) to evaluate the possible chronic exposure to honey bee larvae and queen. The study submitted to fulfill this data requirement was deemed unacceptable.

This data is also required for the assessment of the spray applications uses proposed for Clothianidin, as it is expected that such uses will also lead to the translocation of Clothianidin residues into pollen and nectar.

To date, no valid Hive studies have been submitted to the PMRA. This represents a critical data gap in the risk assessment of Clothianidin.

A new study is required to address the toxicity of Clothianidin to bees. This study must be designed to characterise the fate of Chlothianidin under field conditions, as well as chronic toxicity of Clothianidin to bees. The applicant is required to discuss the protocol with the PMRA before starting of the study.

ORDER/ADDRESS OF THE HOUSE OF COMMONS
ORDRE/ADRESSE DE LA CHAMBRE DES COMMUNES

NO.-N°	BY / DE	DATE
Q-152	Mr. Allen (Welland)	November 25, 2013 / 25 novembre 2013

RETURN BY THE LEADER OF THE GOVERNMENT IN THE HOUSE OF COMMONS
DÉPÔT DU LEADER DU GOUVERNEMENT À LA CHAMBRE DES COMMUNES

Signed by Mr. Tom Lukiwski
PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

JAN 27 2014

(TABLED FORTHWITH / DÉPOSÉ AUSSITÔT)

INQUIRY OF MINISTRY
DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./Nº DE LA QUESTION	BY / DE	DATE
Q-152	Mr. Allen (Welland)	November 25, 2013

REPLY BY THE MINISTER OF HEALTH
RÉPONSE DE LA MINISTRE DE LA SANTÉ

Signed by the Honourable Rona Ambrose

PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

With regard to the loss of honey bee colonies in Canada: (a) what are the results of the joint study led by the Canadian Food Inspection Agency (CFIA) and the Pest Management Regulatory Agency (PMRA) under Health Canada; (b) what international partners is PMRA consulting in the re-evaluation of neonicotinoid pesticides; (c) how many currently registered products contain at least one of the three neonicotinoids under re-evaluation by PMRA; (d) what is the volume of neonicotinoids used every year in Canada, expressed in litres, and on which crops are they used; (e) what plans does Agriculture and Agri-Food Canada currently have in place should there be more incidents of mass honey bee losses; (f) how many mass honey bee loss incidents have been reported in (i) 2008, (ii) 2009, (iii) 2010, (iv) 2011, (v) 2012, (vi) 2013 thus far, broken down by province; (g) when is the final joint study by CFIA and PMRA going to be completed; (h) what stakeholders were consulted for the joint study; (i) do Agriculture and Agri-Food Canada and Health Canada have an official response to the European Commission's decision to place a moratorium on neonicotinoid pesticides; and (j) what written questions have been asked in Parliament on this issue?

REPLY / RÉPONSE

ORIGINAL TEXT / TEXTE ORIGINAL [X] TRANSLATION / TRADUCTION [ ]

(a) There is currently no joint study led by the Canadian Food Inspection Agency (CFIA) and the Pest Management Regulatory Agency (PMRA).

PMRA is currently conducting a re-evaluation of the neonicotinoid insecticides, focusing on their potential impact on pollinators.

(b) The PMRA is consulting with the United States, the European Union, and Mexico. Work is being conducted through both NAFTA and OECD.

(c) As of November 26, 2013, there are 87 registered products containing one of clothianidin, imidacloprid, or thiamethoxam.

(d) The volume of the three neonicotinoids sold in Canada ranged from 150,000-200,000 L annually in years 2009-2011. Clothianidin, imidacloprid and thiamethoxam are registered for use on a wide range of Canadian crops including leafy vegetables, root vegetables, oilseed crops (e.g. canola), cole crops (e.g., broccoli, cabbage,cauliflower), tree fruit, berries and small fruit and most major field crops including cereals (e.g., wheat), corn, soybean, pulses, and other legumes.

(e) Health Canada's Pest Management Regulatory Agency is responsible for regulating the use of pesticides in Canada and as such has issued a notice of intent outlining measures to mitigate the exposures that contributed to these bee losses. Health Canada, under the authority of the *Pest Control Products Act*, would have the regulatory authority to impose additional restrictions on the use of these pesticides should it become necessary.

Agriculture and Agri-Food Canada will continue to work with Provincial Apiarists through the Canadian Association of Professional Apiculturists (CAPA) and with researchers, beekeepers, and beekeeping associations to address honey bee health issues as they arise.

(f) Information on honey bee loss incidents can be found in Health Canada's Evaluation of Canadian Bee Mortalities in 2013 Related to Neonicotinoid Pesticides - Interim Report as of September 26, 2013 (http://www.hc-sc.gc.ca/cps-spc/pubs/pest/_fact-fiche/bee_mortality-mortalite_abeille-eng.php) and in the Pesticide Product Information Database (http://pr-rp.hc-sc.gc.ca/pi-ip/index-eng.php).

(g)&(h)
There is currently no joint study led by the CFIA and the PMRA.

The PMRA will conduct a preliminary reevaluation of neonicotinoids by 2015, with a final report in 2017/18 when additional data has been generated and evaluated.

(i) Health Canada and Agriculture and Agri-Food Canada have no official response to this decision.

(j) Privy Council Office will respond.

INQUIRY OF MINISTRY
DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./Nº DE LA QUESTION	BY / DE	DATE
Q-152	M. Allen (Welland)	25 novembre 2013

REPLY BY THE MINISTER OF HEALTH
RÉPONSE DE LA MINISTRE DE LA SANTÉ

Signé par l'honorable Rona Ambrose

PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

En ce qui concerne le déclin des ruches d'abeilles domestiques au Canada : a) quels sont les résultats de l'étude conjointe dirigée par l'Agence canadienne d'inspection des aliments (ACIA) et l'Agence de réglementation de la lutte antiparasitaire (ARLA) sous l'égide de Santé Canada; b) quels partenaires internationaux l'ARLA consulte-t-elle pour la réévaluation des pesticides néonicotinoïdes; c) combien de produits actuellement homologués au Canada contiennent au moins l'un des trois néonicotinoïdes faisant l'objet d'une réévaluation par l'ARLA; d) quel est le volume, en litres, des néonicotinoïdes employés chaque année au Canada, et sur quelles cultures sont-ils utilisés; e) de quels plans dispose actuellement le ministère de l'Agriculture et de l'Agroalimentaire en cas de futurs incidents de déclin massif des abeilles domestiques; f) combien d'incidents de déclin massif des abeilles domestiques ont été signalés, par province, en (i) 2008, (ii) 2009, (iii) 2010, (iv) 2011, (v) 2012, (vi) 2013 jusqu'à présent; g) quand l'étude conjointe de l'ACIA et de l'ARLA sera-t-elle terminée; h) quels intervenants ont été consultés dans le cadre de l'étude conjointe; i) est-ce que le ministère de l'Agriculture et de l'Agroalimentaire et le ministère de la Santé ont une réponse officielle quant à la décision de la Commission européenne d'imposer un moratoire sur les pesticides néonicotinoïdes; j) quelles questions écrites ont été posées au Parlement à ce sujet?

REPLY / RÉPONSE

ORIGINAL TEXT / TEXTE ORIGINAL [ ]
TRANSLATION / RADUCTION [X]

a) En ce moment, l'Agence canadienne d'inspection des aliments (ACIA) et l'Agence de réglementation de la lutte antiparasitaire (ARLA) ne mènent aucune étude conjointe.

   L'ARLA procède actuellement à la réévaluation des insecticides de la classe des néonicotinoïdes en portant une attention particulière à leur impact potentiel sur les insectes pollinisateurs.

b) L'ARLA consulte les États-Unis, les pays de l'Union européenne et le Mexique. Le travail est réalisé tant par les pays membres de l'Accord de libre-échange nord-américain que par l'Organisation de coopération et de développement économiques.

c) En date du 26 novembre 2013, il y avait 87 produits homologués contenant soit de la clothianidine, soit de l'imidaclopride, soit du thiaméthoxame.

d) De 2009 à 2011, le volume des trois néonicotinoïdes vendus au Canada se situait entre 150 000 et 200 000 L par année. La clothianidine, l'imidaclopride et le thiaméthoxame sont homologués au Canada pour utilisation sur une grande variété de cultures, dont les légumes-feuilles, les légumes-racines, les oléagineux (par exemple, le canola), les choux (par exemple, le brocoli, le chou et le chou-fleur), les noix, les petits fruits et la plupart des grandes cultures dont les céréales (par exemple, le blé), le maïs, le soja, les légumineuses à grain et d'autres légumineuses.

e) L'Agence de réglementation de la lutte antiparasitaire de Santé Canada est responsable de réglementer l'utilisation des pesticides au Canada. Elle a donc a publié un avis d'intention décrivant les mesures à prendre pour atténuer l'exposition qui a contribué à ces pertes d'abeilles. En vertu du pouvoir conféré par la *Loi sur les produits antiparasitaires*, Santé Canada pourrait imposer des restrictions supplémentaires à l'utilisation de ces pesticides, s'il y a lieu.

Agriculture et Agroalimentaire Canada continuera de collaborer avec les apiculteurs des provinces au règlement des problèmes liés à la santé des abeilles domestiques lorsqu'ils surviennent par le biais de l'Association canadienne des apiculteurs professionnels ainsi que des chercheurs, des apiculteurs et des associations apicoles.

f) L'information concernant l'incidents de déclin des abeilles peut être trouvé dans l'Évaluation des cas de mortalité d'abeilles au Canada en 2013 attribuables aux pesticides de la catégorie des néonicotinoïdes - Rapport provisoire: 26 septembre 2013. (http://www.hc-sc.gc.ca/cps-spc/pubs/pest/_fact-fiche/bee_mortality-mortalite_abeille-fra.php) et dans la base des données Information sur les produits antiparasitaires (http://pr-rp.hc-sc.gc.ca/pi-ip/index-fra.php).

g)&h)
En ce moment, l'ACIA et l'ARLA ne mènent aucune étude conjointe.

L'ARLA réalisera une réévaluation préliminaire des néonicotinoïdes d'ici 2015. Elle présentera un rapport final en 2017-2018, lorsque des données supplémentaires auront été générées et évaluées.

i) Santé Canada et Agriculture et Agroalimentaire Canada n'ont pas de réponse officielle à cette décision.

j) Le Bureau du Conseil privé va répondre.

INQUIRY OF MINISTRY
DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./Nº DE LA QUESTION	BY / DE	DATE
Q-152	Mr. Allen (Welland)	November 25, 2013

REPLY BY THE LEADER OF THE GOVERNMENT IN THE HOUSE OF COMMONS
RÉPONSE DU LEADER DU GOUVERNEMENT À LA CHAMBRE DES COMMUNES

Honourable Peter Van Loan

PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

With regard to the loss of honey bee colonies in Canada: (*a*) what are the results of the joint study led by the Canadian Food Inspection Agency (CFIA) and the Pest Management Regulatory Agency (PMRA) under Health Canada; (*b*) what international partners is PMRA consulting in the re-evaluation of neonicotinoid pesticides; (*c*) how many currently registered products contain at least one of the three neonicotinoids under re-evaluation by PMRA; (*d*) what is the volume of neonicotinoids used every year in Canada, expressed in litres, and on which crops are they used; (*e*) what plans does Agriculture and Agri-Food Canada currently have in place should there be more incidents of mass honey bee losses; (*f*) how many mass honey bee loss incidents have been reported in (i) 2008, (ii) 2009, (iii) 2010, (iv) 2011, (v) 2012, (vi) 2013 thus far, broken down by province; (*g*) when is the final joint study by CFIA and PMRA going to be completed; (*h*) what stakeholders were consulted for the joint study; (*i*) do Agriculture and Agri-Food Canada and Health Canada have an official response to the European Commission's decision to place a moratorium on neonicotinoid pesticides; and (*j*) what written questions have been asked in Parliament on this issue?

REPLY / RÉPONSE

ORIGINAL TEXT / TEXTE ORIGINAL [X] TRANSLATION / TRADUCTION [ ]

With regard to part (j) of the question, a search of PCO records did not find any other written questions related to the loss of honey bee colonies in Canada asked in Parliament.

INQUIRY OF MINISTRY
DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./Nº DE LA QUESTION	BY / DE	DATE
Q-152	M. Allen (Welland)	Le 25 novembre 2013

REPLY BY THE LEADER OF THE GOVERNMENT IN THE HOUSE OF COMMONS
RÉPONSE DU LEADER DU GOUVERNEMENT À LA CHAMBRE DES COMMUNES

L'honorable Peter Van Loan

PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

En ce qui concerne le déclin des ruches d'abeilles domestiques au Canada : *a*) quels sont les résultats de l'étude conjointe dirigée par l'Agence canadienne d'inspection des aliments (ACIA) et l'Agence de réglementation de la lutte antiparasitaire (ARLA) sous l'égide de Santé Canada; *b*) quels partenaires internationaux l'ARLA consulte-t-elle pour la réévaluation des pesticides néonicotinoïdes; *c*) combien de produits actuellement homologués au Canada contiennent au moins l'un des trois néonicotinoïdes faisant l'objet d'une réévaluation par l'ARLA; *d*) quel est le volume, en litres, des néonicotinoïdes employés chaque année au Canada, et sur quelles cultures sont-ils utilisés; *e*) de quels plans dispose actuellement le ministère de l'Agriculture et de l'Agroalimentaire en cas de futurs incidents de déclin massif des abeilles domestiques; *f*) combien d'incidents de déclin massif des abeilles domestiques ont été signalés, par province, en (i) 2008, (ii) 2009, (iii) 2010, (iv) 2011, (v) 2012, (vi) 2013 jusqu'à présent; *g*) quand l'étude conjointe de l'ACIA et de l'ARLA sera-t-elle terminée; *h*) quels intervenants ont été consultés dans le cadre de l'étude conjointe; *i*) est-ce que le ministère de l'Agriculture et de l'Agroalimentaire et le ministère de la Santé ont une réponse officielle quant à la décision de la Commission européenne d'imposer un moratoire sur les pesticides néonicotinoïdes; *j*) quelles questions écrites ont été posées au Parlement à ce sujet?

REPLY / RÉPONSE

ORIGINAL TEXT / TEXTE ORIGINAL [ ]
TRANSLATION / TRADUCTION [X]

En ce qui concerne la partie (j) de la question, une recherche des dossiers du BCP a trouvé qu'aucune autre question n'a été posée au Parlement concernant le déclin des ruches d'abeilles domestiques au Canada.