

December 20, 2022

Paula Brand
Director SARA Policy
Canadian Wildlife Service
Environment and Climate Change Canada
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Dear Ms. Brand

Re: Consultation on the assessment of the status of the Monarch and two subspecies of the Western Bumble Bee (mckayi, occidentalis)

These are the comments of the David Suzuki Foundation and Environmental Defence on the assessments completed by the Committee on the Status of Endangered Wildlife in Canada on the status of Monarch butterfly and two subspecies of the Western Bumble Bee (mckayi, occidentalis), and the COSEWIC recommendations for their designation and protection under Canada's Species at Risk Act.

In brief, we urge the minister to act on the COSEWIC recommendations for uplisting these species without further delay, and to include clear and quantifiable objectives for pesticide reduction in the recovery strategies.

COSEWIC completed assessments of the two Western Bumble Bee subspecies in 2014, and of the Monarch butterfly in 2016. On the basis of these assessments, the scientific committee recommended that the mckayi and occidentalis subspecies be listed as special concern and threatened, respectively, and that the Monarch be up-listed to endangered. ECCC's failure to date to act on these and other COSEWIC listing recommendations undermine SARA and run contrary to Canada's commitments to halt and reverse nature loss.

As noted in the COSEWIC assessment, "The Monarch is a conservation icon and one of the most well-known and well-studied butterflies in the world."¹ Six years later, Monarch populations remain precarious. In July 2022, a subspecies of the Monarch, the Migratory Monarch, was added to the IUCN Red List as endangered.

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https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/monarch-2016.html#_assum

Listing the Monarch and *occidentalis* subspecies of the Western Bumble Bee as endangered under SARA would trigger the act's requirement for a recovery strategy. Recovery strategies for both species must recognize pesticides as a key threat and include a pathway toward pesticide reduction.

With respect to the Monarch, once it is recognized as endangered, it is illegal to harm, harass or kill the species. The COSEWIC assessment identified increased use of herbicides and subsequent decline in milkweed as a significant threat facing Monarchs throughout their North American range. Glyphosate is the most widely used herbicide and its indiscriminate use should be recognized as harassment of Monarchs, and specifically addressed in the recovery strategy. It cannot be assumed that regulation of glyphosate-based pesticides under the Pest Control Product Act provides adequate protection for the Monarch. The most recent re-evaluation of glyphosate under the PCPA, completed in 2017, did not specifically evaluate risks to Monarchs, despite acknowledging that late-season application of the herbicide on glyphosate-resistant GMO crops compromises milkweed survival.²

With respect to the Western Bumble Bee, neonicotinoid insecticides are a particular concern. In 2015, a comprehensive review of scientific literature by the independent Task Force on Systemic Pesticides found clear evidence of harm:

In bees, field-realistic concentrations adversely affect individual navigation, learning, food collection, longevity, resistance to disease and fecundity. For bumblebees, irrefutable colony-level effects have been found, with exposed colonies growing more slowly and producing significantly fewer queens. Field studies with free-flying bee colonies have proved difficult to perform, because control colonies invariably become contaminated with neonicotinoids, a clear demonstration of their pervasive presence in the environment.³

Although several jurisdictions have banned outdoor agricultural uses of neonicotinoids to protect bees, the chemicals continue to be widely used in many parts of Canada. The Pest Management Regulatory Agency completed pollinator assessments for the three main neonicotinoid pesticides in 2019, and concluded that risks to bees are acceptable.⁴ However, these assessments failed to consider the need for a more protective risk-acceptability threshold for species at risk. Moreover, the PMRA assessments of individual neonicotinoids did not consider cumulative risks to bees. Recovery planning for the Western Bumble Bee must address these gaps to protect the subspecies from pesticide threats.

Agricultural pesticide uses likely represent the most significant threat to these species but glyphosate and neonicotinoid products are also used on lawns and gardens for “cosmetic” purposes. Our organizations have recommended that the Pest Control Products Act be amended to prohibit cosmetic pesticides, except for minimum risk products, to prevent needless

² https://publications.gc.ca/collections/collection_2017/sc-hc/H113-28/H113-28-2017-1-eng.pdf

³ <http://www.tfsp.info/en/portfolio/species/>

⁴ The David Suzuki Foundation and Environmental Defence do not support this decision and call on the Pest Management Regulatory Agency to cancel registration of neonicotinoids..

threats to human health and the environment. As a first step, in conjunction with recovery planning for the Monarch and Western Bumble Bee, the federal government should immediately end the cosmetic use of pesticides like glyphosate and neonicotinoids on federal land.

The new 2030 Global Biodiversity Framework agreed to at COP15 commits Canada to reducing the overall risk from pesticides by 50 per cent. Including pesticide reduction in the Monarch and Western Bumble Bee recovery strategies will support achievement of this new target.

In parallel to the development of recovery strategies for the Monarch butterfly and Western Bumble Bee, we strongly recommend that Health Canada's Pest Management Regulatory Agency work with ECCC to develop methodologies to systematically incorporate evaluation of risks to species at risk and their habitat in pesticide risk assessments.

Sincerely,

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