



Canadians push for Food Sovereignty in National Food Policy Consultation

—by Cathy Holtlander, NFU Director of Research and Policy

The federal government recently published the *What We Heard Report* — *Consultations on a Food Policy for Canada*, which summarizes public input into the Food Policy for Canada process. The National Farmers Union was involved, with representatives at the National Food Policy Summit in Ottawa, the Winnipeg regional meeting, by presenting a brief to the House of Commons Agriculture Committee and encouraging members to fill in the online survey as individuals.

In his message thanking participants for their engagement, Agriculture Minister MacAulay says “Importantly, *A Food Policy for Canada* will help move forward on our Government’s ambitious growth targets for the agricultural sector and the middle class jobs it provides, while ensuring the benefits are shared by everyone and that we respond to the areas of public trust voiced by Canadians in these consultations.”

The *What We Heard Report* shows that Canadians are pushing the envelope on food policy beyond the government’s agenda by calling for ambitious targets—not for more exports—but for a food system that brings about greater justice, community-building and ecological sustainability.

After hearing from the National Food Policy Summit, the government proposed a revised vision statement for a national food policy: *The Canadian food system provides a sustainable food supply so that all people in Canada, no matter where they live, have the ability to access a sufficient amount of safe, nutritious, and culturally-appropriate food, that in turn contributes to their health, and that of our environment and our economy.* This version was workshopped at the regional meetings where participants called for a vision statement that explicitly recognizes food sovereignty and which acknowledges all Canadian food producers, including farmers.

The draft guiding principles – that the food policy be inclusive, participatory, collaborative, results-oriented, evidence-based, integrated, systems-based, adaptable, innovative, accountable, and transparent – were supported in the consultations. Summit participants also wanted to include reconciliation as a core principle. People also called for cross-sector coordination to promote policy coherence, a holistic, systems-based approach, and putting people and communities at the heart of solutions.

The Food Policy consultation was organized around four themes: *Increasing Access to Affordable Food*; *Improving Health and Food Safety*; *Conserving our Soil, Water and Air*; and *Growing More High-Quality Food*. The themes reflect how the task was framed in the Agriculture Minister’s 2015 mandate letter, where he was asked to “Develop a food policy that promotes healthy living and safe food by putting more healthy, high-quality food, produced by Canadian ranchers and farmers, on the tables of families across the country.”

In the NFU’s written submission we noted that the first three themes are consistent with food sovereignty, but the last one is not if it is done according to the Barton Report’s recommendations for massive corporate-led growth in exports. The results of the consultation indicate that Canadians’ priorities are closer to ours than to Barton’s. The *What We Heard Report* says “Quantitative and qualitative results suggest that respondents are very concerned with protection of land, rural and remote access to food, local and organic food production, and food costs. They were less concerned with exports, trade, or the Canadian sector’s global reputation.”

In the online survey people were asked to rank the themes. The graph on page 2 shows the four themes by the percentage of respondents who ranked them as their top priority.

(continued on page 2...)

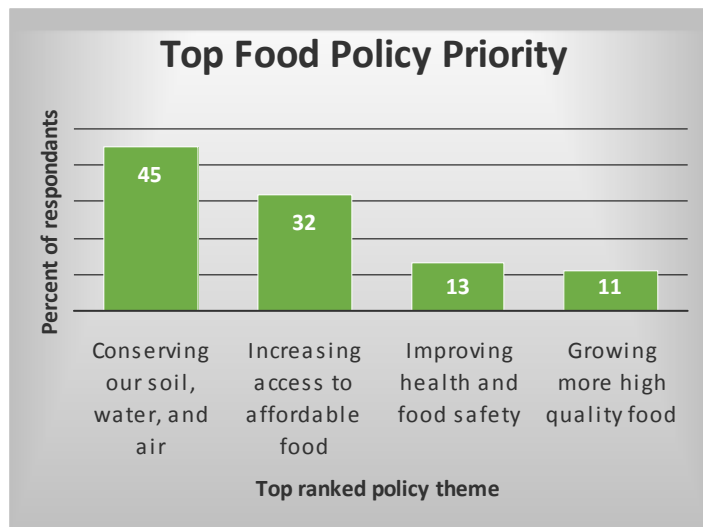
(National Food Policy Consultation, from page 1)

Here are some of the food sovereignty-related points Canadians brought forward under each theme:

Increasing Access to Affordable Food: Affordability of food has more to do with incomes than food prices, thus the proper policy target is income inequality and poverty reduction. People recognized that a focus on reducing food costs could harm farmers' incomes, and that food quality and nutrition should not be sacrificed for price.

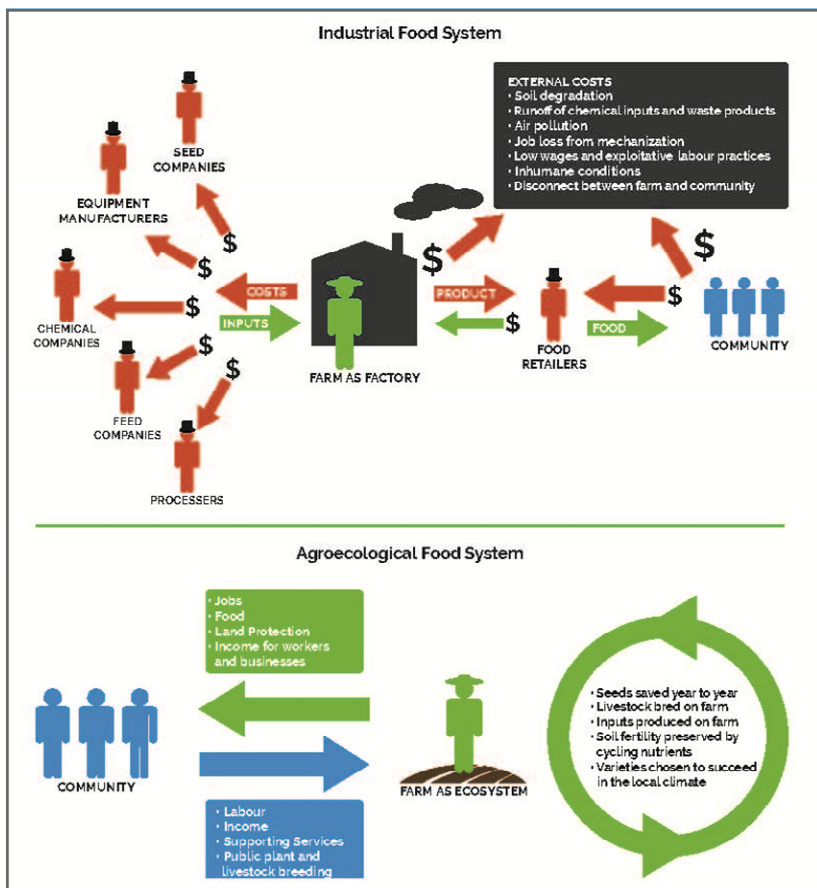
Improving Health and Food Safety: People called for meaningful labelling so consumers can better understand what their food contains and how it is produced, and also for regulatory measures to make sure imported food meets Canada's standards. Canadians support regulatory changes to promote local, small-scale, and sustainable food systems with a focus on health and access.

Conserving our Soil, Water and Air: Throughout the consultation it was clear that people want Canada to be a global leader in sustainable food system practices. Climate change action is a top concern. To create a truly sustainable domestic food system, a more holistic and ecological policy approach is needed. This will ensure long-term and intergenerational prosperity for farmers,



fishers, and ranchers. Education to support transition to a more sustainable food system is needed for both producers and consumers.

Growing More High-Quality Food: Building a stronger food system at the local and community level is needed to promote prosperity. People also call for social and institutional innovation to improve our food system, rather than technological fixes. Supporting new entrants – youth, women and Indigenous peoples – is necessary.



From the high degree of thoughtful participation in this consultation process, it is clear that Canadians care about our food system. What they have said shows that these Canadians, like the NFU, are looking for food policy that builds community, environmental health, reconciliation and justice. The government will need to be pushed towards Food Sovereignty. It is good to hear that so many of our non-farming neighbours support this direction.

To read the full *What We Heard Report – Consultations on a Food Policy for Canada* visit: <https://www.canada.ca/en/campaign/food-policy/what-we-heard.html>

This diagram contrasts the dynamics of corporate-led industrial versus agroecological food systems. Agroecology uses and creates social, cultural, economic and environmental knowledge to promote social justice, economic sustainability, healthy agricultural ecosystems and food sovereignty. The NFU promotes agroecology here in Canada and around the world with La Via Campesina.

Health Canada proposes 5-year phase out of neonicotinoids

Public input deadline November 13

—by Cathy Holtzlander, NFU Director of Research and Policy

On August 15, 2018, the Pesticide Management Regulatory Agency (PMRA) of Health Canada announced its proposed decision to phase out all outdoor agricultural and turf uses of clothianidin and all outdoor agricultural and ornamental uses of thiamethoxam over a five-year period. The PMRA previously announced it proposes to phase out all agricultural uses and a majority of other outdoor uses of imidacloprid. Final decisions on all three neonicotinoid pesticides are expected in December 2018. The public comment period on the proposed imidacloprid decision has closed. The PMRA is currently holding a public consultation on its clothianidin and thiamethoxam decisions, with the deadline for input November 13, 2018.

The August 15 announcement was based on the results of the PMRA’s *Special Reviews on Aquatic Invertebrates for Clothianidin and Thiamethoxam*. By 2017 the PMRA completed its reviews of the pollinator impacts of all three neonicotinoids and proposed banning or restricting their use on crops that bees find attractive. The *Special Reviews on Aquatic Invertebrates* are wider in scope, thus the proposed comprehensive ban on outdoor uses.

What the PMRA found

Clothianidin and thiamethoxam have similarities and differences in how they behave in the environment. Both are highly water soluble and have moderate to high mobility. They are being detected in groundwater and in the vapor given off by plants when they transpire. Clothianidin is more persistent in soil. Its “half-life” (time it takes for half of its active ingredient to be broken down) is more than a thousand days, and has been observed to have up to 80% carry-over two years after field treatment. Thiamethoxam is slightly less persistent in soils, however it transforms into clothianidin as it breaks down, making it difficult to tell which chemical is responsible for residues. In water, clothianidin’s half-life is up to 230 days in the lab and nearly 2 months outdoors. It is more persistent than thiamethoxam which has a half-life in water outdoors of 5.5 days. If the water is shallow and clear both chemicals break down quickly. Neither of them are bioaccumulative – they are not concentrated in the bodies of predators up the food chain.

Clothianidin and thiamethoxam’s toxicity to insects, along with their persistence and movement through the soil into surface water bodies where aquatic insects live means they have a significant ecological impact. Healthy aquatic insect populations are needed for healthy ecosystems – they are food for fish, amphibians, birds and mammals. Capturing nutrients, they help keep water pure; using nutrients’ embodied energy, they generate life and help make the land vibrant and beautiful.

Based on numerous industry, independent and in-house studies, the PMRA established separate thresholds for concentration of clothianidin and thiamethoxam in fresh water and in marine ecosystems which, if exceeded, kill off sensitive life-forms in these environments. Short-term acute thresholds and longer-term chronic thresholds were identified.

Owned by:	Clothianidin brands
Bayer	Titan
	Poncho
	Prosper
	Emesto Quantum
	Sepresto
Valent (a subsidiary of Sumitomo Chemical)	Nipsit
	Clutch
	Arena
Owned by:	Thiamethoxam brands
Syngenta (a subsidiary of ChemChina)	Helix
	Cruiser
	Cruiser Maxx
	Actara
	A18046A Seed Treatment
	Endigo
	Flagship
	Minecto Duo
	30901 Mainspring

(continued on page 4...)

The PRMA modelled the behaviour of clothianidin and thiamethoxam when used as a foliar spray, soil drench and seed treatment on the main commercial crops in farming areas across Canada. They did an experimental lake study, and also looked at the results of monitoring data from water bodies that are fed by cropped areas where clothianidin and thiamethoxam are applied. The results show a widespread and consistent pattern of concentration of these chemicals above the thresholds. Where monitoring data were sparse, the information collected did not indicate that risks from seed treatment are acceptable.

The PMRA looked at potential mitigation strategies to see if it would be possible to restrict, rather than ban the chemicals. They concluded these were unlikely to make enough of a difference, would be difficult to implement, and could be undone through intensification of use.

NFU calls for precaution and transition to ecological farming

The NFU has been a leader among farm organizations by calling on governments to use the precautionary approach when regulating pesticides. In 2013, NFU members passed a policy resolution calling for a five-year moratorium on the use of neonicotinoid seed treatment for field crops. We said Health Canada should require the completion of independent scientific studies on the effects of neonicotinoids on honeybees, wild pollinators, and other species (including humans) with the results made public before any moratorium is lifted. As a result of this direction, the NFU has submitted input at the provincial level in Ontario, to the Senate Agriculture and Forestry Committee and the PMRA.

The PMRA has now done or reviewed independent studies and found the environmental risks of neonicotinoids to be unacceptable. The proposed decision would phase out the chemicals over five years.

The phase-out timeline is based on *Regulatory Directive DIR2018-01, Policy on Cancellations and Amendments Following Re-evaluation and Special Review*, which states: “Where risks of concern are not considered imminent and serious, existing stocks of the products are to be phased-out following timelines ...one year of sale by registrant from the date of re-evaluation or special review decision, followed by one year of sale by retailer from the last date of sale by registrant, followed by one year of permitted use from the last date of sale by retailer.” This timeline can be speeded up when risks of concern are considered to be imminent and serious. Phase out can be delayed if no suitable alternatives to the use of the pesticide exist, so long as the human health and environmental risks, as well as value of the product, are considered to be acceptable.

Hand in hand with a precautionary approach to regulating pesticides, the NFU has promoted public funding for research into alternative methods to manage pests, improvements to data collection and monitoring so policy-makers have good evidence to support their decision-making, and education for and by farmers to adopt more ecologically friendly farming practices. Reducing the use of inputs also has the advantage of reducing the need—and cost—of buying inputs produced by agribusiness corporations. ■

Public comment

For full details on the *Special Reviews on Aquatic Invertebrates for Clothianidin and Thiamethoxam*, go to <https://bit.ly/2wZbYQZ> for thiamethoxam and <https://bit.ly/2x2MHGk> for clothianidin. If you would like a link to the recording of the PMRA webinar on this review, contact the NFU national office at nfu@nfu.ca .

If you would like to submit your own comments by November 13, 2018 , include the title of the consultation document (PSRD2018-01 – Clothianidin; PSRD2018-02 – Thiamethoxam). Send it to hc.pmra.publications-arla.sc@canada.ca or mail to:

Pest Management Regulatory Agency Publications Section
 Pest Management Regulatory Agency (PMRA)
 Health Canada
 2720 Riverside Drive
 Ottawa, ON K1A 0K9
 Address Locator: 6607D