



Canadian Association of  
**Physicians**  
for the  
**Environment**

Ontario Pollinator Health  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Food Safety and Environmental Policy Branch  
1 Stone Road West, Floor 2  
Guelph Ontario, N1G 4Y2

March 1, 2016

To Whom it May Concern:

**Re: Ontario's Draft Pollinator Health Action Plan - #EBR 012-6393**

I am writing on behalf of the Canadian Association of Physicians for the Environment (**CAPE**). CAPE is a national organization with approximately 6000 member/donors that has been existence for over 20 years. Run by a Board composed mostly of physicians, CAPE members understand the important link between human health and the physical environment.

CAPE has been outspoken about its concerns about neonicotinoid pesticides (neonics) that are applied to seeds for corn and soy crops. As the Ministry of Agriculture, Food and Rural Affairs (OMAFRA) recognizes, managed honey bees in Ontario have been in crisis since 2007 with over-wintering losses averaging around 35% over the last several years. While these losses represent a significant concern for the honey bee sector and biodiversity in Ontario, they also represent a threat to the long-term security of the food supply upon which people are dependent. When researchers at the Harvard TH Chan School of Public Health conducted a study to determine how people might be affected by the total loss of animal pollinators such as bees, they estimated that global fruit supplies would decrease by 23%, vegetables by 16%, and nuts and seeds by 22%. They predicted that these changes in food supplies could increase human deaths from chronic and nutrition-related diseases by 1.42 million people per year (1). For these reasons, CAPE is a strong supporter of the regulations that were passed by the Ontario Government in July 2015 to limit the use of neonic-treated seeds in Ontario (see op-ed and ad that were released in the fall of 2015 attached).

Today, we are responding to the Ontario's draft Pollinator Health Action Plan that was released in January 2016. CAPE welcomes this Plan which aims to protect pollinators by addressing the four main stressors: loss of habitat and nutrition; diseases, pests and genetics; pesticide exposure; and climate change and weather. We support the strategic outcomes identified in the plan; particularly those directed at supporting resilient, abundant and diverse populations of pollinators and abundant and healthy pollinator habitats.

We also support a number of the elements identified in the plan, particularly those which aim to: increase the amount of pollinator habitat on public lands; monitor the concentrations of neonic and other pesticides in the environment; and assess the effects of different land management practices on pollinators.

However, we would like to see the strategic plan improved by including:

- Specific targets, goals, timelines, budgets and assigned roles for each of the outcomes identified particularly for the goal of reducing pollinator exposure to pesticides;
- The creation of an independent advisory body to ensure that the implementation and evaluation of the Plan is based on the best available scientific evidence;
- Incentives that can be provided to farmers who employ pollinator-friendly practices; and
- A cumulative assessment of the pesticide exposures experienced by pollinators in Ontario.

We applaud OMAFRA and the Ontario Ministry of the Environment for the significant actions taken to date to protect honey bees, other insect pollinators, Ontario's ecosystem, and the long-term security of our food supply. We hope that the final Pollinator Health Action Plan will solidify the aspirational goals identified in the draft Plan.

Yours truly,

A handwritten signature in cursive script, appearing to read "Kim Perrotta".

Kim Perrotta MHSc  
Executive Director