



F O U N D A T I O N
S I E R R A C L U B C A N A D A
F O U N D A T I O N

The Pest Control Products Act

Remarks by
John Bennett
National Program Director
Sierra Club Canada Foundation

To the
Standing Committee on Health
February 5, 2015

Mr. Chair, Members of the Committee, I would like to thank you for this opportunity to share our experience with the Pest Control Products Act, and more specifically the Pest Management Regulatory Agency.

Sierra Club Canada Foundation is part of the oldest environmental organization in the world, dating back to 1892. In Canada, we have been working to preserve and protect the natural environment for more than 50 years.

Fundamental to good environmental policy is transparency and public involvement in making decisions that impact us all.

I have reviewed Mr. Aucoin's testimony before this committee concerning the Pest Management Regulatory Agency's commitment to public involvement. I would not say he misled the committee but the impression he gave about public insight and involvement is very different from how the PMRA actually operates.

Mr. Aucoin said, "We hold over 30 public consultations each year on all our major regulatory decisions. So for example, before we make a major regulatory decision on a new pesticide, we post for consultation the outcome of our scientific reviews and consult with the public to see if they have concerns, comments, or additions. As well the public can inspect the scientific test data and the information on which we base those decisions. Through these mechanisms, Canadians have the opportunity to voice their opinions and concerns regarding proposed regulatory decisions. The PCPA also contains mechanisms that allow any member of the public to ask for reconsideration of a major decision provided of course it's based on scientific grounds."

What he failed to mention is that the 30 consultations and the public comment period are only done after the decision has been made. We are not able to know what science has been used or not used as the basis of a regulatory decision. This is critical to provide effective comment on decisions. The PMRA does an evaluation in secret and posts it for comment. Only if you religiously check the PMRA website will you even know a new pesticide is about to be registered.

He says the public can “inspect” the scientific data. He did not say that it can only be done in person at the library, here in Ottawa. There, the public may see the scientific reports but not the Data Evaluation Records. These provide the rationales applied in the decisions made in every step of a pesticide evaluation. Only by having access to these documents can the rationale for a PMRA decision be understood and possible shortcomings in the evaluation identified.

This brings me to the review mechanism which, according to Mr. Aucoin, “allows any member of the public to ask for reconsideration of a major decision.” This is true. We can ask, but then it is up to the Minister to decide if there will be a review. Our organization, along with several others, filed such a request in September 2013, that is, 15 months ago. We heard nothing until the day after we held a press conference March 31, 2014. We received a letter stating that the request contained the necessary scientific basis and that the PMRA would respond to the request in June. In July came letter saying the response would come in the fall of 2014. During this period four or five registrations of neonicotinoid pesticides were approved by the PMRA.

Mr. Aucoin also mentioned the PMRA’s online registry. There is one, but it is barely searchable. I asked my staff to look at the registry to determine how many neonicotinoid pesticides are on the market via conditional licenses, pending the receipt of additional scientific information. For many, the PMRA was requesting more studies of the chronic toxicity to bees.

We had to download the entire database and redesign it in order it to find the information buried there.

We found 55 conditional approvals, some dating back 10 years, and no evidence in the registry that the conditions had been met so we did the reasonable thing.

In September we wrote 55 letters citing the particulars of each conditional license and asked the PMRA to provide the studies and the dates they were received. This was only to learn whether or not the conditions had ever been met. I have attached copies for the Committee

More than a month later we received a single patronizing letter basically saying: don't worry, be happy. It did not contain any dates or any suggestion that scientific papers would be made available. I attached a copy for the Committee.

Then a very curious thing happened. Last Thursday I was invited here, and Friday morning I received this email:

Mr. Bennett,

Thank you for your correspondence regarding the studies submitted in relation to section 12 notices for the conditionally registered neonicotinoid products. I would like to apologize for the delay in responding.

My office is working closely with both our legal counsel and the registrants on this request. I will provide you further information as soon as it becomes available.

Regards,
Marion Law

Why, after initially refusing give access to the data, did the PMRA suddenly have a change of heart last Friday? It appears publicity or potential publicity causes the PMRA to be more open. Although I am very happy at this turn of events it raises questions about the effectiveness of the public consultation, and the right know the rationale for approving pesticides in Canada.

Why is the PMRA consulting lawyers before releasing information on conditional licenses? Do pesticide companies have more rights than the public under the Pest Control Products Act?

I would like to end with a few words on the practice of issuing “conditional” approvals.

Ironically, the PMRA was created in large part to eliminate the practice of issuing conditional licenses for pesticides – a practice widely criticized when pesticides were managed by Agriculture.

One Earth • One Chance

The practice contravenes the Precautionary Principle. If there is any question about the impacts of a pesticide, it should not be allowed on the market. The onus should be on the manufacturer to prove a pesticide is safe before it comes on the market, not on the public to prove it's not after damage is done.

Questions were raised from the outset about the possible negative impacts on non-target insects of neonicotinoid pesticides yet they were allowed on the market.

Now, as evidence mounts, the PMRA is more concerned with public relations, defending its decisions, and protecting the industry than executing its mandate to protect public health and the environment.

By not applying the Precautionary Principle the PMRA puts itself in a compromised position.

To Conclude:

Sierra Club Canada Foundation has five recommendations for an improved Pest Control Products Act:

- The Precautionary Principle should be the basis of all approvals
- The Act should be amended to ensure that the need for a new pesticide be demonstrated as part of the approval process.
- All qualified requests for a reconsideration of a PMRA decision should result in a mandatory review, to be held within a specified period of time.
- The public should be informed at the beginning and not the end of the approval process.
- Citizen Review Committee should be established to review PMRA decisions, policies and practices and advise the minister of its findings.



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27445

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Clothianidin Technical Insecticide on December 4, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-7873 states: “During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by June 1, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted.”

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding an Acute Oral Toxicity to Leaf-Cutter Bees Study; an Acute Toxicity to Birds Study; a Long-term Hydrolysis Study; a Prospective Groundwater Monitoring Study; and a Developmental Immunotoxicity Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product’s Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27449

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Titan Insecticide on October 6, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-7235 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by June 1, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Field Crop Rotation Study; a Prospective Groundwater Monitoring Study; a Seed Leaching Study; Hive Studies and Field Studies on Environmental Toxicology.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27449

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Titan Insecticide on September 6, 2007 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2007-6051 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27453

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Poncho 600 FS Seed Treatment Insecticide on October 15, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-4171 states: "During the conditional registration period which has been granted to December 31, 2012, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28975

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Nipsit Inside 600 Insecticide on September 2, 2009 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2009-3204 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29382

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Clutch WDG Insecticide on March 6, 2012 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2012-1069 states: "During the conditional registration period which has been granted to December 31, 2015, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2015 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study; a Study on Fate of Clothianidin in Plants, including concentrations in nectar and pollen and a Hive Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29382

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Clutch WDG Insecticide on January 15, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0357 states: "During the conditional registration period which has been granted to December 31, 2012, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 31, 2012 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation study; a Study on Fate of Clothianidin in plants, including concentrations in nectar and pollen and a hive study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

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National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29383

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Arena WDG 50 Insecticide on March 6, 2012 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2012-1068 states: "During the conditional registration period which has been granted to December 31, 2015, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2015 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29383

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Arena WDG 50 Insecticide on January 15, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0358 states: "During the conditional registration period which has been granted to December 31, 2012, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 31, 2012 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29384

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Clothianidin Insecticide on March 6, 2012 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2012-1067 states: "During the conditional registration period which has been granted to December 31, 2015, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2015 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study; a Study on Fate of Clothianidin in Plants, including concentrations in nectar and pollen and a Hive Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29384

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Clothianidin Insecticide on January 15, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0359 states: "During the conditional registration period which has been granted to December 31, 2012, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 31, 2012 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study; a Study on Fate of Clothianidin in Plants, including concentrations in nectar and pollen and a Hive Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27564

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Prosper FL Flowable Insecticide and Fungicide Seed Treatment on October 17, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-4386 states: "During the conditional registration period which has been granted to December 31, 2012, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27564

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Prosper FL Flowable Insecticide and Fungicide Seed Treatment on October 2, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-7111 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by June 1, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Reducing Occupational and Bystander Exposure.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29158

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Prosper T 200 Flowable Insecticide and Fungicide Seed Treatment on November 17, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-5691 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29159

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Prosper FX Flowable Insecticide and Fungicide Seed Treatment on November 17, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-5687 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30363

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Prosper Evergol on April 6, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-1280 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Storage Stability Study and Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



Sierra Club Canada Foundation

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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30362

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Emesto Quantum on April 6, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-1278 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28159

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for GENESIS MZ POTATO SEED-PIECE TREATMENT on October 2, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-7107 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Reducing Occupational and Bystander Exposure.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28160

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for GENESIS XT POTATO SEED-PIECE TREATMENT on October 2, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-7108 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Reducing Occupational and Bystander Exposure.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27658

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for K9 ADVANTIX 10 FLEA AND TICK ADULTICIDE on July 31, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-4703 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Storage Stability Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27659

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for K9 ADVANTIX 100 FLEA AND TICK ADULTICIDE on July 31, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-4706 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Storage Stability Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27660

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for K9 ADVANTIX 55 FLEA AND TICK ADULTICIDE on July 31, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-4704 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Storage Stability Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27661

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for K9 ADVANTIX 20 FLEA AND TICK ADULTICIDE on July 31, 2006 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2006-4705 states: "During the conditional registration period which has been granted to December 31, 2007, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 1, 2007 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Storage Stability Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 24094

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for ADMIRE 240 FLOWABLE SYSTEMIC INSECTICIDE on March 16, 2007 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2007-2184 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by December 31, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Plant Metabolism Study; a Freezer Storage Stability Study; and a Residue Trials Study.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29703

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for CONFIDOR 200 SL on June 12, 2007 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2007-4338 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Environmental and Chemical Fate of Imidacloprid in Treated Trees and an Environmental Toxicology Study on Bee-Foraging Behaviour in Treated Plants and Trees.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 26665

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Thiamethoxam Technical on August 26, 2004 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2004-1936 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by March 31, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates and Non-Target Plants.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27045

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser 5FS Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5012 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27045

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser 5FS Seed Treatment on February 4, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0645 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27986

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser 350FS Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5013 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27986

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser 350FS Seed Treatment on February 4, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0646 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



Sierra Club Canada Foundation

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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28407

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Actara 240SC Insecticide on December 24, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-6327 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28407

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Actara 240SC Insecticide on January 31, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0622 states: "During the conditional registration period which has been granted to September 1, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28407

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Actara 240SC Insecticide on August 26, 2004 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2004-1937 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by March 31, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates and Non-Target Plants.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28408

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Actara 240SC Insecticide on January 31, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0620 states: "During the conditional registration period which has been granted to September 1, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28408

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Actara 240SC Insecticide on August 26, 2004 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2004-1938 states: "During the conditional registration period which has been granted to December 31, 2008, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by March 31, 2008 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding Field Studies on Non-Target Terrestrial Invertebrates and Non-Target Plants.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



Sierra Club Canada Foundation

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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29736

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Veridian 0.33G on December 18, 2007 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2007-9088 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 30, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Terrestrial Field Dissipation Study and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



Sierra Club Canada Foundation

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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29748

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Potato on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5017 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29748

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Potato on November 26, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-5789 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30723

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Flagship Insecticide on September 30, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5133 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30723

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Flagship Insecticide on June 6, 2012 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2012-2124 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30388

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for A18046A Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5011 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30388

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for A18046A Seed Treatment on September 29, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-4861 states: "During the conditional registration period which has been granted to December 31, 2014, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2014 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 26637

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Helix Liquid Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5018 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 26637

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Helix Liquid Seed Treatment on February 4, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0649 states: "During the conditional registration period which has been granted to September 1, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 26638

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Helix Xtra Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5019 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 27312

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Helix Colourless Seed Treatment on February 4, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0648 states: "During the conditional registration period which has been granted to September 1, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29127

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Cereals Commercial on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5016 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29127

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Cereals Commercial on September 3, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-4188 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29192

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Cereals Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5015 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29192

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Cereals Seed Treatment on September 3, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-4186 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28821

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Beans on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5014 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 28821

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Cruiser Maxx Beans on February 4, 2008 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2008-0647 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 29113

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for A14379B Seed Treatment on September 23, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5010 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30404

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for CONF. on October 25, 2013 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2013-5485 states: "During the conditional registration period which has been granted to December 31, 2016, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2016 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



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September 10, 2014

To: Richard Aucoin
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

Dear Mr. Aucoin:

Re: Registration No.: 30404

Sierra Club Canada Foundation (SCCF) is requesting information regarding the submission of an application for Endigo on December 2, 2010 to the Pest Management Regulatory Agency (PMRA).

After an initial review of this application, SCCF noted that the application is accompanied by a Section 12 Notice that requests additional information, in the form of required studies, to be submitted to the PMRA to fulfill the Terms and Conditions of Conditional Registration.

The Section 12 Notice belonging to application number 2010-5882 states: "During the conditional registration period which has been granted to December 31, 2013, the following information is to be generated and must be provided to the Pest Management Regulatory Agency by September 1, 2013 and must indicate the DACO numbers specified. A partial response to the outlined Terms and Conditions will not be accepted."

In order for this product to meet the Terms and Conditions of the Conditional Registration period, the PMRA requested additional information in the form of required studies regarding a Study on Fate of Thiamethoxam in Plants, including concentrations in nectar and pollen and Hive Studies.

Please provide the studies and the dates the studies were submitted as evidence that the Terms and Conditions of this product's Conditional Registration have been fulfilled.

Regards,

p.p. John Bennett
National Program Director



Health
Canada

Santé
Canada

Pest
Management
Regulatory
Agency

Agence de
réglementation
de la lutte
antiparasitaire

December 1, 2014

Ms. Mikaela Stevensen
Sierra Club Canada Foundation
1510 Nicholas Street
Ottawa, ON
K1N 7B7

Dear Ms. Stevensen:

Thank you for your letters concerning various conditional registrations.

Health Canada's pesticide registration decisions are based on rigorous evaluations of the health and environmental risks posed by a pesticide. Registrations (conditional or full) are not granted without an assessment of the product's acceptability. Health Canada considers conditionally registering a pesticide only when the outstanding requirement is to confirm the conclusions of the risk assessment.

Your letters refer to pesticide products containing the three neonicotinoid pesticides (imidacloprid, clothianidin and thiamethoxam) and, the renewal of their conditional registrations. Please note that several of the products (Registration Numbers 26665, 27658, 27659, 27660, 27661, 28159, 28160) cited in your letters have received full registration; two others (Registration Numbers 29736, 27312) were discontinued. Data or requests for renewals were all received prior to the expiry of conditional registration, as required by the *Pest Control Products Act*.

Currently, 88 pesticides are conditionally registered in Canada and pesticide products containing these three neonicotinoid pesticides account for 36 of the 88 pesticides. At the time of the original registrations of imidacloprid, thiamethoxam and clothianidin, registrants submitted complete data packages. On the basis of a thorough health and environmental risk assessment, risks were determined to be acceptable when used according to directions on the product labels. For thiamethoxam and clothianidin, some of the studies led to the need for additional data, including studies of potential longer term effects. As well, additional fate and ecotoxicity data were also requested. To comply, the registrants have repeatedly submitted additional studies in order to address the identified data gaps. Over 45 scientific documents were received for clothianidin between 2004 and 2013 and over 15 scientific documents were received for thiamethoxam between 2007 and 2013. To date, none of the submitted studies that have been reviewed, have indicated any areas of risk concern that would trigger additional regulatory action beyond a requirement to submit additional studies.

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In many cases, registrants were required to develop and submit study protocols prior to undertaking the required studies so that the PMRA could determine that the protocols addressed the outstanding issues and that the studies were scientifically robust. It should also be noted that many of the studies take several years to complete. Further, during the course of the study reviews for thiamethoxam and clothianidin, a new harmonized pollinator risk assessment framework was under development. This framework is designed to address impacts on pollinators (adult, larvae and hive health) from multiple exposure pathways. The new framework uses a tiered approach to the pollinator risk assessment, as set out in <http://www.hc-sc.gc.ca/cps-spc/pest/agri-commerce/pollinators-pollinisateurs/index-eng.php>. This approach is being implemented by both the PMRA and US EPA.

Health Canada applies a science-based approach to the regulation of pesticides. We will continue to closely monitor scientific information and other developments related to potential impacts of pest control products on pollinators, not only in Canada and the U.S., but also in Europe. Additional regulatory measures may be taken should evidence become available demonstrating reasonable grounds to believe that such action is necessary to deal with a situation that endangers the environment.

I hope that these comments have been helpful.

Sincerely,



Margherita Conti
A/Chief Registrar
PEST MANAGEMENT REGULATORY AGENCY