



November 13, 2018

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9
PMRA.publications@hc-sc.gc.ca

To whom it may concern,

Re: Response to the Consultation on the Special Reviews of Clothianidin and Thiamethoxam

The Saskatchewan Association of Rural Municipalities (SARM) represents all 296 rural municipalities (RM) in Saskatchewan and has been legislatively mandated to support its members in advancing the interests of agricultural operations within their jurisdictions.

Growers ensure approved crop protection products are used in ways that are safe for human health and the environment. When changes to approved uses are being considered, the human health and environmental impacts of alternatives need to be part of that analysis.

We have concerns with the PMRA assessing non-detect (no residue) samples at 50 per cent and question why this percentage has been established in the Health Canada's Science Policy Note SPN2004-01, Estimating the Water Component of a Dietary Exposure Assessment to interpret non-detects in monitoring data sets. The PMRA noted that it, "...often lacks data to verify that reported "non-detects" were in actual areas of pesticide use and therefore has difficulty concluding that the pesticide, when used, is not in fact reaching water frequently enough to be of concern."

The modelling efforts of the EEC excluded Alberta and those datasets from Saskatchewan and Manitoba lacked information on crops grown and neonicotinoid use within the watersheds which the PMRA indicated, "...limited our ability to relate (concentration) levels observed with a particular use (and) a site-by-site comparison of precipitation levels with the 30 year historical averages was conducted and demonstrated that precipitation levels were uncharacteristically low." SARM is not comfortable with the flawed methodology and inferior data that has been used by the PMRA to propose their decisions on Clothianidin and Thiamethoxam.

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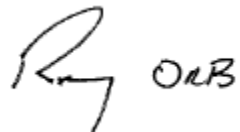
The PMRA has noted that under the *Pest Control Products Act* the registrant has the burden of persuading PMRA that the risks are acceptable during a post-market evaluation. While this is true, we believe that the PMRA must ensure that prior to making decisions on herbicide or pesticide deregistrations that the datasets they are utilizing are sound and encompassing. Additional and more thorough research of the actual impacts of the neonicotinoid use on aquatic invertebrates needs to be undertaken before the deregistrations of either Clothianidin and Thiamethoxam are considered.

Additionally, the 90-day timeframe for comments on the neonicotinoids does not allow sufficient time for stakeholder groups to generate data on alternative risk management proposals or technologies not covered in the risk mitigation options the PMRA considered in its assessments of the risks to aquatic invertebrates. For example, we understand that equipment is currently being trialed that reduces the concentration of airborne neonicotinoids upon usage.

Registered alternatives available for most of the uses of clothianidin and thiamethoxam noted by the PMRA on September 8 have not been adequately piloted to determine their efficacy in Saskatchewan. More time is needed for producers to change current practices before any herbicides or pesticides are deregistered by the PMRA.

Thank you for considering our feedback in this consultation process. Please do not hesitate to contact me directly if you have any questions regarding our requests.

Sincerely,

A handwritten signature in black ink that reads "Ray Orb". The signature is written in a cursive, slightly stylized font.

Ray Orb
President