



# Quinte Field Naturalists

*The Quinte Field Naturalists Association is affiliated with Ontario Nature, a non-profit organization sponsoring nature education, conservation and research.*

March 22, 2017

Dear Pest Management Regulatory Agency:

We at Quinte Field Naturalists commend Health Canada's Pest Management Regulatory Agency for re-evaluating the use of imidacloprid and proposing to phase-out its use over the next 3 to 5 years.

QFN sees the need, however, for the PMRA to modify its plan so that the environment can be better protected. Because of imidacloprid's high toxicity, its persistency in the environment and the risks it poses to many types of animals as well as to the integrity of soil and aquatic ecosystems, we strongly urge the government to place a full ban on this neonicotinoid pesticide and begin an immediate and rapid phase-out.

The widespread use of neonicotinoid pesticides such as imidacloprid has been linked to the decline of pollinators. This is just one example of the insidious effects of neonicotinoid pesticides on essential components of ecosystems. The effects of neonicotinoids such as imidacloprid go far beyond their harm to pollinators. The government's own assessment shows that imidacloprid poses risks to aquatic insects, soil insects and other organisms, birds and small mammals, and that its agricultural use is unsustainable.

Quinte Field Naturalists urge the government to do the right thing by banning imidacloprid and implementing its rapid phase out of agricultural use, beginning immediately. We also recommend that PMRA work to ensure that no other neonicotinoids be registered without proper assessments of environmental and health impacts.

Sincerely,

George W. Thomson, QFN President