[Date]

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

*Subject: Proposed Re-evaluation Decision PRVD2016-20, imidacloprid*

To those who regard Canadian food and economic security with importance:

We, as Canadian agricultural producers, stand together to share our concerns with the Pest Management Regulatory Agency (PMRA) proposed re-evaluation decision of imidacloprid. The proposed phase-out of the use of this insecticide is based on the perceived risk that imidacloprid may pose to aquatic invertebrates.

The Canadian agricultural industry relies on research and development, innovation and technology, and supports credible, sound science and academic peer review for regulatory decision making. Our industry is concerned that the PMRA has over-estimated potential risks to aquatic ecosystems across Canada due to limited water data monitoring, and applying climatic data from one region to model the potential risk across the varied Canadian landscape.

We, the farmers, families, researchers and supply chains that bring safe, healthy and affordable food to your table use imidacloprid, and other neonicotinoid seed treatments as part of our integrated pest management approach. As food producers, our access to varied chemistries, tools and methods to control pest outbreaks is becoming more limited.

We ask the PMRA and Health Canada to review stakeholder submissions from our national and provincial producer organizations. The Agriculture and Agri-Food Canada Roundtable of Stakeholders and the Subcommittees on Alternatives, Mitigation and Monitoring have committed to work alongside the PMRA to improve the quality of data and information on which to base this important decision. It is imperative that sound science, peer review and due process are followed as this issue impacts not only the Canadian agricultural industry, but also our national food security.

Sincerely,

[Producer’s Name]