



POSITION STATEMENT

On August 15th, 2018 the Pest Management Regulatory Agency (PMRA) released proposed decisions to phase out the outdoor use of clothianidin and thiamethoxam. These products have been used in the crop industry as a seed treatment to control pests as part of an integrated pest management program.

While the August 15th decision is not related to bees, the decision is of concern to Alberta's beekeepers:

1. The review process does not acknowledge the regional differences across the country. A study conducted in 2017 by Alberta Agriculture and Forestry: *Neonicotinoids in Surface Water from Alberta's Agricultural Areas: 2017 Report* The study concluded: "The 2017 Alberta neonic monitoring study has provided a substantial amount of data to help inform risk assessments and future decisions related to the use of neonic pesticides and mitigation of neonic contamination of Alberta's surface waters. Relative to the Health Canada chronic and acute endpoints, the data does not indicate a substantial risk to aquatic invertebrates in Alberta's surface waters."
2. In the decade since neonicotinoids seed treatments were introduced as part of a larger integrated pest management tool for the crop industry, not only did PMRA find in 2006 that neonicotinoids as a seed treatment is safe for honey bees and native bees when used as directed, the number of managed honey bee colonies has increased steadily in Alberta (318,000 colonies).
3. The current alternative to seed treatments are foliar sprays. Several research studies have shown a realistic acute toxicity of 42 commonly used foliar pesticides against adult honey bees when they are foraging as well as a high risk of foraging bees carrying these toxic chemicals back to the hive affecting the health of bee larva.
4. The priority of the Alberta Beekeepers Commission is to manage risk and exposure of commercially managed honey bees in pollination and native pollinators to harmful pesticides. Neonicotinoids when used as a seed treatment properly manage that risk.

The Alberta Beekeepers Commission will thoroughly review the August 15th, 2018 proposed decisions on Clothianidin and Thiamethoxam and will continue to actively contribute to the review process.